

The Rt Hon Greg Clark MP  
Secretary of State for Business, Energy and Industrial Strategy  
1 Victoria Street  
London  
SW1H 0ET

cc; The RT Hon Karen Bradley MP  
Secretary of State for Digital, Culture, Media and Sport

The RT Hon Sajid Javid MP  
Secretary of State for Communities and Local Government

30<sup>th</sup> October 2017

Dear Secretary of State,

**Energy efficiency and traditional buildings**

We are a group of leading heritage organisations who play a part in looking after the nation's older building stock. We believe that conservation of energy and conservation of buildings go hand in hand. However, we also share a common concern: that current energy conservation policy and practice are flawed in their application to traditional buildings, causing damage and creating risks from the perspectives of both heritage and human health; and we would like the opportunity to discuss this with you.

Buildings of traditional construction make up to 35% of the dwelling stock. Lack of understanding that these buildings need a different approach due to their construction has already led to a waste of money and carbon on inappropriate interventions, and their subsequent rectification. Not only do they fail to deliver the predicted savings, in some cases they make energy efficiency worse. These issues will be greatly compounded if the current approach goes unchanged. In our view, remedying this situation should be an early energy policy priority for Government.

As conservation organisations, we share the Government's concern about the risks of climate change, and we welcome the Clean Growth Strategy and agree with the need for practical policies to tackle it. Energy efficiency is a cornerstone in this, as well as dealing with fuel poverty. However, current policy to address energy efficiency in the nation's building stock is overly simplistic, having been designed from the perspective of modern construction and materials, paying insufficient attention to fundamental building physics, such as how traditional materials and structures 'breathe', resulting in inappropriate and damaging measures.

While we share the Government's concern about the serious health risks to humans resulting from dampness and poor ventilation in domestic properties, current interventions, when applied to an older property, can compound ill-effects. This is



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because Government measures have overlooked the need to put buildings into good repair before applying retrofit measures, coupled with a lack of understanding of the context for retrofit works. These problems have been exacerbated by an underlying and longstanding skills shortage for traditional building repairs, compounded by the lack of people with an understanding of energy efficiency in traditional buildings. Hence there is little opportunity for meaningful correction at assessment and implementation stage.

The resulting combination of insufficient understanding, failure to repair before retrofit, inappropriate specification, and poor execution, allied with inadequate safeguards, has seriously compromised successive governments' efforts to mitigate climate change through retrofit. Urgent change is needed to put retrofit efforts on better track.

An additional concern of our organisations - some of which represent landlords of older properties - is the lack of clarity about a Listed Building exemption in the Private Rented Sector (PRS) Regulations which come into full force in less than six months' time. This has made it very difficult for landlords to understand their responsibilities or to have a clear approach to upgrading properties; and the timescales are now unfair and potentially impractical.

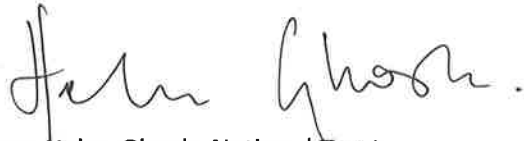
Since all main parties share a commitment to the Climate Change Act and the Paris Accord, we hope that it will be possible to take a long term approach and look well beyond the new Parliament to enable all concerned to explore and trial optimum solutions, whilst building skills and capacity.

Well maintained, older buildings can be the very essence of sustainability, due to their embodied energy, the durability of materials and their tolerance of sympathetic alterations. Getting maintenance and retrofit right should, therefore, be a priority to a Government facing the twin pressures of housing stock shortfall and climate change. We welcome the recognition that successive Governments have given to the historic environment: the acknowledgement of the contribution older buildings make to the character of our towns, villages, streets and rural landscapes, and the place they play in our nation's cultural identity. Supported by the right policy, older properties could both maintain their cultural significance and make a vital contribution to any sustainable building strategy and energy conservation.

**Successful retrofit can only be achieved using a 'whole house' approach which integrates fabric measures, services and people's behaviour; and current policy and practice do not deliver this.** We urge the Government to engage with the signatories on the issues defined and to address our concerns (kindly see the enclosed policy requests for more information). We can offer supportive experience and knowledge to find solutions.

We would appreciate a meeting with the Ministers at an early opportunity to discuss how regulatory improvements in this sensitive area can be progressed so that the nation's older buildings are safeguarded for future generations to use and enjoy, and can play their part in tackling climate change concerns in a substantive and appropriate way.

Yours sincerely,



Dame Helen Ghosh, National Trust



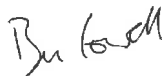
Becky Clark, Director, Cathedral & Church Buildings, Church of England



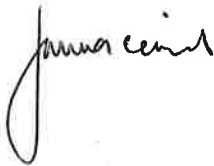
Nigel Griffiths, Director, STBA (Sustainable Traditional Buildings Alliance)



Matthew Slocombe, Director, SPAB (Society for Protection of Ancient Buildings)



Ben Cowell, Director General, Historic Houses Association



James Caird, Chair, IHBC (Institute of historic Building Conservation)



Ross Murray, CLA President, CLA (Country Land and Business Association)



Matthew Slocombe, Secretary, Joint Committee of the National Amenity Societies

## **POLICY REQUESTS – Energy efficient retrofit**

**The signatories argue for a whole house approach which integrates fabric measures, services and people's behaviour.**

Specifically, we recommend that the Government:

1. **Reviews the Energy Performance Certificate (EPC) Register** to ensure that recommendations for traditional properties do not damage fabric or irresponsibly affect building character.
2. **Provides, as a matter of urgency,** clarification on whether listed buildings and properties in conservation areas are required to have an EPC and will therefore be expected to comply with the PRS energy efficiency regulations.
3. **Commissions research focusing on the energy efficiency of different wall types used in traditionally built properties to improve the accuracy of the Standard Assessment Procedure (SAP) methodology.** The forthcoming change to SAP (i.e. correcting the default U-value of solid walls to be closer to measured values) is welcomed, but strategically, this correction shows how urgent a wholesale review of SAP is, in order to avoid penalising unfairly not just listed buildings but our entire traditional housing stock.
4. **Funds more research** to better understand traditional buildings and the way they work. This is essential to inform decisions about appropriate interventions to sustain our older building stock.
5. **Ensures appropriate safeguards** for traditional buildings in any new energy efficiency schemes through a **joined-up approach** building on existing regulations<sup>1</sup>.

**To further all the above, supports a Task and Finish Group** (in place of the Older Properties Working group, convened by DECC but subsequently discontinued), **with clear deliverables, to include disseminating and promoting the SQA qualifications for Older and Traditional Buildings<sup>2</sup> developed under its auspices.**

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<sup>1</sup> Many of the current problems could have been avoided had ECO and PAS 2030 (neither of which mentions traditional environment) been cross-referenced to the Special Consideration for breathable buildings in Part L of the Building Regulations, which has been in place since 2002.

<sup>2</sup> <http://www.sqa.org.uk/sqa/68730.html>