

WRITTEN SUBMISSION FROM HISTORIC HOUSING ASSOCIATION FOR SCOTLAND

Dear Sir

Climate Change (Scotland) Bill — Call for Views

The Historic Houses Association for Scotland (HHAS) welcomes the opportunity to respond to this important consultation. The Association represents some 250 independently owned historic castles, houses and gardens in Scotland. We conservatively estimate that approximately two thirds of Scotland's built architectural heritage is in private ownership overall. Collectively we believe we make a considerable contribution to the Scottish economy and Scottish society in general, and accordingly have considered these proposals carefully.

Having considered the Bill carefully, we believe that the clauses relating to energy efficiency are most relevant to our membership, and accordingly we have confined our detailed comment for matters covered by Questions 12 — 14 in the consultation questionnaire.

In general terms, we are supportive of the Bill's requirement for the Scottish Government to produce an action plan setting out current and proposed measures to improve the energy efficiency of buildings in Scotland, as well as measures to encourage behavioural change. We also note that the Bill confers powers on the Scottish Ministers to make regulations providing for the assessment of (a) the energy performance of non-domestic buildings; and (b) emissions of greenhouse gases produced or associated with such buildings.

In this context we would wish to make the point firmly that we believe that historic buildings justify sympathetic and, if necessary, different treatment, from more contemporary structures for the following reasons:

- There may be legal obligations which make certain energy saving measures (such as double glazing) impossible
- Certain measures may destroy the cultural and architectural value of historic buildings which enhance the well being of communities
- Historic buildings are valuable in energy terms, because their maintenance (and restoration) reduces the need for new build, which would be likely to be energy intensive (in terms of disposal of the old building, creation and transport of materials for construction, the construction process itself)
- Historic buildings can act as focuses for desirable regeneration, and that regeneration can be on as energy-efficient lines as possible.
- The materials which are used to reduce carbon emissions may damage and perhaps reduce the lifespan of an historic building.
- The materials used in historic buildings are often a key part of their authenticity.
- An holistic approach to assessment of the energy performance is essential. Embodied energy is an important consideration as is the lifecycle of building materials.

We are clear, therefore, that any such regulations must properly respect these extremely important characteristics of historic buildings and trust that you will support this view.

A further point may be relevant here. Article 4.3 of the EU Directive on the Energy Performance of Buildings (EU Directive 2002/91) provides for member states to decide not to set or apply energy efficient requirements for "buildings and monuments officially protected as part of a designated environment or because of their special architectural or historic merit, where compliance with the requirements would unacceptably alter their character or appearance". However, we understand that the UK Government is NOT going to do that, but

instead will rely on a requirement that Building Regulations are sympathetic to the needs of historic buildings.

As you will be aware, existing buildings may not fall within the coverage of modern building regulations. It is all the more important, therefore, that the Scottish Government and those who implement its regulatory system will be sympathetic to the needs of historic buildings.

Finally, we note that the Bill places a duty on the Scottish Government to take such steps as it considers appropriate to promote the use of heat from renewable sources. The Association is happy to support this initiative and would only add that many of our member properties have already espoused the cause of renewable energy for heating purposes.

We trust you will find this helpful and relevant. Should you wish a more expansive discussion of any of the issues raised above we would, of course, be delighted to oblige. We should also mention that Historic Scotland has carried out considerable research into the energy efficiency of historic buildings and anticipate their response will support and add to the points we have made here.