

The Rt Hon Grant Shapps MP
Minister for Housing and Local Government
5/G9 Eland House
Bressenden Place
LONDON, SW1E 5DU

16 October 2010

Dear Minister,

At the end of August I sent a letter and statement to you, Andrew Stunnell, Bob Neill and Baroness Hanham on behalf of a group of leading building experts informally called the St Pancras Group. We received a reply to this letter from Georgina Fuller, Assistant Policy Officer at CLG on the 28th of September, thanking us for our letter and statement and saying that the points we raised would be considered and would help to decide priorities for improving Building Regulations.

In particular she wrote

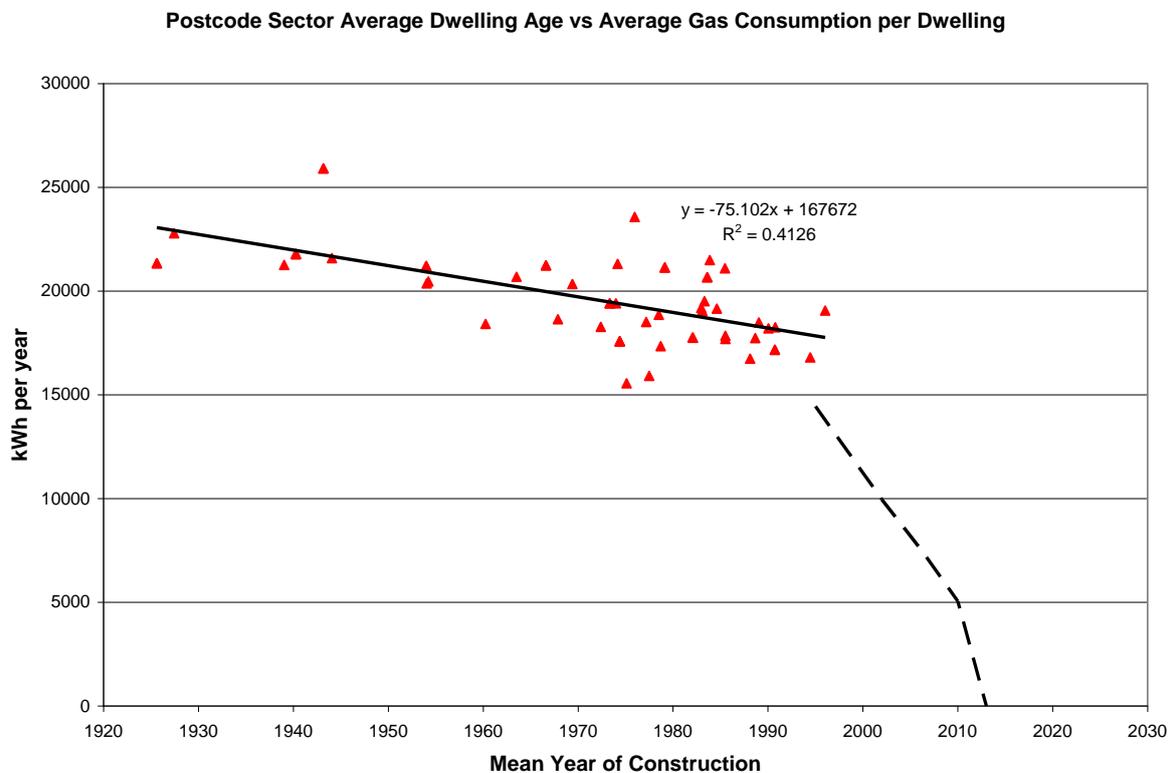
“As you know, Ministers are committed to delivering more energy efficiency in buildings and have specifically asked for ideas about how we can ensure that we are really delivering these savings.”

It is in this area of real delivery of energy savings that we feel our knowledge and experience is unrivalled in the Industry and amongst academics and other experts, and it is for this reason that we are requesting a meeting with yourself and your advisors to make clear our proposal and to offer assistance in helping to formulate any consultation about future building regulations and other sustainable buildings legislation.

I myself sit on the Code for Sustainable Homes Advisory Group and was formerly in the Technical Advisory Group (which I chaired at several meetings). Several of our group are leading members of the Building Regulations Advisory Committee (BRAC) and David Strong is the chair of the Energy Efficiency Partnership for Homes. Chris Herring is the Chair of the AECB and also of the Passivhaus Trust (and in fact several of us are leading Passivhaus figures). Since writing the letter we also now have the full support of Paul Everall CEO of LABC on behalf of himself and of LABC itself. We also have much informal support from leading figures in the House Building and the Environmental sector.

