

Outstanding action from Energy and Sustainability Consultant and Chair, BSI Retrofit Standards Task Group

Request for information:

During the course of the meeting you agreed to provide examples of Housing Associations who want to improve homes but are discouraged by the regulator.

Response

You have asked me two questions - about the regulation of housing organisations' borrowing for retrofit, and about MVHR.

On the regulation issue, my point was that the Regulator of Social Housing, in succession to the Homes and Communities Agency, reportedly discourages social housing organisations from borrowing to fund retrofit of their housing stocks, whilst encouraging them to borrow for new-build developments (explicitly because building new homes is a Government priority). I would go further than this, and suggest that the Regulator also encourages social housing organisations to manage their stocks in an inappropriate 'commercial' manner, for example by valuing their housing assets and disposing of homes with low value. A consequence of this is that homes with low net present value (NPV) tend either to be redeveloped (which is fine) or to be disposed of to other organisations (e.g. private landlords) who are less able to invest in them or to address fuel poverty issues. The NPV assessment rarely takes into account occupants' costs (e.g. fuel), which are external to the calculation. I have no documentary evidence that the Regulator promotes these approaches, but several housing association clients have told me about them; I recall one asset manager suggesting that borrowing to improve existing homes is "frowned upon" by regulators "so we don't do it". It is also abundantly clear when working with social housing associations that they are 'development rich and asset management poor'.

We did try using MVHR in Thamesmead, unsuccessfully, in the run-up to the Condensation, Damp and Mould programme. There were several problems, which I think are generic to the use of MVHR in domestic retrofit. First, too many ducts - the ductwork is intrusive, takes up space, and is difficult to route discreetly within the insulated building envelope. In Thamesmead, the reinforced concrete cladding panels and internal partitions containing asbestos could not be penetrated for ductwork and made routing the ducts almost impossible, so we chose demand-controlled MEV (which is equally efficient but has half as many ducts). Second, maintenance - Peabody did not have the resources to visit homes every six months to change the MVHR filters, and occupants could not be relied upon to do it themselves. Third, effectiveness - the MVHR installations we tried did not solve the CDM problem, and at least one was switched off by the occupants, who considered it too noisy. These are all common problems with MVHR in retrofit, because MVHR is a new-build technology that does not fit easily into existing homes, and especially not into small ones. I think there is also a problem that amongst consultants some Passive House / EnerPHit 'zealots' tend to simply believe in MVHR as a component of the standard, rather than thinking about what type of ventilation is appropriate to a project. We are trying to address this in the Retrofit Coordinator training programme, which includes an entire module on ventilation.

I hope this answers your questions.