
Energy Efficient Scotland: Improving energy efficiency in owner-occupied homes

Analysis of responses to the public consultation exercise



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Executive Summary

1 Introduction

This report presents analysis of responses to the Energy Efficient Scotland: Improving Energy Efficiency in Owner-Occupied Homes public consultation. The consultation exercise ran from 19 December 2019 to 9 April 2020.

The Scottish Government received 148 responses to the consultation and this report presents the analysis of these responses.

Table 1: Breakdown of respondents with organisational respondents classified by organisation sector

Category	Number of respondents	Percentage of respondents
Organisations	69	47%
Academics	2	1%
Building component manufacturers or services	4	3%
Community group	3	2%
Energy-related private sector	13	9%
Local authority or interagency partnership	10	7%
Anonymous organisation	1	1%
Private landlord or property management	1	1%
Professional or representative body	24	16%
Public sector or body	2	1%
Scottish Government delivery partner	2	1%
Third sector	7	5%
Individuals	79	53%
TOTAL	148	100%

2 Background

Improving the energy efficiency of buildings in Scotland is an important aim for the Scottish Government, particularly in contributing to priorities around fuel poverty¹

¹ The Fuel Poverty (Targets, Definition and Strategy) (Scotland) Act 2019 (<https://www.gov.scot/policies/home-energy-and-fuel-poverty/fuel-poverty/>) defines a household as being in fuel poverty if, “after housing costs have been deducted, more than 10% (or 20% for extreme fuel poverty) of their net income is required to pay for their reasonable fuel needs; and if, after further adjustments are made to deduct childcare costs and any benefits received for a disability or care need, their remaining income is insufficient to maintain an acceptable standard of living, defined as being at least 90% of the UK Minimum Income Standard”.

(by ensuring that homes are more affordable to heat) and climate change (by helping to reduce emissions of greenhouse gases).²

In 2018, the Scottish Government published the Energy Efficient Scotland Route Map, a 20-year programme aimed at making Scotland's buildings warmer, greener and more energy efficient.³ The Route Map set out proposals that all owner-occupied homes should reach Energy Performance Certificate (EPC) Band C by 2040, including consideration of a mandatory requirement to reach this standard from 2030. An update to the Route Map will be included in the Scottish Government's draft Heat in Buildings Strategy, which will be published in February 2021.

The Scottish Government conducted a consultation in 2019 to inform further development of the Energy Efficient Scotland programme.⁴ The findings of this consultation, together with the increasing focus on the climate emergency, led to the Scottish Government committing in its Programme for Government 2019-20⁵ to publish proposals to accelerate the timescale for improving energy efficiency standards in owner-occupied housing.

Following this, the Improving Energy Efficiency in Owner-Occupied Homes consultation document set out the Scottish Government's proposals for the nature of the proposed standard for owner-occupied homes and for the intention to make this legally-binding from 2024. The consultation invited feedback from the public to help shape plans for improving energy efficiency in owner-occupied housing.

3 Approach to the analysis

The consultation involved a questionnaire with 32 questions, of which 23 were free-text and nine had both a multiple choice and free-text component.

Responses to the multiple choice questions were quantitatively analysed and a breakdown of responses by respondent type and organisation sector is presented in Appendix 1. Responses to the free-text questions were coded into relevant themes and sub-themes and the analysis of these is presented in this report.

The key findings from the analysis are outlined next.

² Energy Efficient Scotland: Improving Energy Efficiency in Owner-Occupied Homes – Consultation Paper <https://www.gov.scot/publications/energy-efficient-scotland-improving-energy-efficiency-owner-occupied-homes/>

³ Energy Efficient Scotland: Route Map <https://www.gov.scot/publications/energy-efficient-scotland-route-map/>

⁴ Energy Efficient Scotland: Consultation of Further Development of the Programme <https://www.gov.scot/publications/energy-efficient-scotland-consultation/>

⁵ Scottish Government, Programme for Government 2019-20 <https://www.gov.scot/publications/protecting-scotlands-future-governments-programme-scotland-2019-20/>

4 Levels of agreement with the proposals in the consultation document

Views on whether there should be a legally-binding standard were mixed, with 55%⁶ of those who answered the question agreeing that there should be a legally-binding energy efficiency standard for owner-occupied housing, and 45% disagreeing. Organisations were more likely to support this proposal than individuals.

