

## Response ID ANON-VA3B-YF55-N

Submitted to **Call for evidence on the reform of the Green Deal Framework**

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### Why we are seeking evidence

#### Your details

##### Name

###### Name:

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##### Email address

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##### What is your organisation?

###### Organisation:

Historic England

##### Are you happy to be contacted if we have any questions about your response?

Yes

#### Green Deal Participants

##### 1 What roles do you see in the future for the above Participants? Can any or all of these roles be fulfilled without the need for formal Green Deal status?

###### Please answer here:

The use of the formal Green Deal status when dealing with older buildings of traditional construction does not at present provide any specialist advice or protection for the customer when seeking a green deal. There are no additional benefits offered by the Green Deal - the customer could seek their own loan and source specialist advice from an experienced practitioner and contractor. In addition the Green Deal uses an EPC for the assessment which RdSAP is not the best tool for assessing solid walls at present.

None of the certification bodies, advisors or assessors require to be specially trained or accredited to work on older buildings and there is no way at present for the customer to check on the register who has that specialist knowledge or experience.

In the future it could be that the Green Deal Certification Body could be a means of ensuring that, from the assessor through to the installer those involved have the necessary specialist skills and experience that are required when working and advising on buildings and on the register this is made obvious. With help from heritage bodies a standard for what they level would be and what training and experience is required.

##### 2 What interactions and relationships need there be between different Green Deal Participants?

###### Answer here please:

Green Deal Certification Body needs to have involvement between all the participants to ensure they have the correct training and level of competency to work on older buildings with a greater auditing of work carried out by specialists.

#### Green Deal Assessment

##### 3 Is it necessary for all types of assessment to be carried out by professionals (i.e. authorised Green Deal Advisors, or a future equivalent)? Would some form of self-assessment (e.g. by consumers) be possible and sufficient? If so, what might need to be in place to enable this?

###### Please answer here:

Yes professionals should always be consulted.

Consumers will not have the necessary skills to make those decisions and could make damaging and costly mistakes.

##### 4 In their current form, are GDARs necessary, or helpful to Providers and consumers? What outputs might lenders need in any future scenarios?

**Please answer here:**

For the Consumers; the GDAR's are based on information from the EPC which uses RdSAP, for buildings of solid wall construction at present this is not an accurate assessment. If the EPC has not been completed correctly in terms of the age and construction type, then recommendations will be inappropriate for instance recommending solid wall insulation. The costing information at this stage is also not helpful as it is generic and can be misleading in the savings that could be achieved.

For the Provider; the GDAR's are based on information from an EPC which as explained above for solid wall is not accurate. Recommendations are automatically generated, which may not be appropriate for the home in terms of the heritage significance and moisture issues when thinking about solid wall insulation. In addition the condition of the house would not have been established and repairs maybe required before this work could be carried out.

**5 What value do In-Use Factors have? Do they achieve the aim of increasing consumer confidence and protection for consumers? Do they help provide lenders with confidence?**

**Please answer here:**

Unfortunately for solid wall houses, even the in-situ savings are not useful as it will not take into account for instance, the repairs that maybe required before solid wall insulation can be carried out.

Therefor when savings are shown they are misleading to the customer. So in this instance the saving shown on an EPC will greatly decrease rather than increase which is the aim of 'In-Use Factors' to lower the amount the customer borrows.

**Green Deal Measures**

**6 How might the process for incorporating new measures be made more efficient, and help enable the deployment of innovations and new technologies?**

**Please answer here:**

As part of the Green Deal Framework the Government could set up a testing center where new technologies could be monitored in field trials so the savings are based on real data.

They could also support specialists to undertake field trials to test the technologies rather than relying on manufactures data, which can be inaccurate. This may also improve consumer confidence if the trials are undertaken by recognized bodies.

**7 Is it better to have a list of qualifying energy efficiency improvements in secondary legislation or should the legislation just set out high-level principles (with the Standard Assessment Procedure – SAP - helping to determine whether an improvement falls within the principles)?**

**Please answer here:**

Generally no, as measures impact on other aspects of a building and should be looked at as a whole and not in isolation. If you are changing a boiler over it is a good opportunity to look at a lower carbon heat source and the heating controls - not just like for like replacement or you are missing opportunities. If you carry out fabric improvements you may need to look at the heating controls and make adjustments.

