

SUBMISSION FROM PROFESSOR SEAN SMITH

RPP2 – Homes and Communities

Retrofit: Green Deal / ECO / NRP

1) Importance of Fitting the Right Solutions

The RPP2 will require substantial efforts to be made to improve the existing housing stock to reduce carbon emissions and also to the commercial and public sector building stock.

Scotland has 1:11 of the UK population, but has 1:6 of the IMD (Indices of Multiple Deprivation) across the UK and within Scotland almost 1:3 households are in fuel poverty.

The National Retrofit Program, ECO and Green Deal provide various routes and pathways to improve the building stock, reduce energy consumption and reduce carbon emissions. **However, it will also be important that the solutions to improve such building stock are reliable, will reduce energy consumption and have been independently assessed.**

- a) If the roll out of such programs does not deliver the intended savings in costs, energy and carbon then what is the “Plan B”?
- b) Furthermore, if various solutions are fitted and don’t deliver then the Government and industry may lose the “hearts and minds” of the public to engage with any such works in the future.
- c) It will be important that the ECO and Green Deal are using similar benchmark data in how the carbon savings are being made and it would be useful to know how the utility companies intend to ensure there is parity in measures and carbon reduction planning.
- d) A potential factor which may delay take up of Green Deal is the alignment of the “debt to the property” as under Scots Law this may be difficult to enact.

2) Scottish SME Energy Reduction Solutions for Green Deal – Barriers to entry

At present for a Scottish company to enter their products into the Green Deal “compliance route” they will require testing of their insulation products (solutions) within a UKAS accredited laboratory, which is listed under Appendix Q of the Green Deal. Twelve laboratories are listed and one is in Scotland. Having reviewed the UKAS capabilities of this lab these are not relevant to Green Deal. Having then searched for the next available laboratory (in North of England) this is also not relevant to Green Deal.

It appears there are only two laboratories in the UK (both in South of England) which can measure and declare thermal performance of products. Recently we spoke to Scottish SME’s about their trials of entry into Green Deal. One company stated “it took over 12 months to get a QUOTE to do the testing of their product for Green Deal entry”.

- a) This suggests that new innovative products and solutions will struggle to get into the Green Deal, particularly for building fabric solutions.
- b) As Scotland has no national test laboratory to undertake such testing Scotland PLC is at a considerable disadvantage which will affect jobs, turnover and economic growth for companies dealing with retrofit.
- c) This is the largest construction / regeneration program for the next two decades and Scotland may be hindered from entry into this market.
- d) Finally and crucially, the entry to green deal is at present based on a lab test. Given the partnership of solutions which are required on a "house or flat type" it would be more practical and prudent to have "house type solutions" prepared and independently assessed to deliver the energy, cost and carbon reductions. Thus the intended savings outlined in the RPP2 must be queried on the basis of what evidence or field trials have been produced to come to the figures listed in the RPP2.

3) Not meeting the Green Deal "Golden Rule" – implications for ECO and Utility companies

Recent presentations by a number of different research organisations have stated the difficulty for current retrofit measures to meet the Golden Rule for the "Green Deal".

If there is a blockage and significant delay for new products solutions and innovations to enter into the Green Deal and current solutions are limited in meeting the "golden Rule" – this would potentially result in the RPP2 not being able to deliver its intended objectives.

If the "Golden Rule" cannot be met this places potentially more pressure on the Utility companies to use ECO as the main pathway. **What additional resources are the utility companies putting in place to be able to resource what could be an expanding ECO program?**

4) RPP2 - Page 163 Table – "Additional Technical Potential in Fabric...."

We strongly query what these measures may be as there is not detail as to proposed measures or solutions within the RPP2. **It would be interesting to know if the Utility companies are aware of the solutions which would achieve such reductions, which according to Page 163 – would be far greater than the combined efforts of ECO/Green Deal and NRP".**

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