There were also mixed views about the suitability of EPC Band C as the required standard. A small majority of respondents (54%) agreed that EPC Band C should be the standard required to be met by homeowners. Again, organisations were more likely to agree with this than individuals. However, 46% of respondents disagreed and a substantial number raised concerns about the effectiveness of the EPC including among them half of the professional bodies responding to the consultation.

The balance of opinion was not in favour of 2024 as the date to introduce the mandatory standard. More than half of respondents (62%) disagreed with this proposal, with many stating that it was too early, although organisations (60%) were more likely to be in favour of this start-point than individuals (23%).

A majority (57%) agreed that the point of sale should be a trigger point for a property to meet the legally-binding standard. However, some (43%) disagreed, with concerns that this could negatively impact on the housing market.

Support for the point of major renovation being a trigger point was stronger, with many respondents (72%) agreeing with this proposal. Agreement levels were particularly high among organisations (90%). Views among individuals were more varied (59% agreed), with some concerns about the additional costs being added to already costly renovations.

Many respondents (70%) supported the proposal that, even if a property cannot fully meet the standard, it should be required to get as close as possible to it.

There were mixed responses to the proposal that any exemptions or abeyances from the standard should be time-limited. Overall, 56% of respondents agreed, and organisations (85%) were more likely than individuals (39%) to be in favour of this.

Many respondents (62%) agreed that grant funding from the public purse to support homeowners to meet the standard should be focused on households that are vulnerable or in fuel poverty. Organisations (85%) in particular were mostly in favour of this, although views were more mixed among individuals (46% agreed).

⁶ The percentages presented in this section refer to the percentage of respondents who answered the individual question being analysed, rather than the percentage of all respondents to the consultation.

5 Cross-cutting themes

In addition, a number of cross-cutting issues emerged from the research. These are described below.

5.1 The impact on homeowners in rural areas

A recurring theme was the potential negative impact on homeowners in rural areas if the standard were to become legally-binding. Concerns relating to the higher proportion of older properties in rural areas were raised. These included the challenges and costs of getting older properties to meet the standard, difficulties in accessing tradespeople and the fact that many properties in rural areas are off the gas grid. Respondents reported that homeowners in such properties have to consider different solutions in relation to making their home more energy efficient.

5.2 Concerns about vulnerable groups – older people and those in fuel poverty

There was some concern that the financial impact of making costly energy efficiency improvements to meet the standard would affect older people and people living in fuel poverty more acutely. Some respondents noted that these two groups of people were also more likely to be living in properties which were more difficult to upgrade.

5.3 Challenges facing owners of older homes

Many respondents noted the high number of older homes in Scotland which are below EPC Band C currently, and the high costs that could be involved in making the necessary changes to these properties to achieve this rating.

5.4 Need for adequate finance and information to incentivise people to make changes

Respondents noted the need to raise awareness among the public of the benefits of meeting the standard; the finance available to support energy efficiency improvements to be made; and sources of advice, support and technical help.

5.5 Affordability and financial support

There was concern among many respondents that the energy efficiency improvements required to meet the standard could be prohibitively expensive for homeowners. Respondents were widely in favour of financial support being made available, with mixed views about whether this should take the form of loans, equity release schemes, grants or other forms of support.

5.6 Need for changes to the EPC

Many respondents raised concerns about the effectiveness of the metric used to measure energy efficiency within the EPC. Individuals and representatives of professional bodies were most concerned that it was not an appropriate measure of

energy efficiency in homes. Some called for it to be revised while others felt that another mechanism entirely should be used.

5.7 Need for compliance to be monitored and penalties to be issued for non-compliance

The need for a robust compliance regime was highlighted as essential if the standard were to become legally-binding. There were mixed views about where any compliance body should sit – with some respondents suggesting this should be the role of local authorities and others calling for an independent body to be set up to ensure compliance.

5.8 Ensuring impartial and appropriate assessments and recommendations

There were mixed views about who should assess a property's energy efficiency rating and provide any advice and recommendations for bringing the property up to the required standard. Some respondents agreed that Domestic Energy Assessors should undertake this role, albeit with some upskilling, while others felt that other professionals such as architects and surveyors would be better placed to take on this role.

Another recurring theme among respondents was the need to ensure that whoever undertakes the assessment provides impartial advice and should not stand to gain in any way from the proposed work.

