

# Home Energy Model: replacement for the Standard Assessment Procedure (SAP) - Consultation

27/March/2024

Built Environment Forum Scotland (BEFS) is an umbrella body for organisations working in the built environment in Scotland. Drawing on extensive expertise in a membership-led forum, BEFS informs, debates and advocates on the strategic issues, opportunities and challenges facing Scotland's existing built environment. BEFS is a supporting member of the [Climate Heritage Network](#).

Page | 1

Other relevant consultation responses from BEFS can be seen below, as many issues overlap and demand associative consideration:

- DELIVERING NET ZERO FOR SCOTLAND'S BUILDINGS – HEAT IN BUILDINGS BILL : CONSULTATION (08/03/2024)
- [ENERGY PERFORMANCE CERTIFICATE REFORM \(16/10/2023\)](#)

BEFS will be responding only to relevant questions of the consultation, as below:

## Chapter 3: A new home energy modelling ecosystem

### **4 What are your views on using the open-source code as the approved methodology for regulatory uses of the Home Energy Model? Please provide your reasoning and any supporting evidence.**

BEFS is broadly in agreement with the principle of using open-source code as the approved methodology and would support Historic Environment Scotland (HES) view that this *'would require an assessment of the risk of modifications which could inadvertently or purposefully affect the underlying principals of the Home Energy Model. Where such a risk is identified, preventative measures should be put in place.'*

### **5 What forms of collaboration would you be interested in for future development of the Home Energy Model codebase? Please provide further details.**

BEFS would support a collaborative approach and would highlight the opportunity for a code that considers traditional buildings.

### **6 What are your views on our assessment of issues with the current SAP delivery model? Please provide your reasoning and any supporting evidence.**

BEFS broadly agrees with the assessment.

### **8 What are your views on revising the database of product characteristics (currently the "PCDB") for the Home Energy Model? Please provide your reasoning and any supporting evidence.**

BEFS would highlight HES comment that *'care needs to be taken in the use of manufacturers' data around the performance characteristics of a specific product. There is potential risk in assuming that product data is accurate'* and that *'data collection procedures should be independent of product manufacturers, to ensure accurate and impartial data.'*

## Chapter 4: The new Home Energy Model – an overhaul

### **17 What are your views on the ability of the Home Energy Model to model energy flexibility and smart technologies? Please provide your reasoning and any supporting evidence.**

## Home Energy Model: replacement for the Standard Assessment Procedure (SAP) - Consultation

27/March/2024

BEFS would also highlight HES comment that *'the ability of the Home Energy Model to model energy flexibility is welcome. It is important that this takes into consideration the performance characteristics of traditional buildings – for example, the way in which thermal mass can balance heating and cooling. Including consideration of overheating of buildings is also important in this context.'*

### Chapter 5: What is inside the Home Energy Model?

Page | 2

#### 18b What are your views on the methodological approach for calculating fabric heat loss? Please provide your reasoning and any supporting evidence.

BEFS recognises the work undertaken towards an accurate approach. We agree with HES view that *'the key for ensuring that traditional buildings are properly treated comes in ensuring that U-values which underpin the assessment – particularly for walls – are accurate. Considerable work has been undertaken within RdSAP to ensure that this is now the case. It is important that this work carries over into the methodology underpinning the Home Energy Model.'*

#### 18d What are your comments on the methodological approach for calculating infiltration and/or controlled ventilation? Please provide your reasoning and any supporting evidence.

BEFS has previously noted that traditionally constructed buildings and modern constructed properties differ in how they function; as such a more nuanced approach to measuring energy efficiency to accurately reflect performance is required. As HES states *'care needs to be taken to ensure that the performance of traditional buildings is accurately reflected, and not penalised due to a lack of data around airtightness'*.

---

BEFS responses to a number of Consultations in relation to the Built Environment can be found at:

<https://www.befs.org.uk/resources/consultations/>

#### RESPONDENT INFORMATION

Name: Hazel Johnson, Policy and Strategy Manager

Email: [hjohnson@befs.org.uk](mailto:hjohnson@befs.org.uk)

Responding on behalf of an Organisation - **BEFS** (Built Environment Forum Scotland)

Address and Postcode: 61 Dublin Street, Edinburgh, EH3 6NL

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**

I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy. **I CONSENT**