The fact is that in spite of many years of energy efficiency legislation, energy use in homes has gone up by 24.4% over the past 40 years (it has gone up by more in non-domestic buildings) and the proportion of energy used in heating homes is almost the same as it was in 1971. (Please see the figures at the end of this letter taken from Government data). This

is partly a function of an increase in total dwellings of 38% (while the population has only increased by 9% in this period), and of a huge increase in appliances and unregulated energy use. However the basic fact is that energy use in heating each building has hardly decreased at all. Please see the chart below, based on real data from Milton Keynes.



Annual gas consumption versus age of dwellings in Milton Keynes (courtesy of Alex Summerfield, Bartlett School of Graduate Studies). Raw data from the DTI on-line database of energy use by postcode sector. Each point represents between several hundred and 2000 dwellings. Milton Keynes was chosen for this study because of its homogeneity compared with other UK conurbations plus the access to mains gas for all dwellings. The dashed line indicates the expected trajectory of performance based on implementation of the 2002 and 2006 revisions of Part L and the proposals in *Building a Greener Future* (DCLG 2007).

The “expected trajectory” has not happened and cannot happen if we continue on the current policy strategy.

The work done by the Good Homes Alliance and Leeds Metropolitan University on examining the fabric performance of new homes recently found that in conventional housing the heat loss was about 100% more in reality on completion of the buildings than it was designed to be (although in the case of the specialist environmental house builders who are part of the GHA the deviance was only 20% maximum). We believe that that figure will get much worse in these buildings over time (as building systems break down) and also in regard to new buildings (as we aim for higher standards of building performance). There is a fundamental problem with the skills and the supply chain in the UK in regard to low energy buildings, both domestic and non-domestic. This is clearly evidenced in the work of experts

such as Leeds Metropolitan University (for example the work on Stamford Brook) and the Usable Buildings Trust.

Furthermore there are considerable risks to building low energy buildings on a mass scale without proper understanding, skills and supply chains. These are risks particularly to the health of occupants, the durability of the buildings and the efficacy of new “low carbon” technologies. There is of course also a massive financial risk to house builders, contractors, designers, insurance companies, and home and building owners. For this reason the Zero Carbon Hub and the Good Homes Alliance have separately set up research groups on Health and Indoor Air Quality and House Insurance companies are refusing to insure new technologies. There is already considerable concern about airtight buildings which are not built or designed correctly (as reported to the GHA by the Homes and Communities Agency). Much research into asthma (by institutions such as UCL and Strathclyde University) confirms a very high risk of increased illness in badly built airtight dwellings. Asthma is just one of many possible risk areas.

The St Pancras Group Statement was not only about Building Regulations, but called for a complete re-think of all Sustainable Building Legislation in order to address these issues. Our basic position, which is proven by our research and our practical experience, is that complex and overambitious legislation and targets do not deliver good buildings or reduction of environmental impact. In fact they do the opposite. They confuse, disempower and lead to a tick box approach with no interest in real delivery. For this reason we are strongly advising that sustainable building legislation is radically simplified with a clear focus on the building envelope and a fully integrated process of monitoring and learning. This is the only way in our opinion that we will avoid the continuing failure to deliver significant energy savings and also avoid hugely increasing health, fabric and financial risks. It is the only way that we can build a long term sustainable industry and building culture.

We are therefore requesting a meeting with yourself and your advisors to explain our position and to help if at all possible in re-drawing the sustainable buildings legislation to the benefit of the economy, society and the environment. What we are suggesting will also save on Government costs, while putting responsibility and learning back into the hands of businesses, communities and individuals.

I am sending this letter through Zac Goldsmith MP who has kindly offered to bring it to your attention.

Yours sincerely

Neil May
On behalf of the St Pancras Group

Tables of energy use in UK Buildings. Basic data is from the Department of Energy and Climate Change (2009) as analysed in Vale, Brenda and Vale, Robert (2010) 'Domestic energy use, lifestyles and POE: past lessons for current problems', Building Research & Information, 38: 5, 578 — 588. According to a separate analysis of these figures, the past 20 years have seen an increase in energy use in domestic building stock of around 19% while population has increased by only 4%. So the situation is not improving, but rather getting worse overall.

	1971	2007	% change	% of total (1971 -2007)
Space heating	870.9 PJ	1042 PJ	+19.8	58% - 56%
Hot water	410.3 PJ	473.1 PJ	+15.3	28% - 26%
Lights and appliances	117.2 PJ	284.7 PJ	+142.9	8% - 15%
Cooking	92.1 PJ	54.4 PJ	-40.9	6% - 3%
Total	1490.5 PJ	1854.7PJ	+24.4	

	1971	2007	% change
Population	55million	61million	+9%
Dwellings	19.25 million	26.65 million	+38%
Overall domestic energy consumption	1490.5 PJ	1854.7PJ	+24.4%
Av consumption per dwelling	77.4GJ	69.6GJ	-10.1%
Av size of dwelling	85m2	76m2	-10.6%