5.9 National standards

Some respondents emphasised the need for national standards or a scheme for accreditation/approval of installers, potentially backed by statutory bodies to ensure that any energy efficiency improvements made to homes are completed to a high standard.

Chapter 1: Introduction and background

1.1 Policy context

This report presents analysis of responses to the Energy Efficient Scotland: Improving Energy Efficiency in Owner-Occupied Homes public consultation. The consultation exercise ran from 19 December 2019 to 9 April 2020. The consultation involved an online questionnaire with nine multiple choice questions and 23 free-text questions.

Improving the energy efficiency of buildings in Scotland is an important aim for the Scottish Government, particularly in contributing to priorities around fuel poverty⁷ (by ensuring that homes are more affordable to heat) and climate change (by helping to reduce emissions of greenhouse gases).⁸ In 2018, the Scottish Government published the Energy Efficient Scotland Route Map, a 20 year programme involving action across the private rented, social rented, owner-occupied and non-domestic sectors aimed at making Scotland's buildings warmer, greener and more energy efficient.⁹ An update to the Route Map will be included in the Scottish Government's draft Heat in Buildings Strategy, which will be published in February 2021.

The owner-occupied sector accounts for 62% of homes in Scotland, but only 38% of these homes are rated Energy Performance Certificate (EPC) Band C or above, meaning that 930,000 homes are below that standard.¹⁰ The Route Map set out proposals that all owner-occupied homes should reach EPC Band C by 2040, including consideration of a mandatory requirement to reach this standard from 2030.¹¹

The Scottish Government conducted a consultation in 2019 to inform further development of the Energy Efficient Scotland programme.¹² The findings of this

⁷ The Fuel Poverty (Targets, Definition and Strategy) (Scotland) Act 2019 (<https://www.gov.scot/policies/home-energy-and-fuel-poverty/fuel-poverty/>) defines a household as being in fuel poverty if, "after housing costs have been deducted, more than 10% (or 20% for extreme fuel poverty) of their net income is required to pay for their reasonable fuel needs; and if, after further adjustments are made to deduct childcare costs and any benefits received for a disability or care need, their remaining income is insufficient to maintain an acceptable standard of living, defined as being at least 90% of the UK Minimum Income Standard".

⁸ Energy Efficient Scotland: Improving Energy Efficiency in Owner-Occupied Homes – Consultation Paper <https://www.gov.scot/publications/energy-efficient-scotland-improving-energy-efficiency-owner-occupied-homes/>

⁹ Energy Efficient Scotland: Route Map <https://www.gov.scot/publications/energy-efficient-scotland-route-map/>

¹⁰ Energy Efficient Scotland: Improving Energy Efficiency In Owner-Occupied Homes – Consultation Paper <https://www.gov.scot/publications/energy-efficient-scotland-improving-energy-efficiency-owner-occupied-homes/>

¹¹ Energy Efficient Scotland: Route Map <https://www.gov.scot/publications/energy-efficient-scotland-route-map/>

¹² Energy Efficient Scotland: Consultation of Further Development of the Programme <https://www.gov.scot/publications/energy-efficient-scotland-consultation/>

consultation, together with the increasing focus on the climate emergency, led to the Scottish Government committing in its Programme for Government 2019-20¹³ to publish proposals to accelerate the timescale for improving energy efficiency standards in owner-occupied housing.

Following this, the Improving Energy Efficiency in Owner-Occupied Homes consultation document set out the Scottish Government’s proposals for the nature of the proposed standard for owner-occupied homes; and for the intention to make this legally-binding from 2024. The consultation invited feedback from the public to help shape plans for improving energy efficiency in owner-occupied housing.

1.2 Responses to the consultation

The consultation took place between 19 December 2019 and 9 April 2020 and received 150 responses via the Citizen Space online portal and email. Two responses were removed as duplicates.

No ‘campaign responses’¹⁴ were identified during the analysis.

Overall, 148 responses were included in the analysis, of which 79 were from individual members of the public and 69 were from organisations.

Table 2 provides details of the 148 respondents included in the analysis broken down by type of respondent and organisation sector.

