

Climate Change Mitigation Supplementary Briefing

July 2014

The Heritage Alliance

About the Heritage Alliance

The Heritage Alliance is a non-government organisation and the voice of the independent heritage movement.

The Heritage Alliance is the largest coalition of heritage interests in England. Together its members own, manage, and care for the vast majority of England's historic environment. The Heritage Alliance represents over 90 Members – major national and regional non-Government organisations, which are in turn supported by over 6.3 million members, volunteers, Trustees and staff. Together its members own, manage, and care for the vast majority of England's historic environment.

Research shows that looking after heritage can contribute significantly to the challenge of climate change resulting from excessive carbon emissions. The Heritage Alliance believes that national policy needs to recognise the substantial carbon benefits of retaining and adapting older buildings.

The Heritage Alliance Manifesto 2014/15

What is the Heritage Alliance asking for?

The Heritage Alliance calls on all political parties:

- To promote the contribution that the historic environment can make to a low carbon future, shifting the policy and fiscal framework towards the beneficial re-use and recycling of older buildings.
- To improve Standard Assessment Procedure [SAP] (etc) measurement methodologies which are used to measure buildings and give them Energy Performance Certificate (EPC) ratings, so that these in future will correctly reflect the characteristics of real buildings, especially buildings of traditional construction.
- To ensure that the physical measures recommended in EPCs, and in the lists of Green Deal and subsidised measures (i) do include measures which are effective, cost-effective, and sympathetic in traditional buildings, and (ii) do not include measures which will be ineffective and/or cause physical damage. Research, guidance, and training are also required. This will require some policy and financial support from Government because the market is unlikely to deliver research, training, or safe and cost-effective physical measures quickly enough.
- To amend policy, and the measurement methodologies, so that they are based on all carbon impacts, including the often-high carbon impacts of the new materials used in new buildings or inserted into existing buildings.
- To implement fiscal incentives to encourage better maintenance of historic buildings.

Why are we asking for these changes?

These recommendations are rapidly becoming urgent as provisions on energy performance come into effect. In the past, managers of existing buildings have been largely free to ignore physical measures which were ineffective or damaging. Now, as Building Regulations are tightened, as landlords will be compelled under the Energy Act 2011 to make changes to let buildings from 2016-18, and as Government considers mass programmes of solid

wall insulation, it is becoming vital that the sums, and the physical measures, are right. Otherwise there is a real danger that these policies will not gain credibility and will not work, or conversely of an epidemic of buildings with major damp and health problems and a mis-selling scandal with serious financial consequences.

The Heritage Alliance supports the mitigation of climate change, and is aware of international and [national greenhouse gas reduction targets](#). Existing buildings form a high proportion of the buildings which will exist in 2050, and a substantial proportion of these are the older buildings of traditional construction (essentially pre-1919 buildings) with which the Heritage Alliance is primarily concerned.

Policies to encourage climate change mitigation should be evidence-based, effective, and non-damaging. Traditional buildings are constructed in a variety of methods and materials, and their conservation, repair and maintenance often requires an approach fundamentally different to that appropriate for modern buildings. Research (see 'Useful resources' below) suggests that the current SAP (etc) measurement methodologies underestimate the energy efficiency of old buildings. It also suggests that a one-size-fits-all approach designed for modern buildings is unlikely to deliver the benefits claimed, is unlikely to be cost-effective, and in many cases will lead to real physical problems, especially damp, which greatly reduces energy efficiency, is often difficult and expensive to cure, and can lead to health problems for occupiers.

Government has recognised the importance of existing and historic buildings in combating climate change. Sustainable development is at the core of the National Planning Policy Framework (NPPF, 2012) and Guidance (2014), which also repeatedly stress the need for the recycling of existing buildings to reduce the need to build on greenfield sites, and the need for "local planning authorities [to] ensure any advice to developers is co-ordinated to ensure consistency between energy, design and heritage matters".

The Alliance shares this belief that the re-use and recycling of older buildings helps to minimise carbon impacts. This avoids loss of embodied energy, prevents landfill associated with demolition, and avoids the very high upfront carbon impacts of replacement development.

The repair, maintenance and improvement of traditional buildings is a core part of climate change mitigation policy.

The Heritage Alliance has been a member of the Department for Energy and Climate Change's Older Properties Working Group, which examined ways in which the Green Deal could be best applied to older properties. It works with the Sustainable Traditional Buildings Alliance, while it also supports research which several of its members are undertaking on the sustainability and energy efficiency of older buildings in order to provide a more accurate basis for policy-making.

Useful resources and websites

- Responsible Retrofit of Traditional Buildings, Sustainable Traditional Buildings Alliance, 2012. See <http://www.retrofitbuildings.com/images/pdfs/stba%20responsible%20retrofit.pdf>
- Responsible Retrofit Knowledge Centre. See <http://responsible-retrofit.org/>
- 'Energy Efficiency and Historic Buildings: Application of Part L of the Building Regulations to historic and traditionally constructed buildings, English Heritage, 2012. See <http://www.english-heritage.org.uk/publications/energy-efficiency-historic-buildings-ptl/eehb-partl.pdf>
- SPAB Briefing: Energy Efficiency in old buildings. See http://www.spab.org.uk/downloads/SPAB%20Briefing_Energy%20efficiency.pdf
- Historic Scotland [Technical Papers](#)

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