

Response ID ANON-EXAA-W9B6-7

Submitted to **Consultation on the Energy Efficiency Standard for Social Housing post-2020 (EESH2)**

Submitted on **2018-07-24 11:32:50**

2032 Milestone

1 What are your views on the proposed target to maximise the proportion of social housing meeting EPC Band B by 2032?

Question 1: What are your views on the proposed target to maximise the proportion of social housing meeting EPC Band B by 2032?:

BEFS would reiterate HES' statement that: This is fine as an aspiration, but a lot of work is required on possible medium to long-term consequences. In paragraph 24, for example, the list of possible negative impacts needs to also include mould and condensation and the consequences of this as well as saturation of building fabric as a result of poor detailing of insulation, neither of which are mentioned. This should also be included in the Proposed Trajectory diagram on p.6, in 2018 information on mould growth, condensation and building defects which have occurred following retrofit should be gathered as well as information regarding air quality. There is also in paragraph 24 no mention of poor standards of retrofit / lack of skilled workforce as a driver for poor air quality.

BEFS would add that there are many buildings currently assessed as not able to achieve a band B. These homes should not be condemned to obsolescence and future potential demolition. A building may be able to achieve an EPC band D and have 200 years of use left, not to speak of the embodied energy its many years of service may already have demonstrated. To potentially demolish this stock due to EPC rating/rating potential and replace it with buildings with a far shorter design life (of 30/40 years) is a strategy flawed from both a financial and carbon perspective. Whilst social housing tenants deserve the highest of standards, potentially removing properties from the available stock due to standards which currently may not accurately reflect the building's performance does not benefit individuals or wider society.

2 What are your views on the proposal for a lower target of EPC Band C for detached houses and houses reliant on specific fuel types (e.g. oil, LPG and solid fuel)?

Question 2: What are your views on the proposal for a lower target of EPC Band C for detached houses and houses reliant on specific fuel types (e.g. oil, LPG and solid fuel)?:

Whilst BEFS broadly supports the comments from HES below, it is also considered that this question only stands to highlight the failings with the current EPC assessment process. It would be better to have an assessment and band rating which was able to take into account the necessary variations in building type and location, particularly differences inherent to traditional construction methods.

BEFS also supports the view from HES -To have a lower target simply for detached houses is simplistic. It would be better to base the lower target on building types and locations where it is not desirable, or feasible, on technical grounds/ geographic location to make the standardised alterations - for example solid walls, timber frame buildings, areas with no access to mains gas etc

2025 Review and additional factors in the 2032 Milestone

3 What are your views on the proposed content of the review:

(a) to assess progress towards meeting the new standard?:

BEFS supports, "The new 2032 milestone indicates a shift in the framing of the standard to a milestone which maximises attainment rather than 100% compliance. This will require a new approach which recognises that for certain landlords less than full attainment for all stock of the new milestone will not be failure, provided all reasonable efforts have been undertaken to improve the energy efficiency of their stock."

This change in thinking may allow for additional data to be gathered about non-traditional and traditionally built housing stock which can then inform and enhance the understanding of the EPC rating assessment system.

(b) to consider the 2032 milestone in the context of technological developments?:

BEFS would reiterate that technological developments are a positive and necessary step – but emphasis also needs to be placed on human behaviour, including tenant education.

As well as 'new' technology, traditional building methods and forms of energy efficiency also need to be taken into account when considering appropriate methods to enhance/upgrade/improve the EPC ratings for traditionally built properties.

(c) to consider any additional requirements of the 2032 milestone regarding air quality and environmental impact?:

BEFS supports the HES response that - Including a review based on air quality is vital to the long-term success of the standard. However, this must be widened to include not just air quality but condensation, mould growth and damage to building fabric. In order to make such a review robust detailed inspections of a range of building types which have been retrofitted to meet EESH2 will need to be carried out. There is a question here also as to why the principle of "no detriment to air quality" will only apply from 2025, this should already apply to retrofit and should also include mould growth and damage to building fabric.

4 In terms of the timing of the review, what are your views on:

(a) the proposal to review the new standard in 2025?:

Whilst it may be frustrating to those currently implementing measures to improve the standards of their buildings, as technology improves and changes it is only fitting to review and reassess standards where applicable. BEFS would hope that a greater understanding of how the EPC ratings could/should be applied to traditionally built buildings would also be reviewed over this period.

(b) the proposal to review the standard earlier if UKG has made announcements on hydrogen and the re-provisioning of the gas network?:

BEFS agrees with the view from HES - This is sensible

5 Do you have any other comments on the further requirements proposed for the EESSH 2032 target?

Question 5: Do you have any other comments on the further requirements proposed for the EESSH 2032 target?:

BEFS reiterates that changes to EPC would be useful in accurately assessing ALL buildings. And supports the statement from HES that:

Regarding targets, mould growth, human health, condensation and building fabric deterioration should be central to the review process and should be regarded as more important than EPC bands achieved, not an adjunct to this.

