

# Consultation on the Standard Assessment Procedure (SAP)

September 2009

Northgate Public Services Response

## Response

1. Northgate welcomes the opportunity to respond to the technical consultation on the proposed amendments to the Standard Assessment Procedure (SAP) methodology.
2. This brief response draws on our experience of working for over fifteen years in innovative partnerships designed to promote energy efficiency and develop sustainable communities, as well as working with a range of stakeholders in the field of energy efficiency including local authorities, surveyors, architects and most recently energy assessors. We are active users of the government's methodological tool for measuring the energy efficiency of dwellings.
3. We welcome the amendments to SAP which will help to make the next version a more efficient and effective tool for measuring the energy efficiency of dwellings. As with all versions of SAP it is critical that developers and users are made fully aware of the changes so that the variance between SAP 2005 and SAP 2009 is fully understood.
4. We have some concern about the proposed amendment to adopt a monthly calculation for SAP. A seasonal method has been sufficient for conventional dwellings and whilst a monthly calculation is more appropriate for very low energy dwellings, it is not clear how many of these it is anticipated there will be during the lifetime of SAP 2009. We are concerned that its adoption may, therefore, be too early, and that it could lead to confusion for developers with a large number of new dwellings. (Q.1)
5. It is good that the weather data has been updated given that SAP is currently based on long term data relating to the 1960s and 1970s and since then there has been marked warming. Whilst the suggestion to include future forecast data within SAP may be of academic interest, we are not convinced that it would be of particular use to the SAP user because of the inaccuracies connected with forecasting. If such data were to be included we would propose that it is limited to the lifetime of the particular version of SAP. (Q.2)
6. We believe that the carbon dioxide emission factor methodology is appropriate. It provides a consistency of methodology which will enable improvements in stock to be measured over time. We agree that the emission factors should be reviewed again in 2013 at the end of the life time of the current version of SAP to ensure that they are appropriate for the future. (Q.3)
7. We agree that there needs to be a new way of treating boiler heating systems under SAP and think that the methodology proposed has dealt with the fact that the efficiency of boilers has been assumed to be higher in the past in an equitable manner. (Q. 7)
8. In the long term, we believe that there is a strong case for making SAP ratings regionally dependent as it will help to improve decision making and have more relevance to the property. However, this should not be introduced at the cost of having a national picture on the improvement or otherwise being made in stock. This could be realised through statistical adjustment of regional data to create a consistent national analysis of performance. (Q.12)

9. We think that the amendments made to the hot water heating procedures are appropriate and that it would make sense to have variable assumptions about primary pipe-work losses and secondary (distribution) losses as with the introduction of thermal stores and solar heating it is likely that more properties will have plant rooms / areas of garages etc with rather than the traditional cylinder in an airing cupboard on the landing.

### **For more information**

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