

Consultation on indicators for the Energy Efficiency Standard for Social Housing 2: Consultation questions

We welcome your general feedback on our proposals as well as answers to the specific questions we have raised. Please do not feel you have to answer every question unless you wish to do so.

Send your completed questionnaire to us by **15 January 2021**.

By email @: shr@shr.gov.scot

Or post to: Scottish Housing Regulator
Buchanan House
58 Port Dundas Road, Glasgow, G4 0HF

Name/organisation name

Falkirk Council

Address

Corporate & Housing Services,

Suite 4, The Forum,

Callendar Business Park,

Falkirk.

Postcode FK1 1XR

Phone

Email

How you would like your response to be handled

To help make this a transparent process we intend to publish on our website the responses we receive, as we receive them. Please let us know how you would like us to handle your response. If you are responding as an individual, we will not publish your contact details.

Are you happy for your response to be published on our website?

Yes

If you are responding as an individual ...

□□□

Please tell us how you would like your response to be published.

Pick 1

Publish my full response, including my name

Please publish my response, but not my name

1. Is there anything not covered by the proposed indicators? (if yes, please explain)

The proposed indicators represent a logical evolution from the EESSH 1 indicators which are well understood. However, we feel it is important that some sort of early mechanism is provided for the collection of the additional data from January 2021 in preparation of the indicators from 2025 onwards i.e. the proposals in respect of monitoring: the Environmental Impact rating of properties; and, the air quality impact data for energy efficiency measures.

2. Are there any indicators that you feel are not appropriate and, if so, why?

The proposed indicators are appropriate and represent a logical evolution from the EESSH 1 indicators which are well understood.

3. Is there any information we ask for that you feel does not need to be included or that we have been missed?

We feel it may be worthwhile to require returns to include an indication of the EPC Methodology used to arrive at the energy performance results as it is recognized that there can be a variance between the Energy Performance and Environmental Impact outputs from the various different SAP methodologies i.e. The EESSH 2 Draft Guidance document (Page 3, #22) notes *“Different versions of SAP may produce different results. The overall rating band for energy performance is the same for all versions of SAP. The SAP guidance includes conversion tables from previous versions of SAP. Differences between ratings will also be affected by the differences in the range of data collected in different versions of SAP”*. Including reference to the methodology in the return may assist when comparing results from returns and would help to illustrate the reasons for the evolution and changes in performance levels due to changes in the methodology from the outset and going forward into the future.

We also feel it would be useful to include information on the SAP conversion tables in any finalised EESSH 2 Guidance document to alleviate any confusion or difficulties in finding that information.

4: Would you like to make any other comments or suggestions about our proposed indicators?

As mentioned in question 1, we feel it is important that some sort of early mechanism is provided for collection of the additional data from January 2021 in preparation of the indicators from 2025 onwards i.e.

1. It would be useful to have a formalised mechanism for data collection and further guidance on the proposed indicator for meeting the Environmental Impact part of the EESSH 2 from 2025, particularly given that the EESSH2 Draft Guidance document (Page 9, #52) indicates *“landlords should start to collect the modelled environmental impact of energy efficiency measures in EPCs”* and, *“For the period up to 2025, this data will be used to assess how an environmental impact element in the milestone would affect energy efficiency projects, but will not be required as a formal target to assess landlords’ performance”*.
2. It would be useful to have a formalised mechanism and further guidance on the proposed indicator for air quality in the EESSH 2 from 2025, particularly given that the EESSH 2 Draft Guidance document (Page 10, #58) indicates *“landlords are encouraged start to collect the air quality impact data for energy efficiency measures. This means before and*

after installation data on carbon dioxide, temperature and humidity. Where practical, monitoring equipment should be factored into the cost of investment projects. For the period up to 2025, this data will be used to assess how energy efficiency measures affect air quality, but will not be required as a formal target to assess landlords' performance”.

We also feel it is vitally important that we receive some clarity in terms of what the acceptable safe environmental threshold levels are in terms of air quality as there seems to be a distinct lack of guidance and consistency in information available. It is essential to know what parameters we should be measuring our data against in order to identify any problems arising from energy efficiency work undertaken. In addition, It is a matter of concern that there seems to be a lack of expertise in the industry for the diagnosis of air quality issues and the provision of remediation measures to address any issues identified.

Thank you for taking the time to give us your feedback!