

Response ID ANON-AKX4-WTEU-W

Submitted to **Proposed Changes to the Government's Standard Assessment Procedure (SAP)**

Submitted on 2017-01-25 15:27:28

Questions

1 Do you agree with the proposal to use the methodology set out in the technical working paper for calculating carbon emission factors and update the figures?

Please add text here:

2 Should we keep the current set of heating patterns set out in SAP or move to using two heating periods every day of the week? Please provide supporting information for your view.

Please add text here:

3 Do you agree with the proposal to amend default Distribution Loss Factors for Heat Networks?

Please add text here:

4 Do you agree with the proposal to change the way that lighting is calculated in SAP?

Please add text here:

5 Do you agree with the proposal to remove the default values in Table K1, review default values as proposed, and recognise Certified Thermal Details and Products schemes? Do you agree with the proposal in due course to amend the default γ -value to 0.2?

Please add text here:

6 Do you agree with the proposals to adjust U-values and Ψ -values for elements next to unheated spaces?

Please add text here:

7 Do you agree with the proposal to change the default U-values for walls for existing buildings in RdSAP?

Please add text here:

We welcome the reduction in the U-values for solid wall construction and are pleased to see progress in accepting that older buildings perform better than has previously been suggested and that retrospective insulation may not be so cost effective or necessary.

There is no mention of the research by the Society for the Protection of Ancient Buildings (SPAB) (see <https://www.spab.org.uk/advice/energy-efficiency/>), Historic England and Historic Environment Scotland where actual solid-walled buildings were tested and found to behave very differently than computer-modelled solid walls. There is also no acknowledgement of other authoritative research such as that undertaken by BRE. The lack of mention of this is particularly strange as BRE are holding the draft specifications of SAP.

We recommend that BEIS take account of this research so that work undertaken to solid-walled buildings as a result of the RdSAP assessments does not cause unintentional damage or other consequences further down the line.

8 Do you agree with the proposal to amend the hot water methodology in SAP?

Please add text here:

9 Do you agree with the proposals to change the questions in the assessment of internal temperature in summer (Appendix P)?

Please add text here:

10 Do you agree with the proposal to amend the treatment of Mechanical Ventilation Systems in SAP?

Please add text here:

11 Do you agree with the proposal to change the assumed air flow rate for chimneys and flues in SAP?

Please add text here:

12 Do you agree with the proposal not to alter assumptions on storage heating secondary fractions in SAP?

Please add text here:

13 Do you agree with the amendments proposed to solid fuel heating efficiencies?

Please add text here:

14 Do you agree with the proposal to amend the procedure for determining overshadowing of solar PV installations?

Please add text here:

15 Do you agree with the approach to adjust the carbon savings where solar PV electricity is used in the home to heat water or where it is put into battery or other storage? Do you have a view on the correct export tariff for PV electricity exported to the grid? Do you have ideas on how solar thermal space heating, or storage of solar PV or hot water through a battery or other medium can be modelled?

Please add text here:

16 Do you agree with the proposal to provide a series of seasonal efficiencies for boilers on the Product Characteristics Database dependent on the controls they use and the design flow temperature of the system? Do you agree with the proposed change to the Energy Balance Validation method?

Please add text here:

17 Do you agree with the proposal to amend the default values for some heat pumps based on evidence from RHPP field trials?

Please add text here:

18 Do you have any evidence on the technology costs used in RdSAP?

Please add text here:

19 Do you have any evidence to update the assumptions that SAP makes about heating controls?

Please add text here:

20 Can you provide any evidence on the cost and benefits to business of revisions to SAP independent of changes to any particular set of Buildings Regulations?

Please add text here:

21 What is your name?

Name:

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23 What is your organisation?

Organisation:

The Chartered Institute of Building