Minimum Standard

6 What are your views on the proposed minimum standard that no social housing should have an energy efficiency rating of less than EPC Band D?

Question 6: What are your views on the proposed minimum standard that no social housing should have an energy efficiency rating of less than EPC Band D?:

There is a question about what happens to social housing that cannot be brought up to the standard. This could have the unintended consequence of reducing the amount of social housing available in certain areas, for example rural areas with a large proportion of off-gas detached buildings, or areas where building type (as currently assessed) may make it difficult to achieve a band D. This stock should not be condemned to obsolescence and future potential demolition. A building may be able to achieve an EPC band D and have 200 years of use left, not to speak of the embodied energy its many years of service may already have demonstrated. To potentially remove this stock from social housing use due to EPC rating/rating potential) is a strategy flawed from both a financial and carbon perspective.

There is also a question about what happens to sitting tenants if their social housing cannot be brought up to a band D.

7 It is proposed that this minimum standard of EPC Band D applies to social housing from April 2025, in line with the standard for the private rented sector. What are your views on this timescale for social housing?

Question 7: It is proposed that this minimum standard of EPC Band D applies to social housing from April 2025, in line with the standard for the private rented sector. What are your views on this timescale for social housing?:

As above

Exemptions

8 What are your views on the proposal that landlords would need to provide a short narrative explanation of their performance in their annual returns to the SHR?

Question 8: What are your views on the proposal that landlords would need to provide a short narrative explanation of their performance in their annual returns to the SHR?:

No comment

9 What are your views on the proposal that limited exemptions should apply to the 2025 minimum standard for new lets?

Question 9: What are your views on the proposal that limited exemptions should apply to the 2025 minimum standard for new lets:

BEFS supports HES' view that: Technical exemptions must remain in EESSH2. To remove this safeguard will result in a feeling that measures should be undertaken regardless of their suitability to building fabric. As the standard required rises so does the technical risk and housing providers should have the option to say they cannot achieve a certain standard if it is not technically feasible. There is also a question here about the exemptions already in place, they are described as temporary throughout the consultation but if a measure is not technically appropriate now it will not become so in ten years.

BEFS would add that balancing the need for more social housing, with desire for far greater energy-efficiency, as well as reducing fuel poverty and creating warmer homes for all is a challenging process. Enabling more traditionally built/ pre1919 dwellings to meet the standards through greater understanding of appropriate measures and assessment of these buildings (regardless of tenure) via an improved EPC process would help to achieve the standards being suggested throughout the consultation process.

Use of New Technology

10 What are your views about the proposed approach to recognising new technology in EESSH2?

Question 10: What are your views about the proposed approach to recognising new technology in EESSH2?:

HES state that: New technology will be critical to meeting higher standards, however if it is not recognised by SAP then how will it be measured in terms of compliance with EESSH2 as it will not impact on EPCs.

BEFS would support these comments and add that, There is a wider issue in the need to examine SAP in relation to revising values and archetypes for traditionally built buildings, for example related to solid walls, and other measures which can be taken in relation to window shutters, chimney balloons, curtains etc

If changes can be suggested in relation to new technologies, it would only be fitting to suggest changes in relation to traditional measures too.

2040 Vision

11 Do you have any comments on the EESSH 2040 Vision for:

(a) poor energy efficiency to be removed as a driver for fuel poverty?:

HES It is important to note that fuel poverty is not only caused by building fabric and a wide range of societal factors will also need to be addressed. BEFS support this statement.

(b) social housing to be carbon neutral?:

HES suggest- Carbon neutral is impractical, especially if the carbon cost of the materials used to upgrade the buildings is taken into account. If carbon neutral is being aimed at then this should take into account the anticipated lifespan of the building irrespective of the in-use carbon which the building generates.

BEFS supports this view, particularly in relation to the embodied energy of an older property.

Financial Implications

12 Do you have any views on the assessment of:

(a) costs of EESSH2?:

Reasonable and cost effective measures need to be reassessed in-line with new considerations for SAP and EPC methodologies.

BEFS has concerns about the complexity of the different funding streams for smaller organisations. Funding of assessment, regulation, and inspection – as well as testing of technologies (new/old) in different property types to ensure accurate results for SAP are also not mentioned.

(b) benefits of EESSH2?:

For the benefits to be fully realised suggestions in previous questions in relation to building type/location and accurate assessment would need to be considered and implemented so more of Scotland's housing stock could provide high quality, warm homes for all of the population.

(c) funding implications of EESSH2?:

No comment

About you

What is your name?

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Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:

Built Environment Forum Scotland (BEFS)

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Slightly satisfied

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Very satisfied

Please enter comments here.: