

Written evidence submitted by The Heritage Alliance to the Business, Energy and Industrial Strategy Committee inquiry on energy efficiency

The
Heritage
Alliance

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1. The Heritage Alliance is delighted to submit written evidence to the Business, Energy and Industrial Strategy Committee inquiry on energy efficiency.
2. The Heritage Alliance is England's biggest coalition of heritage interests, bringing together nearly 130 mainly national organisations supported by over 7 million members, friends, volunteers, trustees and staff. From historic buildings and museums to canals, historic vehicles and steam railways, the Heritage Alliance's diverse membership owns, manages and cares for the vast majority of England's historic environment and forms a key part of the cultural sector.
3. **Existing housing stock – solid wall insulation**
4. The Heritage Alliance strongly objects to the Government's requirement set out in [its response](#) to treat 17,000 solid walled homes per year. Nearly all solid wall homes are likely to be heritage assets – most listed buildings will be of solid wall construction and in these cases installation of SWI will need listed building consent. The application of external solid wall insulation will be further constrained where properties are in conservation areas or the installation of external SWI will affect the setting of a listed buildings. Even outside of these restrictions, SWI will harm the significance of non designated heritage assets.
5. Internal SWI insulation can mean the loss of historic features such as ornate plasterwork or woodwork - harming heritage assets. There is also [concern](#) that solid wall insulation may, in some cases, cause damp. A target is likely to lead to installation where the factors that may lead to damp are not properly considered.
6. Solid wall Insulation should not be installed externally on one house in a semi- detached pair or one house in a terrace as this will significantly undermine their architectural unity diminishing their heritage value.
7. While solid wall Insulation may be appropriate in some cases, it's suitability must be judged on a case by case basis. A minimum target will drive inappropriate installations. However, we welcome the Government's introduction of flexibility so that these homes can be treated using solid wall insulation (SWI), or, if equivalent savings can be achieved in that property, using a combination of other insulation and renewable heating technologies. This does not go far enough to address our concerns.

8. For the majority of solid wall properties, a combination of other measures such as improved insulation, draft proofing, secondary glazing and improving the energy efficacy of boilers rather than SWI could be more appropriate and cost-effective to install whilst achieving the same level of bill savings. If all such measures have already been taken a discount could be given to those in fuel poverty. This would mean that the amenity of heritage assets which benefit the whole community would not be harmed.

9. **Existing housing stock – Energy Performance Certificates (EPCs)**

10. THA members in the Heritage Sector have long been concerned about the calculated performances of traditional buildings, which has meant that they are regarded as poorly performing and in need of drastic measure to improve their performance. This has the double whammy effect of harming their 'special architectural or historic interest' and often having unintended consequences which harm the long term health of the building and its occupants.

11. EPCs need improving and their scope clarifying. The performance of building components can exceed that predicted by the software on which EPCs are based - as the Society for the Protection of Ancient Buildings' (SPAB's) research into the U-values of solid walls has clearly demonstrated as can be shown in their [research findings](#).

12. EPCs should provide greater accuracy than at present and further research is required. Renaming should also be considered to make it clear that they are not a measure of energy performance but an estimation of energy costs.

13. EPCs are not - despite their name - a substitute for an energy audit and should be part of a wider sustainability assessment that considers moisture risk, ventilation and heritage significance (NPPF term) in addition to just a building's energy performance. We need to deliver a sustainable built environment - not only a low carbon one.

14. Additional training is needed for the EPC assessors. Highly damaging recommendations are often made in EPCs that fail to appreciate the fundamental differences in construction and performance between 'traditional' and 'modern' buildings (pre- and post-c1919 buildings respectively). This is jeopardising the health of occupants as well as the fabric of old buildings.

15. The confusion regarding EPCs and listed buildings should be resolved. The Private Rented Sector (PRS) Guidance 2017 states that an EPC is not required where the landlord (or seller, if relevant) can demonstrate that compliance with minimum energy efficiency requirements would unacceptably alter a listed building's character or appearance. The problem is, though, that this cannot be ascertained by an owner unless they know what the recommended improvement measures are, i.e. unless an EPC is commissioned.

16. The Sustainable Traditional Buildings Alliance (STBA) has recently produced a very good [scoping study on EPCs](#) and they also offer [advice on retrofitting traditional buildings](#).
17. **Existing housing stock – Waste management strategy**
18. The Government has published its resources and waste strategy for England published which sets out how it intends to preserve material resources by minimising waste, promoting resource efficiency and moving towards a circular economy in England.
19. At 1.3.2 this states that the Government will develop plans to increase resource efficiency and minimise waste in the construction sector, working with the Green Construction Board. It notes that the construction, excavation and demolition sector is estimated to have produced around 120 million tonnes in 2014 in the UK.
20. However, it is striking that the plan makes no link to the perverse 0% VAT incentive which incentivises the demolition of old buildings rather than their repair and reuse which is charged at a 20% rate. Measures to encourage the reuse rather than demolition should be embedded in the planning system if the Government seriously wants to tackle this source of waste. There is currently no mechanism to capture the waste of embodied energy when existing buildings are demolished and replaced. This must be addressed to ensure a better understanding of energy efficiency.
21. The Alliance would be happy to discuss these issues in more depth.