

**From: Debbie Haynes**

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

**Date: 10 October 2016**

**Title: Response to submission on item 6 (Energy Strategy – Housing & Property)**

Officer responses to Councillor Wolff's points are in **Bold**.

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).

**Officers agree that EPCs are not always known for their accuracy and bear this in mind with any work they use them for. However, we are obliged to use them to meet our statutory obligations under the Energy Act 2015. This states that we will be unable to re-let properties not meeting an Energy Performance Certificate rating of E come April 2018 and it will be unlawful to have any rented out properties lower than this rating from early 2020. Available funding is also determined by Energy Performance Certificates and this enables us to carry out energy efficiency works that we otherwise couldn't. Therefore we do need to use them to set a minimum standard and to reduce fuel poverty in our social housing.**

**However, we would like to reassure Cllr Wolff that we also use a lot of other data to add to the accuracy of the EPCs and also set helpful 'minimum standards' – ie minimum 270 mm of insulation in the loft of each home, and removal of inefficient gas boilers as part of the boiler replacement programme.**

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 m3/m2 @ 50pa on test.

**Draughts are an issue for thermal comfort. However, air tightness and ventilation is relatively complex – one needs to compliment the other and any airtight solution would need to be matched with a suitable ventilation solution.**

**The Council's future social housing will be guided by a minimum standard in BRE's Home Quality Mark, focussing on a fabric first (ie making sure minimum heat is lost from the building therefore reducing the need for heating). We will be carefully considering the balance of air tightness v's appropriate ventilation to ensure the properties remain healthy – warm with appropriate air flow to prevent damp and mould. The maximum air tightness will be considered as part of this process.**

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.

**Officers will continue to look into this where a cost effective option is available, including local students/ universities.**

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.

**Heat pumps have been used in the past in our social housing but there are issues if they don't meet the 1kW to 3kW performance. Heat pumps act as a heating system for both water and the building itself. If these are not easy for**

**tenants to use or aren't performing as well as manufacturers say they will, there is a high risk that they could actually put tenants into fuel poverty.**

**The Council continues to evaluate new and existing renewable/low carbon technologies as referred to in the Energy Strategy and will continue to evaluate the appropriateness of Heat Pumps alongside other options as budget permits.**

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.

**There are a number of issues around the appropriateness of tariffs and this does tend to vary quite a lot from individual to individual. Organisations like Equigas and Ebico who offer a fairer rate for pre payment meters are vital in the energy market. However, due to the existence of financial incentives for those on low incomes or of a certain age such as the 'Warm Homes Discount' (£140 to eligible recipients), insisting on one provider could mean that tenants actually lose out.**

**Please contact our energy advice officers on [energyadvice@oxford.gov.uk](mailto:energyadvice@oxford.gov.uk) if you come across council housing tenants who are struggling to pay energy bills or need advice on the best energy provider and tariff.**

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