



SUSTAINABLE TRADITIONAL  
BUILDINGS ALLIANCE

Address 5 Baldwin Terrace, London N1 7RU  
Telephone 020 7704 3501 • Email info@stbauk.org

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## **STBA's Response to the "Each Home Counts" Review**

The STBA's response is divided into four sections:

- A) Points which the STBA welcomes
- B) Requests for clarification
- C) Recommendations for the Implementation Phase
- D) Testing and piloting of the Conclusions & Recommendations

### **A) Points which the STBA welcomes**

The STBA welcomes the "Each Home Counts" Review and in particular:

- The recognition that education and training and capacity building is needed at all levels within the industry
- The requirement to carry out a bespoke and thorough assessment of **each** property
- Acceptance of the need to take a whole-building approach to retrofit
- The proposed information hub (STBA had previously proposed this)
- The understanding of the need to carry out robust monitoring of retrofitted buildings
- The commitment to make monitoring data more widely available

### **B) Requests for clarification**

The STBA has already submitted two requests for clarification on workstreams via email as suggested by the Newsletter of 13<sup>th</sup> January without response so they are repeated here:

1. Traditional buildings constitute 35% of the domestic stock, and an even higher percentage of those that require retrofit. It is well understood that traditional buildings need very particular care. As there is no mention of traditional buildings in the Review, we believe that it is essential to have a workstream on traditional buildings in addition to those that have been specified. Is there any reason why an additional workstream could not be set up at this stage?
2. The STBA has cutting-edge expertise in five of the proposed workstreams (Advice & Guidance, Insulation/fabric, Holistic Consideration, Quality & Standards, Skills & Training), so we would like to propose appropriate members from our Supporting Organisations. What is the process for selecting the workstream committees?

### **C) Recommendations for the Implementation Phase**

We appreciate that the Review was limited by its original scope but it is clearly viewed by industry as having the potential to provide a blueprint for retrofit in the UK so the following points become relevant in the implementation phase in order to prevent unintended consequences and to maximise the benefits of retrofit:

1. There is considerable evidence now of failures in retrofit, including the health risks

clearly flagged up in UCL's 100 Unintended Consequences report. Evidence gathered by BRE does not appear to have been published, nor has the failure at Preston been publicly acknowledged. **Failure must be properly and openly investigated and feedback loops established so that lessons can be learned for the future.**

2. In order to quantify the potential benefits of retrofit, it is necessary to carry out effective auditing of a sufficient number of installations (given variations in condition, services, location and occupation) so that costs and benefits (including but not limited to carbon savings) are known before consideration of any widespread roll-out of retrofit measures. **It is essential to base important decisions about the housing stock on empirical data, not on modelled data.**
3. It is absolutely necessary to establish through Building Regulations the principle that no-one should be empowered or permitted to make substantial changes to thermal and moisture performance of traditional buildings without a thorough understanding of how these buildings currently perform, according to **BS7913, or an equivalent and freely accessible standard.** [This will require changes to Part L1B of the Building Regulations, including Table A1 which currently recommends the use of a vapour control layer where this is inappropriate.]
4. Industry representatives inevitably have a tendency to favour substantial interventions where profit can be generated. However, it is clear that for many buildings and for older buildings in particular that they perform best thermally when correctly maintained, but maintenance is not mentioned in the Review, other than the maintenance of retrofit measures themselves. **The importance of basic maintenance should be highlighted as a first step prior to or instead of expensive retrofit measures.**
5. In many cases repair is required prior to retrofit. Retrofit without repair is partly responsible for the widespread failures in cavity wall insulation. Aside from 13.2, repair is not mentioned in the Review, so we suggest that **repair should become a central component of the Holistic Property Consideration workstream.**
6. The materials used for retrofit, and the process by which retrofit is carried out, have a much higher environmental impact in the short or even medium term than the savings which may result. There must be proper consideration of the environmental impacts of materials, **not just embodied energy/carbon but also pollution caused in manufacture, depletion of scarce resources, and recyclability of all materials.**
7. Retrofit offers an opportunity to achieve a wide range of social, economic and environmental goals – the triple bottom line. This is nowhere reflected in the Review, due to its limited scope. Retrofit can be used as a method of moving the long term unemployed back to work and helping deprived communities take pride again in their environment (Arbed is a good example). **The best way of reducing fuel poverty is to reduce poverty – this is an opportunity not to be missed, but unlikely to be embraced in an industry-led process.**
8. It is of course understood that retrofit requires a long-term view far beyond a single Parliament, so this should be acknowledged in all workstreams.

#### **D) Testing and piloting of the Conclusions & Recommendations**

It is a normal part of any major experiment in industry or science to test a new approach at a small scale with a pilot scheme. For a pilot scheme to be successful it must meet the following criteria:

- It should be properly funded and supported.
- There must be full monitoring, feedback and analysis.
- Difficult or unpalatable conclusions must be accepted and necessary changes integrated into the wider programme of retrofit – i.e. the pilot is not about verification but about testing and, if need be, can lead to the proposed policy being discarded or radically changed.
- Where the pilot scheme reveals the need for further piloting, this should be accepted and funded.

The “Each Home Counts” review framework is similar in some ways to the STBA scheme currently being trialled by Bristol City Council (BCC). The challenges of piloting a Whole House approach, with a Joined up process of training, kitemarking, Quality Assurance and feedback are considerable, particularly as the current funding mechanisms and standards are not aligned. Furthermore there are liabilities and risks involved.

It is suggested that a joined up process involving BEIS, BCC and STBA is established, so that the above criteria can be met. STBA would be engaged to:

1. Assist BCC more fully with implementing their guidance, by enhanced support in training, QA processes and if need be, further development of tools and guidance.
2. Undertake the monitoring, feedback and assessment of the project, looking at not only the technical performance but the full whole house impacts (i.e. on health, heritage, community, energy in their fullest sense) as well as on local skills, consumer confidence and council ambitions.
3. Assist with re-integration of this feedback with the Review implementation framework process.
4. Integrate the feedback into the systems modelling which should be run in parallel and used to test this pilot

The above proposal is a simple, relatively low-cost process for testing the aims, means and outcomes of the Review. It would not only benefit this particular policy, but could have much wider benefits in policy development, as well as helping to deliver real, measurable long term benefits to our housing, society and environment.

Nigel Griffiths  
Director, STBA