Table 2: Breakdown of respondents with organisational respondents classified by organisation sector

Category	Number of respondents	Percentage of respondents
Organisations	69	47%
Academics	2	1%
Building component manufacturers or services	4	3%
Community group	3	2%
Energy-related private sector	13	9%
Local authority or interagency partnership	10	7%
Anonymous organisation	1	1%

¹³ Scottish Government, Programme for Government 2019-20
<https://www.gov.scot/publications/protecting-scotlands-future-governments-programme-scotland-2019-20/>

¹⁴ Campaign responses are responses submitted through a co-ordinated campaign, often using standard text provided by the campaign organiser.

Category	Number of respondents	Percentage of respondents
Private landlord or property management	1	1%
Professional or representative body	24	16%
Public sector or body	2	1%
Scottish Government delivery partner	2	1%
Third sector	7	5%
Individuals	79	53%
TOTAL	148	100%

Appendix 2 provides a full list of organisations which responded to the consultation.

The questions included in the consultation were wide-ranging, and findings related to each of them have been outlined in detail in this report. Many of the views expressed were mixed, with numbers of respondents in favour of the proposals often being similar to those against the proposals overall. In general, organisations tended to be more likely to be in favour of proposals than individuals.

1.3 Analysis of responses

The consultation involved a questionnaire with 32 questions, of which 23 were free-text and nine had both a multiple choice and free-text component.

The remainder of this report presents a question-by-question analysis of the responses to the consultation.

All Citizen Space and email responses were collated into one master Microsoft Excel spreadsheet, and the responses to the multiple-choice questions were quantitatively analysed using Excel to identify the number and percentage of respondents selecting each option. Cross-tabulations were produced to break down responses by respondent category (e.g. by individuals and organisations and by organisation sector) and to identify any differences in opinion between different groups. A breakdown of responses by respondent type and organisation sector is presented in Appendix 1.

To analyse responses to the free-text, qualitative questions, the Excel spreadsheet was imported into NVivo. Where email responses were not structured according to the questions laid out in the consultation document, relevant responses were categorised under relevant questions.

Responses to the purely open questions and the free-text elements of the closed questions were analysed and assessed for any patterns by respondent category, for example between individuals and organisations, or among different organisational sectors. Responses were manually coded and cross-referenced with

auto-coding. The coded responses were explored and analysed by running queries by question, theme, respondent type and so on to form a clear understanding of the evidence.

As with any public consultation exercise, it should be noted that respondents usually have a particular interest in the subject area. The self-selecting nature of the respondents therefore means that the views expressed throughout this report cannot necessarily be seen as representative of wider public opinion.

Throughout the analysis, terms have been used to indicate the prevalence of certain viewpoints or suggestions. The following provides definitions of the approximate proportions referred to when these terms are used:

All - 100%	Many – more than half	A minority - less than one-fifth
The majority – over four-fifths	Some – one fifth to a half	A few – up to five

Please note that the number of responses represented by some of these terms will vary based on the number of respondents commenting on a question.

Chapter 2: Findings

This chapter provides an overview of the findings from the consultation. Each question is addressed in turn with quantitative and qualitative findings provided as applicable.

Further details of the quantitative findings are provided in Appendix 1.

2.1 Responses to Question 1: Do you agree or disagree that there should be a legally-binding energy efficiency standard for owner-occupied housing?

Responses to Question 1 are set out in Table 3.

Table 3: Responses to Question 1

Response	No of respondents	% of respondents who answered this question (136)
Agree	75	55%
Disagree	61	45%
Not Answered	12	n/a
Total number of free-text responses	133	n/a

136 respondents provided a response to this question. Responses were mixed with 55% of those who answered the question agreeing that there should be a legally-binding energy efficiency standard for owner-occupied housing, and 45% disagreeing. Organisations (78% that answered the question) were more likely than individuals (38%) to agree with this proposal.

Some respondents felt that the target date of 2024 was too soon, whereas others felt that more push was required to encourage change sooner.

Some described a move to a legally-binding standard as out of proportion with current levels of control over private buildings and property. One respondent stated, for example, that:

“It is not a legal requirement to ensure your property is maintained and in good condition (a premise before making energy improvements) and statutory action can only be taken where there is a risk to public safety” (Individual).

Some of those in favour of a legally-binding standard felt that there was no other course of action left and that the voluntary/persuading route had failed. They described a voluntary system as inadequate, with some describing homeowners as slow to make decisions and change behaviours in relation to energy use, and as

perceiving the cost of energy efficiency improvements to be too high compared to annual fuel bill savings.

