

**From: Councillor Dick Wolff**

**To: Housing Panel (Panel of the Scrutiny Committee)**

**Date: 5 October 2016**

**Title: Submission on item 6, Energy Strategy – Housing and Property**

Can I please ask that the following two points are raised in the meeting:

1.

Energy Performance Certificates (EPC). see p.38 and especially p.41 of the Housing Energy Strategy Report, where it indicates that these are being used as the measurement of energy performance of buildings.

They are no such thing. The Standard Assessment Procedure (SAP) that results in an EPC -- which does not generally require any actual tests on a property -- is deeply flawed and in my experience gives an extremely optimistic estimate of a property's energy usage. For example, the EPC's estimated energy usage for space heating on a new-build property that I have just bought is 4600 kWh a year; the professional heating firm I engaged to install an air-source heat pump energy system (and who therefore needed an accurate assessment in order to design the system) produced a detailed 147 page report based on an actual survey which estimated the energy usage at 18,500 kWh. A margin of error approaching 400%.

If the City Council uses EPC's as a measure, people in real fuel poverty will not be identified. Further, grants for improving the energy efficiency of buildings will not be got, because the highly optimistic EPC figures will render it impossible to improve the performance. My new-build house, according to its EPC, is almost a passivhaus (which typically achieves 3,000 - 3,500 kWh pa and requires no heating system).

Inspection regimes on new build are not truly independent because the developers engage their own private inspectors. The City Council needs to be carrying out its own inspections on its new-build properties -- it costs around £300 per property (less for a number of properties in close proximity to each other). Of ten or so properties on the new-build estate that my house is on, ALL of them failed first time round, and only scraped through the legal building regs minimum after holes were retrospectively plugged. The build quality is poor. The inspector that failed them, incidentally, got the sack.

Scrutiny Panel should considering recommending that the City Council conduct truly random independent (of the developer) testing of all social housing properties before accepting them. All new housing should achieve an air tightness maximum of 5 m<sup>3</sup>/m<sup>2</sup> @ 50pa on test.

Scrutiny Panel should consider recommending that research is done into the predicted energy usage of our properties (from their EPCs) against the actual usage

of our tenants, in order to test what I'm saying here. It is not enough to rely on EPCs.

2.

There is little mention of heat pumps in this report -- a startling omission. For 1kW of electrical energy input a modern air-source heat pump produces 3kW of hot water at 55°C -- a far better performance than a condensing gas boiler, and not dependent on fossil fuels (see third bullet point p.41, and p.42)

Scrutiny Panel should recommend the inclusion of training in heat pump technology e.g. under para 2, p.45. and including heat pumps in the council's recommendations, where appropriate.

3.

At various points there is mention of the additional cost of gas from pre-paid meters. My understanding that the tariffs of Equigas (a local energy supply company) do not penalise pre-paid meter users in this way. That's why I switched to Equigas many years ago.

Scrutiny should recommend that Equigas is investigated as supplier to all our properties, and especially those on pre-paid meters.