The only item that could be allowed would be low energy lighting - such as LED as this would not have an impact on any other aspect of the building.

**8 Are there alternative ways to determine what measures could be installed and funded using the PAYS mechanism, which would help enable the deployment of innovations and new technologies?**

**Please answer here:**

No comment.

**Green Deal measures - continued**

**9 What do you see as the merits of including the above measures in the Green Deal? Do you have any comments on whether they meet the criteria for measures?**

**Please answer here:**

Do not see merit in including battery storage. For green deal you need to payback through your electricity meter which means you have a connection to grid electricity so can fed back additional electricity and be paid for. The economic case needs to be clear for taking a larger loan with interest to pay for a larger PV system generating additional electricity to be stored in a battery to be used later versus a smaller loan for a PV system where there may not be additional electricity, but if there is it is fed back to the grid and the bill payer is credited for that. Could see the merit if you live in a rural area with an unreliable power supply - but that may be fairly rare.

Connections to existing heat networks should be encouraged where they exist over the use of new gas boiler - can generate 30% savings on gas-supplied heat networks than using individual gas boilers.

If the boiler is condemned then it must be replaced, not sure if there should be a public subsidy for this. For those on low incomes are there not other mechanisms in place to help with this?

## **Consumer confidence, protection and redress**

**10 Could the system which provides consumer confidence, protection and redress be managed differently? For instance, do other existing general consumer protections, such as those available to consumers under the broader consumer credit regime, provide alternatives? Can you foresee developments resulting from the implementation of the Each Home Counts recommendations as offering scope for change?**

**Please answer here:**

No comment.

**11 Does the disclosure of a Green Deal Plan to prospective homeowners or tenants have to be by means of providing an Energy Performance Certificate? What alternatives exist?**

**Please answer here:**

No comment.

**12 Where consumers wish to make a number of improvements but not all meet the Golden Rule, are there any ways of better facilitating this?**

**Please answer here:**

What is the point of having a rule. Unless collectively they meet the golden rule.

**13 Do you have any other comments on these elements of the Framework? Are there any ways in which they could be re-organised and improved, without any detriment to the consumer?**

**Please answer here:**

No comment.

**14 Are there changes that could be made to the Framework to make it more accessible or attractive to landlords and tenants in both the private rented and social housing sectors?**

**Please answer here:**

No comment.

## **Authorisation and certification of parties**

**15 Do you see a need for specific Green Deal authorisation and accreditation? What role might parties involved in this play in the future?**

**Please answer here:**

No comment.

## **Other elements of the Framework**

**16 We would welcome comments on any of the above elements of the Framework, and whether there is any case for a change in arrangements and the feasibility of making any such changes.**

**Please answer here:**

No comment.

**17 The Government signalled its intention in 2012 to review the administration fee within three years of the Framework becoming operational. Although later than originally intended – primarily because of the low level of take-up of the Green Deal – the administration fee will be reviewed as part of this call for evidence and subsequent consultation. We would welcome any views on the administration fee, including on the amount, and whether this is the most appropriate way of compensating suppliers for the costs of collecting the Green Deal charge.**

**Please answer here:**

No comment.

## **Any other issues**

**18 Are there factors that we have not identified that you believe will, or should, influence the future of the Framework? How might they influence it?**

**Please answer here:**

No comment.

**19 Are there any other opportunities to improve the Framework, not covered by the above?**

**Please answer here:**

No comment.

**20 Are there any aspects of the Framework you wish to comment on specifically in relation to non-domestic usage of the Green Deal, not covered above?**

**Please answer here:**

For non-domestic buildings as with domestic any improvements that are made need to ensure that they maintain the well being of the occupants. Well intentioned measures to improve air infiltration and thermal performance can create unhealthy places to work and live in and it is essential when these measures are carried out there is a period of monitoring.