Some respondents sat somewhere in between these two positions – suggesting an approach that initially encourages and supports homeowners, and legally mandates change later. Some respondents also referred to the need to ensure consumer buy-in to the plans and changes rather than force them into making early and poor decisions.

A range of other issues were raised in relation to Question 1 – these related to the challenges of making improvements to older buildings, the impact in rural areas, the need for a robust compliance regime, weaknesses with the EPC certification process, the financial impact on owners, the need to incentivise change, the impact on the housing market, and the need for improved information sharing about the standard.

These issues were raised by respondents in relation to a number of other questions included in the consultation and are dealt with in a cross-cutting themes chapter later in the report.

2.2 Responses to Question 2: Do you agree or disagree that EPC Energy Efficiency Rating Band C is the appropriate standard to use?

Responses to Question 2 are set out in Table 4.

Table 4: Responses to Question 2

Response	No of respondents	% of respondents who answered this question (138)
Agree	64	46%
Disagree	74	54%
Not Answered	10	n/a
Total number of free-text responses	131	n/a

138 respondents provided a response to this question. Views on whether EPC Band C is the appropriate standard to use were again mixed, with 54% of those who answered the question disagreeing, and 46% agreeing. Organisations (66% of those that answered the question) were more likely than individuals (31%) to agree with this suggestion.

2.2.1 Those in agreement that EPC Band C is the appropriate standard to use

Of those who were supportive of EPC Band C being the appropriate standard, a few thought that the EPC Band C lacked ambition but represented a level at which

it may be possible to get owners to comply. A few respondents also felt this level was appropriate since social housing has to attain EPC Band B by 2032 under the Energy Efficient Scotland programme.

Some respondents noted the value of EPCs being widely recognised among members of the public.

2.2.2 Those who disagreed that EPC Band C is the appropriate standard to use

Many respondents, including those who worked for organisations involved in some professional capacity with the EPC certification process currently, were of the view that either EPC Band C needed reformed, or that it was not appropriate. For example, one experienced energy assessor who had been extensively involved in producing EPCs felt that EPC Band C was unrealistic for domestic properties in Scotland.

Some respondents referred to the EPC certification process being flawed or limited in what it is able to measure, highlighting that it does not take into account issues such as how to improve listed buildings or the move away from gas central heating and the potential for electric systems. Other suggestions for improvements included recommendations that the standard be less reliant on default values and involve on-site measurements and observations alongside locally available data; and aiming for a standard that is net-zero compliant and accounts for a diverse range of homes.

“EPCs make comparisons between houses by normalising multiple variables, but are not designed to consider the complex and ever-changing variables of householders. In order to use EPCs as is being proposed means wilfully ignoring this fundamental limitation” (Academic).

“EPC is a blunt tool not suitable for all circumstances. I have designed zero-heating houses which only achieve a C rating, despite consuming very little energy” (Individual).

A few respondents felt that requiring homeowners to achieve EPC Band C within a short timeframe could have considerable local impact, both on homeowners' ability to afford energy efficiency improvements and on the local supply chain.

A few respondents had concerns that using EPC Band C in the short term could compromise longer term aims. One respondent, for example, noted that in aiming for EPC Band C there was a risk that actions taken could prohibit homeowners meeting any subsequent revised target that hits net-zero.

Some respondents argued that action should be staggered, with one suggesting that action be targeted at those properties already rated at EPC Band D first as they would require the least amount of intervention to bring them up to EPC Band C or above. Another respondent suggested that homeowners could be required to improve their home's rating by at least one EPC Band, rather than setting a mandatory Band.

A few respondents felt that private homes should not be required to meet as high standards as properties which are commercially let.

“It seems unfair and not rational that private rented properties are required to meet Band D by 2025 yet the proposal for private homes is Band C from 2024 with no lead in? Arguably private homes should be less onerously measured than those which are put up for commercial letting” (Individual).

A few felt that it was not ambitious enough and that homeowners should be made to attain EPC Band B.

A number of other cross-cutting themes were raised in relation to this question. These are outlined in Chapter 3

2.3 Responses to Question 3: What are your views on the ‘fabric first’ approach?

134 respondents provided a response to this question. Responses were all free-text.

Respondents expressed a range of views relating to the fabric first approach, which included comments around financial impact, older properties, rural areas and the mandatory aspect of this approach which are outlined below.

