

The Sustainability of Traditional Buildings

This paper is available to the members of the Sustainable Traditional Buildings Alliance. It highlights some recent policy changes and consultations in areas which have an impact on the sustainability of the traditional built environment.

1) Consultation: Energy Company Obligation: ECO3, 2018 to 2022

The government is seeking views on the future design of the Energy Company Obligation (ECO) scheme. This includes:

- the scheme moving to a 100% Affordable Warmth scheme for fuel poor, low income and vulnerable households
- the energy efficiency and heating measures that can be delivered under the scheme
- the proportion of the scheme that can be delivered under Local Authority Flexible Eligibility
- how ECO can support innovation

[Bear in mind that ECO3 will be based not on a proper assessment of savings in each property but on “deemed scores”, which were introduced at the end of ECO2 in 2017. A consultation on these is expected in the summer of 2018.]

Paragraphs 106-110 address solid-walled homes. Paragraph 108 is very welcome as it recognises that a better result might be achieved through a combination of measures other than SWI - which as we know has multiple risks and is very site specific.

There is a question on whether a SWI-only minimum should be retained. We don't think that it should be retained – the drive for this comes from a wider policy on SWI at government level, springing from:

- A desire on the part of industry to get major interventions supported
- An overestimation of the benefits of SWI, based on errors in SAP and unavoidable thermal bridging
- A lack of understanding at government level of the risks of SWI

It is intended that assessment, design and installation of measures under ECO3 should be delivered in accordance with the developing PAS 2035 (see below). This would solve many of these issues as it takes a genuinely Whole House Approach to retrofit. As PAS 2035 has not yet been completed and published, it is perhaps unfair to expect the consultation on ECO3 to be aligned with its principles, but it should be.

The strong focus on innovation (to align with the Industrial Strategy) is also a potential source for concern. ECO3 is now squarely aimed at low income and vulnerable households and, as we know, new technologies and materials embraced by the mainstream without proper testing in situ do sometimes lead to unintended consequences (asbestos, Grenfell etc). There is a concern that the poor and vulnerable may be used as a testing ground for as yet unproven technologies.

The consultation closes 29/04/2018. To download and respond click [here](#).

2) New Retrofit Standard: PAS 2035

PAS 2035 "Specification for the energy retrofit of domestic buildings" continues in its development - which needs to be complete in time for the launch of ECO3 in October 2018 as all retrofits carried out under ECO3 will be required to comply with this standard. It is also hoped that it will be used in other sectors as a best practice approach.

The standard will cover the assessment and design of retrofit measures and takes into account interactions between measures, heritage, moisture risk and the avoidance of unintended consequences. The STBA welcomes this new standard and our Director serves on the Steering Group. Please contact us if you would like any particular issues raised with the Steering Group and the authors. A public consultation on PAS 2035 is expected during the summer.

3) Private Rented Sector (PRS) Regulations

The PRS regulations came into force on 1st April, to the effect that it is now illegal for landlords to enter into a new tenancy agreement for a property with an EPC rating worse than E.

While the STBA does not believe that compliance with this regulation should present any significant issues for traditional buildings, there is a much more worrying development which emerged from the "Clean Growth Strategy" of 2017. The strategy stated that "we want all fuel poor homes to be upgraded to Energy Performance Certificate (EPC) Band C by 2030."

This suggestion has been taken up enthusiastically by industry who see it as a source of profit, and by BEIS who see it as a source of carbon savings and a means of compliance with our commitments under the Climate Change Act 2008. However, the EPC assessment is deeply flawed and in any case is an estimation (only) of fuel cost, not CO₂ emissions. There is of course no appreciation of the complexity of buildings, of moisture risk, of ventilation or of heritage in an EPC assessment or report.

STBA (along with SPAB) is meeting with BEIS in April and will raise this issue. We have also drafted a scoping study on EPCs (see next item) which has been commissioned by Historic England and National Trust.

4) The wider housing stock

The same “Clean Growth Strategy” also stated that “our aspiration is for as many homes as possible to be EPC Band C by 2035 where practical, cost-effective and affordable.” It appears that in Wales and Scotland there is a desire to implement these aims even faster.

While we welcome the words “where practical, cost-effective and affordable” used in that strategy wherever the aspiration is mentioned, in reality these caveats are often misunderstood or ignored. This has already happened - the aspiration is repeated in the CCC’s [Independent Assessment of the UK's Clean Growth Strategy](#) (January 2018), which repeats the 2035 commitment without these words (p9, P15 etc). QED.

In any of this there is of course very little understanding of risks and of the embodied energy and wider environmental impact of retrofit work. Where the savings are minor, retrofit work may even lead to a net increase in carbon emissions. There is also a complete failure to grasp the opportunity of retrofit to deliver community regeneration, providing local jobs, and reinvigorating craft skills essential to the proper repair and maintenance of our traditional building stock.

A Whole House approach should be used instead - the EPC is clearly the wrong tool to drive or measure the success of retrofit and the current narrow focus approach will lead to unintended consequences.

STBA has written a scoping study on EPCs and how they could be better aligned with a Whole House Approach; this should be available to our members by the end of April. STBA is joining National Trust, CLA, IHBC and SPAB to meet with the energy Minister Claire Perry in May, where we will raise this issue; we will also seek clarity on the “exemption” for listed buildings and those in conservation areas.

For more policy background, see the STBA Policy Mapping: Edition 2 (August 2017) available to [download here](#).