



· INSTITUTE · OF · HISTORIC ·
BUILDING · CONSERVATION

Making Heritage Work

All-Party Parliamentary Green Deal
Group
35 Endell Street
London
WC2 9BA

James Caird
Consultant Consultations Co-ordinator
IHBC Business Office
Jubilee House
High Street
Tisbury
Wiltshire
SP3 6HA

18 November 2013

Tel (01584) 876141
Web site www.ihbc.org.uk
E-mail consultations@ihbc.org.uk

Dear Sirs

**APPGDG – CURRENT GREEN DEAL INVESTIGATION AND SURVEY CLOSING
18 NOVEMBER 2103**

The Institute of Historic Building Conservation (IHBC) 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 writing to contribute evidence to the current Inquiry on the Green Deal. We have seen the SurveyMonkey survey but, as this seems to be aimed mainly at individual contributions, we thought it would be better to submit our corporate views by letter. To aid clarity, we have structured this letter in line with the SurveyMonkey questions to which the paragraph numbers refer.

1. Misguided approach to treatment of traditionally constructed buildings – likely unforeseen consequences of long-term building failures and costs with inadequate provisions for liability.
2. The IHBC strongly supports the objectives of the Green Deal to reduce fuel use and carbon emissions. We think that the nation's stock of traditionally constructed buildings (solid wall and breathable construction – about 25% of the stock) can contribute much to the targets but only if treated appropriately. We think the Green Deal as currently formulated does not cater adequately with inherent differences between traditional and modern construction and is likely to prove more costly in the long-term (in both money and carbon emissions) for traditional buildings which are given the Green Deal treatment.

We think a radical rethink is needed for traditionally constructed buildings which takes into account Guidance from the Sustainable Traditional Building Alliance (STBA), English Heritage (EH) and the Society for the Protection of Ancient Buildings (SPAB). The Green Deal should make it very clear that traditionally

constructed buildings should be treated differently to more modern ones and set such projects on a completely different implementation strategy which is guided by people with appropriate qualifications and experience.

In particular we draw your attention to these points:

- The unforeseen consequences of inappropriate measures being applied to solid wall buildings (over 25% of the building stock), trapping moisture, with the consequent promotion of mould and rot. These give rise to adverse health implications for occupants and wall deterioration in what was built as breathable construction acting as a thermal store.
- The cost (financial and carbon) of remedial works required to rectify building failures, which are inevitable if inappropriate works are carried out.
- The inappropriateness and unrealistic basis of current systems (SAP and RdSAP) for measuring energy loads and demand in existing buildings, leading to claimed savings which are unachievable. These have been shown to be misrepresentative of traditional buildings by EH/SPAB research.
- The lack of provision in the Green Deal for securing necessary and appropriate repairs prior to installing the measures. Green Deal installations over defective fabric is likely to fail.
- The failure of the Green Deal to consider buildings, and carbon costs of proposed measures, on a whole life cycle basis thus not taking into account (for example) the carbon emissions arising from the manufacturing and installation of Green Deal treatments some of which have very high carbon loads in their manufacture.
- An enormous and long-standing shortage of specifiers and installers who understand traditional buildings. Although efforts are being made through AssetSkills to remedy this, these are on nothing like the scale, and with nothing like the urgency needed. There is no sign yet of the new National Occupational Standards for Older Traditional and Vulnerable buildings (following the Asset Skills consultation on the draft earlier in 2013), or the qualifications based upon them which are an essential prerequisite for developing suitably skilled assessors and installers.

IHBC is particularly concerned that such measures continue to be installed in spite of strong research evidence (including past and current DECC-commissioned research) which questions standards and conventions on which the Green Deal, ECO, and the forthcoming Private Rented Sector scheme are based.

The recent All-Party Built Environment Group report "Re-Energising the Green Agenda" highlighted the need to speed up the whole Green Deal process. What it did not consider is the fundamental issue that works are going ahead on traditional solid wall buildings, with Government encouragement, but without taking account of good existing research evidence (including DECC-funded work by the STBA) or key current research (the DECC-funded Solid Wall research by BRE Wales) needed to show whether the works are appropriate.

There are consequently very real risks of failures on a massive scale, with equally massive potential liabilities (on whom these will fall has yet to be clarified), and certain massive waste of carbon, which will negate the aims of the whole scheme.

As we stated in opening, the IHBC is supportive of the need to reduce fuel usage and carbon emissions across all building types. The Green Deal does not seem to us to be the appropriate response to this need, certainly as far as traditionally

constructed buildings are concerned. We would like to be involved in devising an appropriate scheme, but the Green Deal "machine" is being very slow to take up these issues.

3. Professional Body representing historic environment practitioners.
4. Other – our members are seldom involved in the Green Deal as such but are already widely engaged in dealing with building problems resulting from inappropriate insulation treatments of traditionally constructed buildings.
5. We wish to be considered a critical friend, but remain unconvinced that an adequate Green Deal approach to traditionally constructed buildings can be achieved without a major overhaul of the system.
6. Some of our members report having had Green Deal assessments in which the advice was inadequate, measures proposed inappropriate, and key works needed not eligible.
7. Safeguards in Green Deal Provider Code of Practice may have avoided inappropriate works to traditional buildings, but there are no such safeguards for ECO.
8. There needs to be much more and considerably better training on traditional construction for Green Deal assessors and installers)
9. Publicity not working well at all
Measures not working well at all
Participation not working well at all
Applications not working well at all
Financing not working well at all
10. Publicity not working well at all
Major retailers not working well at all
Suppliers not working well at all
Local Councils not really working well
11. Press ads yes definitely
Stories yes definitely
TV / Radio yes definitely
Local events yes definitely
12. Mostly negative.
13. Changed and much less positive.
14. Insulation 1
Energy bills 5
Industry 5
Competition 5
Switching 5
Energy mix 5
15. Green Deal and ECO 1
Carrying on 2
Additional incentives 1 (assuming the scheme is amended as we suggest)

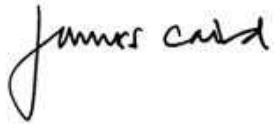
ECO to general tax 5
ECO preserved 5

16. All types not well

17. Solid Wall buildings, Private Rented Sector

We hope these comments are helpful.

Yours faithfully

A handwritten signature in black ink that reads "James Caird". The signature is written in a cursive style with a large, looping initial 'J'.

James Caird
Consultant Consultations Co-ordinator