Most respondents agreed that taking a fabric first approach to improving the energy efficiency of a property, by ensuring that a property is well insulated, would make it easier and more economical to heat a home, reducing energy bills and heat loss. Respondents noted this was an easily understood first step that would bring tangible benefits to homeowners, ultimately making their homes warmer and more affordable to heat.

Some other respondents agreed that some improvements to the home, such as insulation and draught proofing, were low-cost and therefore feasible. However, these respondents also noted that other improvements, such as installing double glazing and roof insulation, would be too expensive for many homeowners and would require financial help from the government.

Another view among some respondents was that, although they supported and understood the drive to improve a building’s fabric, they felt that there were risks associated with an exclusive focus on fabric first. They warned that this could lead to sub-optimal solutions being installed on many properties, for example listed buildings, homes in conservation areas, timber-framed homes and system-built properties.

There was also concern among some respondents that older properties would have little scope for improving the fabric beyond loft insulation and double glazing. Some of these respondents highlighted that implementing energy efficiency improvements to prevent draughts in older properties can result in complications, such as increased condensation, which could lead to longer-term problems.

A minority suggested that the financial cost to owners of older and listed buildings would be substantial and government grants would be required. Likewise, concerns were raised about the high costs of property maintenance and energy efficiency improvements in properties in rural areas in particular. Some respondents were concerned that an exclusive focus on fabric first could result in sub-optimal solutions for many properties in rural areas, arguing that these solutions were likely to vary significantly depending on the suitability and availability of low carbon energy sources within the local area.

Other respondents felt that if a fabric first approach was legally-binding it would encourage homeowners to focus on improvements which positively impacted on their EPC Band rather than on improvements which were best suited to their property and environment.

A minority of respondents argued that a fabric first approach would be more challenging in tenement properties, where achieving agreement to improve common parts and arranging how the work is paid for can be problematic.

A few respondents suggested that heat and energy efficiency were considered together - an approach which would minimise disruption and reduce the costs of installing low carbon heating in the future.

2.4 Responses to Question 4: In your view, how can we ensure that when EPCs are used to determine compliance with the standards, they are robust and not easily open to misuse?

133 respondents provided a response to this question. Responses were all free-text.

Respondents provided a range of suggestions to ensure that EPCs are robust and not open to misuse when used to determine compliance with the standards.

2.4.1 EPC Assessors

Many respondents focussed on the importance of the role of the assessor in the process. A few stressed that the requirements for becoming an EPC assessor need to be more stringent. They listed the types of qualities that EPC assessors should possess, emphasising that it was important for assessors to be:

- Appropriately qualified
- Experienced
- Knowledgeable about the construction process
- A member of a professional body, such as RICS or accredited by a recognised scheme, such as Scottish Quality Mark

Others felt that integrity was a key quality for assessors to possess.

One respondent suggested that the Scottish Government could learn from Portugal's EPC system:

"In Portugal, for example, Energy Performance Certificates are issued by 'qualified experts' who are either recognised architects or engineers with at least five years professional experience. To obtain the accreditation necessary to issue EPCs the expert must take an exam offered by ADENE, the Portuguese Energy Agency" (Scottish Government delivery partner).

A few respondents argued that EPC assessors should be completely independent from the local authority and not linked to any energy efficiency scheme provider, ensuring that assessors would have no financial benefit (other than the fee for the certification process) from the rating given.

2.4.2 Appropriate levels of training for EPC assessors

Some respondents emphasised the importance of ensuring that every EPC assessor completes a robust and thorough programme of training and certification before becoming an assessor. A few expressed concern that the current training required to become an assessor is not robust enough, which leaves EPCs ratings open to misuse and error.

A few respondents also suggested that, once qualified, assessors should undertake regular upskilling and training to protect homeowners from poor quality assessments.

2.4.3 Auditing

Some respondents suggested that accredited bodies should implement random, comprehensive spot checks on assessors and submitted documentation.

"We suggest that a Domestic Energy Assessor (DEA) should be accredited by a recognised scheme and that the Scottish Quality Mark should carry out regular and random audits of EPCs produced by certified assessors" (Scottish Government delivery partner).

One respondent stressed that desk-based audits should be complemented by physical inspections and verifications.

