



HISTORIC  
ENVIRONMENT  
SCOTLAND

ÀRAINNEACHD  
EACHDRAIDHEIL  
ALBA

**By email to:**  
[SEEPconsultation@gov.scot](mailto:SEEPconsultation@gov.scot)

SEEP Consultation  
SEEP Consultation Team  
Scottish Government  
1H South  
Victoria Quay  
Edinburgh EH6 6QQ

Longmore House  
Salisbury Place  
Edinburgh  
EH9 1SH

[adele.shaw@hes.scot](mailto:adele.shaw@hes.scot)

T: 0131 668 8758

Our ref:  
Our case ID: 300019314

26 May 2017

Dear Sir/Madam

**Scottish Government - Energy Strategy - Scotland's Energy Efficiency Programme (SEEP) National Infrastructure Priority for Energy Efficiency**

Thank you for your consultation on options for the programme and policy design of Scotland's Energy Efficiency Programme (SEEP).

We welcome the continued work being undertaken on SEEP. However, overall there are a number of issues which we recommend are taken into account. Firstly, there is the role of existing housing infrastructure in relation to sustainability. A refurbished house will always be more green than the demolition (and loss of embodied energy) and construction of a new house. There is a need to find ways to upgrade existing housing stock successfully. Secondly, there is a real need for special considerations for traditional buildings. They need different solutions than post-1919 housing as they were constructed differently and require appropriate ventilation in order to 'breathe'. There are recent examples of poorly considered and executed schemes which illustrate the need for a clear and up to date understanding how traditional buildings work to support the delivery and implementation of SEEP.

We have reviewed the document and the consultation questions for our historic environment interests and have the following comments to offer.

*What currently works well, including aspects of existing schemes that should be retained?*

Home Energy Scotland have expertise in dealing with traditional buildings. We have assisted in several talks and roadshows with them in the last few years and welcome the opportunity to continue to work with them. We consider that their role is critical in the



implementation of SEEP and we recommend that their role in relation to traditional buildings is enhanced and expanded.

*What are the main delivery challenges faced at present and how might these be overcome?*

There will be a need to address challenges which exist in relation to knowledge and skills. In order to ensure measures are appropriate to a diverse range of building types including traditional, non-traditional etc. a good level of understanding about how these building types work and how they react to different energy efficiency improvements is important to ensure measures are not going to cause long term damage to a building. A lack of knowledge at all stages of the planning, specifying and installation of energy efficiency measures may prove a barrier to the delivery of SEEP. A further barrier may be the use of a limited range of materials and methods which has been a problem with previous national retrofit programmes. This is exacerbated by a reliance on modelling software to supply recommendations rather than an in depth understanding of the building being worked on. Solutions for new buildings which are then applied to old often make things worse.

*How can Scotland best meet this vision and underpinning objectives in a way that is both socially and economically sustainable and supports long-term inclusive growth?*

Investment in skills and knowledge will be crucial as discussed above. It is also important that restrictions on who can deliver the measures are removed where possible (for example a need to meet PAS2030) otherwise the scheme will rely on a small number of national contractors. It is also important to note when considering health benefits to note that these are only realized if measures are appropriate and take into account matters such as ventilation as there is the potential for health to be compromised rather than improved by poorly considered schemes.

*How might regulation and standards be used most effectively across the different sectors and when should they be applied across the lifetime of the programme?*

When considering standards it is important to note that there may be instances where for technical or legal reasons a standard cannot be met. For example, loft insulation may not be appropriate if there are protected species in the roof space, solid wall insulation may not be appropriate for some forms of timber frame construction etc.

*What should be the trigger points for buildings to meet standards? Should this differ between domestic and non-domestic buildings, and if so, how?*

As noted above, there will need to be a more nuanced approach taken for traditional buildings. This applies to both domestic and non-domestic traditional buildings.

*What do you think are the benefits of using financial and fiscal incentives to support energy efficiency in domestic and non-domestic buildings?*



There is a lack of specific assistance for traditional buildings or designated historic assets. For example to repair sash windows or to carry out sympathetic upgrading of them. It may be preferable to adapt an existing grants scheme to accommodate the needs of traditional buildings. This could then focus on appropriate measures for improving their energy for example by using sheep's wool insulation or by installing secondary glazing.

*How do we ensure that householders and owners are well advised and supported in making decisions on how to improve the energy efficiency of their building and install lower carbon heat supply through SEEP?*

It is important to ensure that those providing the advice have the correct level of understanding around different building types and a wider range of measures. It is also vital that the advice is free from any links to installers or manufacturers of particular products. When considering building trust in SEEP the avoidance of failures in buildings is critical which links to the requirements for increased knowledge and skills considered above. It is also critical that any monitoring of work and consumer redress takes a long term view as problems may take some time to become evident

*What do companies need to do to increase their skills base to deliver a programme of this nature?*

To increase skills companies must look beyond simply training in the installation of one system or product and enhance their knowledge of different building types and how they may be improved. There is a real risk to traditional buildings from a one size fits all approach is likely where a company can only work with one system and will install that to all building types, which may harm the character or special interest of these assets.

*What roles should national and local bodies play respectively in delivering SEEP and how can national and local schemes best be designed to work together towards meeting the Programme's objectives?*

Through our research in to the performance of energy efficiency measures for traditional buildings, Historic Environment Scotland is able to help with providing information and advice on suite of tried and tested improvements which have been successfully installed to traditional buildings. We would be happy to provide further advice as the policy for the design and operation of SEEP progresses.

*What are your views on the relative benefits of area-based schemes as against those targeted at particular sectors or tenures in delivering SEEP? What other targeting approaches might be effective?*

Whilst area based schemes may be beneficial in terms of economies of scale, it is important to note that not all buildings in particular area are of the same construction type and what is appropriate for one building may not be appropriate for the building next door. This ties in with increasing the knowledge and skills of those delivering the scheme.



HISTORIC  
ENVIRONMENT  
SCOTLAND

ÀRAINNEACHD  
EACHDRAIDHEIL  
ALBA

We welcome the acknowledgement that a one size fits all approach may not be appropriate in paragraph 56 and we recommend that traditional buildings are considered in this way in the final policy design.

*What should be included in a monitoring framework to ensure that the Programme is effectively monitored and evaluated?*

A monitoring framework must include detailed reviews of work but independent assessors who understand the requirements of different building types. It is also crucial that this review process does not just take place immediately after measures are installed but at intervals afterwards, for example after 1, 5 and 10 years to ensure that long term problems are picked up.

We hope this response is helpful to you. We would be happy to provide further advice for our interests as the development of the policy design progresses.

Yours faithfully

**Historic Environment Scotland**