Pace of Delivery, Impact of pace on supply chain, Impact on Fuel Poverty & Climate Change

1. With regards to achieving an accelerated delivery of the standards proposed, do you think mandatory action for owner occupiers would be required? ? Please provide a rationale for your answer.

Yes
Comments:
Many aspects of the improvement of public wellbeing have, over the year, involved mandatory action. From stopping smoking, to wearing seat-belts – issues which it could be argued are far lower monetary cost than the potential investments which need to be made by individuals in relation to climate change mitigation. However, the impact of not smoking, or belting-up can be expressed in very tangible means – everyone is aware of health risks, and car accidents. Reducing ones impact on climate change (even if there is to be a potential financial benefit) lacks the immediacy of stubbing out a cigarette or putting on a seat-belt.
Without mandatory action, incentivised where possible for 'early-adopters' numbers may not meet the stated goals.

The greatest action which could be taken to better reflect the situation of our housing stock, and get more owners to take action, would be a reassessment of how EPC figures are reached.

The methodology for undertaking EPC assessments requires amendment in a number of areas to ensure it is fit for purpose, especially when looking at buildings of traditional construction. Namely:
– Accurate assessment and rating for wall type, including assessment relating to wall thickness
- Assessment and rating of rural properties based on what is feasible (heating type for example)
- Consideration of the significant affect thorough maintenance should have on the rating of a building. Without wind/watertight assessment

and what could be improved through those actions, the suggestion to upgrade some elements to improve EPC rating becomes meaningless - An acknowledgement that EPC ratings assume certain human behaviours which may/may not be met by those within dwellings. (Ie additional suggestions in relation to human actions to improve a building's rating may be a necessary part of the EPC.)

Consider pre1919 housing stock in Scotland - which is some 483,000 homes – would this stock, which when considered under the current assessment standards as not able to meet band C, suddenly be unacceptable as domestic housing? There are also many pre-1919 dwellings where some measures suggested for 'upgrading' may fundamentally damage the fabric of the property and could have negative impacts on the health of the inhabitants.

Current assessment is not accurate for many buildings in relation to shutters, wall thickness, window-type and many other factors. If these buildings were accurately assessed the numbers of buildings either meeting C or, able to meet C with far more minor alterations, could considerable change how easily the target may be met. This would be a win for owners, a win for climate change mitigation, and statistically more accurate.

As ever, these changes would also significantly influence how 'technically feasible and cost effective' any changes to achieve C may be.

2. What trigger points, e.g. sale, renovation, etc. could be used to require owner occupiers to undertaken energy efficiency improvements?

Comments: As many trigger points as are necessary. If registered trades-people were only allowed to fit the most environmentally friendly products (suitable to building type and location) then costs of these products would reduce and some of the necessary changes would automatically take place during renovation.

If EPC ratings were accurate and there was a mandatory move towards C, then at sale the information within the EPC report would

become far more important, incentivising sellers (and perhaps buyers) to make the necessary changes.

However, the skills supply chain (mentioned in later questions) may not yet be able to fulfil demand across property typologies and locations.

3. If you think mandatory action would be required to achieve an accelerated delivery of the standards, when should mandatory energy efficiency targets be introduced in the owner-occupied sector

○ In 2030
Comments: Whilst we do not have 10 years in which to act, within 10 years the: training, skills, supply-chain, EPC re-assessment, and technologies should be in place to enable the most properties able to meet C to have met C. It also enables time for finance schemes to be in place, and early-adoption to be incentivised.

4. From a supply chain perspective, do you think bringing forward the timescales for the Programme would have a positive or negative effect on quality, skills & capacity and consumer protection?

○ Positive
If supported and resourced.
Training needs to start now – we incentive the teacher training programmes, why not the trades and traditional building skills?
The scale of the market should be a great incentive for SME investment and training – evidence within the EES report states: There are approximately 930,000 owner occupied dwellings with an EPC below C which will require upgrading over the next 10- 20 years, depending on the time horizon specified. (And these are only the owner-occupied dwellings!)

Appropriate legislation needs to be in place to ensure correct standards and building typology understanding are in place to protect

consumers and our built environment from incorrect application or misapplication of technologies and techniques.

5. In your view, how would accelerating Energy Efficient Scotland help, and/or how would it hinder, plans to address fuel poverty?

Comments:
Within this area the risks are substantial. A number of those in fuel poverty are in remote and/or rural areas where energy sources may be more expensive.

Without substantial support around investment for private owners, there will be many in fuel-poverty not able to make the necessary adjustments to reap any financial benefits in the longer term.