A few added that those who are found to have deliberately manipulated results or made other errors in the assessment should be held to account, either through a financial penalty or removal from duty. Other suggestions for ensuring robustness of EPCs included:

- increasing the transparency of the process, for example including the name of the assessor in the EPC to increase accountability
- providing digital evidence of compliance, for example geo-tagged pictures
- recording EPC Bands on building passports

- use of trusted trader schemes

2.5 Responses to Question 5: Do you think the standard should be fixed, or should it be subject to periodic review and change over time?

136 respondents provided a response to this question. Responses were all free-text.

The consensus among many of these respondents was that the standard should be subject to periodic review and change over time, although some felt that it should be fixed.

2.5.1 Respondents in favour of the standard being fixed

Respondents who felt that the standard should be fixed argued that this would allow homeowners to plan energy efficiency improvements, and how they would finance them, over time. These respondents also noted that changing the standard could force homeowners to make further energy efficiency improvements after changes had already been made to comply with the previous standard, putting further financial pressure on homeowners.

“Periodically reviewing the standard is attractive in policy terms but means you are effectively moving the goalposts for consumers. A danger with this approach is that it may have the unintended consequence of increasing costs for households” (Professional or representative body).

2.5.2 Respondents in favour of the standard being subject to periodic review

The most common argument for the standard being subject to periodic review was to take account of technological advances which could enable a higher standard to be achieved. For example, innovations could reduce the cost of energy efficiency improvements and make these affordable for more homeowners, and/or technological changes could make certain forms of energy more environmentally friendly over time.

“We believe the standard should be subject to review over time. This is because new technologies will be developed in the future that may lower costs and this means that higher EPC Bands could become more cost effective and technically feasible to implement” (Scottish Government delivery partner).

A minority also felt that the standard needs to be reviewed and updated in response to any changes in climate change targets. These respondents noted that, if the Scottish Government made climate change targets more ambitious, then the standard might need to change to enable reductions in emissions to be achieved more quickly.

2.6 Responses to Question 6: Do you agree or disagree that 2024 is the right start date for the mandatory standard to start operating?

Responses to Question 6 are set out in Table 5.

Table 5: Responses to Question 6

Response	No of respondents	% of respondents who answered this question (127)
Agree	48	38%
Disagree	79	62%
Not Answered	21	n/a
Total number of free-text responses	132	n/a

127 respondents provided a response to this question. The majority of respondents (62% of those who answered the question) disagreed that 2024 is the right start date for the mandatory standard to start operating, with 38% of respondents indicating that it was the right start date.

Of those agreeing with the proposed start date, positive responses were higher among organisations (60%) than individuals (23%). Those who agreed with the proposed start date described it as a reasonable timeframe which gives homeowners sufficient time to prepare, whilst recognising the urgent need for improvements in the energy efficiency of homes in Scotland.

Those who disagreed with the proposed start date did so for two main reasons; either they felt 2024 was too soon, or that 2024 was not soon enough.

Arguments for and against the proposed date are explored further below.

2.6.1 Support for 2024 start date

Some respondents supported the proposed start date of 2024, describing it as “reasonable” and “appropriate”. They felt that this would give sufficient lead-in time for homeowners, regulatory bodies and the wider industry to prepare.

“This would give enough time for households and industry to become aware of the changes and ensure they are prepared for upgrading their homes”
(Energy-related private sector).

A few respondents noted that the 2024 start date would allow sufficient time for the Scottish Government to share information about the mandatory standard and what will be expected of homeowners. A few stressed that the information-sharing stage would be critical in ensuring shared understanding and stimulating action, and added that an appropriate level of help, advice and support would need to be made

available in order for the standards to be implemented successfully within this timeframe.

A minority of respondents commented that they believed the technology required to deliver low-carbon heating is ready, and that construction and energy businesses could expand to meet the growth in demand if this start date were to go ahead.

2.6.2 Concern that 2024 start date is too late

A few respondents argued that the proposed start date of 2024 is not soon enough given the seriousness of the climate emergency, and the mandatory standard needs to be introduced as soon as possible. A few suggested a start date of 2023 would be more appropriate.

“Bringing the start date forward by one year to 2023 could be an option; it would help to ensure that homes are being brought up to the standard needed for net-zero by 2045” (Energy-related private sector).

