

Hi, I would refer to the EESSH2 consultation attached and advise that the Aberdeenshire Council response is set out below. The response can be published on the website under the name Aberdeenshire Council.

- 1. Is there anything not covered by the proposed indicators? (if yes, please explain)**
- 2. Are there any indicators that you feel are not appropriate and, if so, why?**
- 3. Is there any information we ask for that you feel does not need to be included or that we have been missed?**
- 4: Would you like to make any other comments or suggestions about our proposed indicators?**

Response and general feedback:-

- The indicators proposed for EESSH2 seem relevant and appropriate compared with those for EESSH. There is however no mention of overall carbon monitoring and the impact related to Net Zero 2045. Separately it would assist planning for EESSH2 if a definitive explanation of what Net Zero actually is and how it is to be calculated as there would seem to be no formal guidance available and various interpretations being used.
- Concerning EPCs and the modelling/ cloning of data being used for reporting would it be useful for comparison purposes to include the % of properties with an actual EPC and the % cloned?
- The Reality Gap. The EPC process does not take account of a number of factors including tenant lifestyle. Should consideration be given especially when considering air quality monitoring how different tenant lifestyle will affect results and will detailed guidance on monitoring be provided?
- At point 1.5 no heating type information is to be provided and this is presumed because the focus is to remove gas and progress electrification?
- At point 1.6 carbon is mentioned but should there be more linkage with Government Policy on overall carbon reduction?
- At point 5.2 & 5.3, it is advised that Scottish Government plans to develop guidance on air quality. Is there any indication of when this will be with the formal review of EESSH2 now brought forward to 2023? If the formal review is now 2023 then a 9 year time period between the review and the 2032 milestone is still a relatively short window within which to implement any additional requirements, especially if they are far reaching. Also, between now and 2023 is now only 2 years away so this doesn't give much time to collect before and after air quality impact data that I believe is needed for the review?