For those renting (in any capacity) the improvements made by landlords – if made mandatory – could help to lower fuel costs and therefore reduce fuel poverty. Although it is noted that some forms of change to lower carbon energy sources will not necessarily reduce energy costs for the individual. However, the associated changes (if necessary) to make any building more energy efficient should reduce any costs to heat/cool.

Whilst the aim is indeed positive, the outcomes of costly interventions, which may/may not provide appropriately scaled benefits would need to be carefully modelled. Making targets which are not feasible undermines the standards being set, and the outcomes being sought. Additionally, changing the focus to assess the householder (in fuel poverty), rather than the property, could also cause unintended consequences. Householders may move – but the changes related to the property are far more permanent.

6. With regards to reducing the emissions associated with the supply of heat, what are your views on consideration of energy efficient improvements alongside changes to heating systems?

The mechanisms to address climate change should be holistic. Changes to heating systems are often ambitious, but without those changes, the target of carbon zero by 2045 may not be possible.

And public education around behaviour change will be essential to make all the interventions worthwhile. There's no point in installing excellent low-carbon technology and other interventions if it is not used/implemented effectively and efficiently.

Private Rented Sector

7. What are your views on using change of tenancy as a trigger to require the increased standard?

Comments:
Whilst a sensible trigger point, this could have the unintended consequence of reducing the amount of housing to rent 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. 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 rental housing use due to EPC rating/rating potential) is a strategy flawed from both a financial and carbon perspective.

8. What are your views on using 1 April 2025 as the date to start applying the minimum standard of C when there is a change in tenancy?

Comments:
All deserve the right to warm homes, but this could result in a number of properties being removed from the private rented sector. As this would be a shorter timeframe than householders, the private landlord could feel aggrieved. In addition as there are concerns around both the data available, and the skills and supply chain – is enforcing changes on the private rented sector 5 years sooner than other

households, a sensible move which ensures high-quality, appropriate interventions and technologies will be used – interventions and technologies which will benefit not only those renting the properties, but genuinely limit the climate impact each individual property makes.

9. With regards to providing a useful tool to landlords planning and executing improvement works, what are your views on basing any cap of required works on a definition of cost-effectiveness and technical feasibility?

Comments: Cost is one indication. And these cost assessments need to be linked to an appropriately assessed and reviewed EPC rating. Rating which need to take into account simple interventions as well as high-tech solutions. Thick curtains, shutters, chimney balloons, secondary glazing – all of these can make substantial differences to the energy use of a property and are far less carbon-heavy resources in themselves.

And whilst the cost is capped, this does not reflect the complexity of any particular property. Older, traditionally built properties may be disproportionately effected as they may require greater intervention to meet the EPC ratings (especially as they are currently assessed).

A definition of cost effective as one which pays for itself in the lifetime of the measure makes sense. However, this requires accurate data on the expected lifetime of a measure which is produced independently of material manufacturers. If this is to be the measure of whether an energy efficiency measure is to be considered cost effective fresh independent analysis of the payback times will be required.

It is worth noting that if this is the definition of a cost effective measure double glazing is unlikely to be included in applicable measures. Current EPC assessors are not on the whole qualified to carry out such a detailed technical feasibility assessment. Considerable training will be required if this commitment is to be met, with input from specialists in a wide range of measures and building types.

Impact on Supply chain: skills and capacity

10. The Short Life Working Group have made recommendations which they believe represent the actions required to ensure that Energy Efficient Scotland will achieve consistently high levels of quality, health & safety and consumer protection. do you agree? If not, what more or less should be done?

no
If not, what more or less should be done?
Extremely supportive of the recommendations as they stand – but would add:

Changes and improvements to EPC assessors to enable full understanding an assessment procedures for different building typologies, including traditional building forms and buildings of all ages.

Ensure understanding of designers, and installation engineers to comprehend the different needs of older buildings and the different materials that might be encountered during installation and intervention procedures.

11. Do you have any views on how this can be achieved whilst at the same time ensuring maximum participation from suppliers across Scotland regardless of their size and geographical location?

Comments:
Assistance for training schemes, standardisation of methodologies, clear information from a central, trusted source. Interaction with industry bodies and professional organisations to ensure standards apply across the sector.

12. What do you think the role of Scottish Government should be in ensuring the quality criteria are consistently met?

ID is ANON-JH4Z-5R1V-E

Comments:
The role of Scottish Government should be to enable those with the right assessment skills to ensure that industry standards are being met and that Quality is assured for consumers.

Heat Networks

13. Taking the previous questions into account, what further incentives or assistance could drive further heat demand onto networks?

Comments: No comment

14. Taking the previous questions into account, what further assistance could support the growth of approximately-sited, low carbon heat networks?

Add your comments here No comment