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26 April 2019

Dear Sir
Energy Company Obligation: ECO3

The Institute of Historic Building Conservation is the professional body of the United Kingdom representing conservation specialists and historic environment practitioners in the public and private sectors. The Institute exists to establish the highest standards of conservation practice, to support the effective protection and enhancement of the historic environment, and to promote heritage-led regeneration and access to the historic environment for all.

We are very pleased to have the chance to comment on the consultation document. The Institute's comments are as follows:

Q1-Q15 - no comment

Q16

This is not consistent with the Clean Growth Strategy (as claimed) as this has targets framed in terms of EPC scores. EPC headline scores are based on cost not on carbon emissions, so oil heating scores better on EPCs than biomass, which is lower carbon.

Q17-Q18 - no comment

Q19

Para 98 suggests that this will deliver a "more complete package". It is not safe to install insulation without ensuring that there is adequate ventilation, and without carrying out an assessment of moisture risks.

Instead, a “whole-house” approach is essential, as recommended by Each Home Counts, mandated through PAS 2035 which will govern ECO3 installations, and as advocated by the STBA.

Q20

The STBA agrees with this approach. We are aware of work by the National Trust on its own rented stock which shows that it can be more cost-effective to use other approaches than SWI. This is not just a question of technologies, it depends on behaviours.

Q21 The approach outlined in Q20 is much better, and allows scope for risks associated with SWI to be avoided.

Q22 The minimum is set at the right level.

Q23 The 66% figure seems appropriate

Q24-Q25 - no comment

Q26 We agree with this proposal as long as the approach recommended in the current draft of PAS 2035 is adopted.

Q27 Agree

Q28

It is not possible to agree with this without knowing how the deemed scores have been calculated, and how they have been empirically tested. Furthermore, the concept of “uplifting” scores would seem to be an attempt to manipulate the market - if the analysis of savings available through particular measures does not confirm what the government has decided for other reasons is desirable. This is not an honest and empirical approach and should be abandoned.

Q29-Q30 - no comment

Q31

We do not believe that innovation and experimentation should be carried out using the poorest people in society - as this is what the ECO3 scheme is now squarely aimed at. Innovation is not the solution - we have all the solutions we need. What is most needed is not innovation, but greater understanding. There is a particularly urgent need for greater understanding of moisture in traditional buildings (up to 35% of the stock), and of the risks of unintended consequences, as highlighted in BRE’s Solid Wall research for DECC. The outcomes of this research need to be published in full to inform ECO 3. The real innovation required is to learn how to apply known solutions in a balanced way which takes into account the context of the property, the condition, the occupants and their interaction with the building

fabric and energy systems. This is a question of survey, understanding, methodology, whole house design, and high quality installation backed by training and certification.

Q32 - see answer to Q31 The most urgent need is not for innovation, but to change existing practices to ensure appropriate retrofit of traditional solid wall buildings.

Q33

The one "measure" which is consistently absent from these policy documents is maintenance. Older buildings in particular are much more energy efficient if they are able to function as they were originally designed. A dry wall is more effective as a thermal insulant than a wet wall. Begin by ensuring that there are no leaks at roof level or around window reveals, that masonry is fully pointed, that ground levels are correct and these low-cost measures will deliver substantial savings.

Q34-Q36 - no comment

Q37

While quality of installation is important, far more important is the quality of the survey and the selection and design of retrofit measures, as part of a whole building approach. The Quality Mark in its draft form ensures neither a whole building approach, nor that individual measures are appropriate to buildings of traditional solid wall construction. Awareness of the special consideration for such buildings under Part L1B of the Building Regulations is a vital starting point.

Q38 - no comment

Q39 Yes

Q40 Yes

Q41-42 - no comment

Yours sincerely

A handwritten signature in black ink, appearing to be 'FN', written in a cursive style.

Fiona Newton
Operations Director