2.6.3 Concern that 2024 start date is too early

Many respondents indicated that 2024 is too early a start date to introduce the mandatory standards, describing it as “too ambitious” and a “challenging” target. A number of reasons were given.

Some respondents argued that a period of less than five years is not enough time for homeowners to prepare for the implementation of the mandatory standards, given how substantial the changes are. They indicated that homeowners would require sufficient lead-in time to prepare for the regulations, prioritise investments and home improvements, save money to fund the required energy efficiency improvements, and consider if, and how, the standards would impact on their decision to buy or sell a property. A few respondents felt that the impact of the COVID-19 pandemic on homeowners, the economy and the Scottish housing market would pose a particular challenge.

Some respondents suggested that the construction industry does not currently have the capacity and skillset to deliver the programme of works at the scale required. They felt that a start date of 2024 would not give the industry enough time to prepare and could overwhelm the supply chain. Others suggested that the construction industry would require significant investment to be able to facilitate the necessary improvements and training needed.

A few respondents suggested that a phased approach could be taken to ensure that the market has the skills and capacity to deliver.

A few respondents were concerned about the lack of affordable, low carbon heating solutions currently available.

2.7 Responses to Question 7: Do you agree or disagree with point of sale as an appropriate trigger point for a property to meet the legally-binding standard?

Responses to Question 7 are set out in Table 6.

Table 6: Responses to Question 7

Response	No of respondents	% of respondents who answered this question (129)
Agree	73	57%
Disagree	56	43%
Not Answered	19	n/a
Total number of free-text responses	129	n/a

129 respondents provided a response to this question. Just over half of respondents who answered the question (57%) agreed with the suggestion that the point of sale was an appropriate trigger point for a property to meet the legally-binding standard. Organisations (84%) were more likely than individuals (38%) to support this proposal.

2.7.1 Arguments in favour of point of sale as an appropriate trigger point

While many respondents who agreed with the proposal did not explain why they supported it, the most common argument in favour was that point of sale is a time when sellers and buyers often make other changes to their homes, so they might be more receptive to making energy efficiency improvements alongside other energy efficiency improvements they would be making anyway.

“The point of sale is a strong trigger point where there are likely to be decorative and/or structural changes to the property anyway so upgrading the energy performance would not incur any additional hassle or time” (Energy-related private sector).

In addition, some respondents noted that homes are subject to an EPC assessment as part of the home report before they are sold, so this trigger point could save repeating the assessment at another point.

2.7.2 Arguments against point of sale as an appropriate trigger point

Some respondents expressed concern that this proposal could have an adverse effect on the housing market. They argued that the cost of bringing a home up to standard could put sellers off selling, either if they decided to fund the improvements themselves before selling the property, or if the requirement had a negative impact on the value of their property. Likewise, respondents suggested

that buyers might be put off buying a property if they were required to spend money to bring it up to standard shortly after they bought it. These respondents were concerned that this could lead to a slow down in the housing market.

A few respondents were concerned that making the standard a condition of sale could have a negative impact on vulnerable groups such as the elderly and low income groups, who may be less likely to be able to afford the required improvements.

Another argument that a minority of respondents made against point of sale as a trigger point was that some properties may not be sold for many years, so it would take a long time for these to be brought up to standard. A few of these respondents suggested that an alternative trigger point, which would apply to more properties, sooner, should be identified.

A minority of respondents felt that it would be unfair to use point of sale as a trigger point because selling a home is already a stressful experience - particularly if it is happening because someone has died, a couple has separated, or to fund the owner's move into nursing care – and this could add to the stress involved.

2.8 Responses to Question 8: Do you agree or disagree that responsibility for meeting the standard should pass to the buyer if the standard is not already met at point of sale, as described above?

Responses to Question 8 are set out in Table 7.

Table 7: Responses to Question 8

Response	No of respondents	% of respondents who answered this question (121)
Agree	78	64%
Disagree	43	36%
Not Answered	27	n/a
Total number of free-text responses	122	n/a

121 respondents provided a response to this question. The majority of respondents (64%) agreed that responsibility for meeting the standard should pass to the buyer if the standard is not already met at point of sale. Organisations responding to the question (81%) were more likely than individuals (54%) to agree.

2.8.1 Arguments in favour of responsibility passing to the buyer

Some respondents felt that responsibility should pass to the buyer because they are likely to be more motivated than sellers to make energy efficiency

improvements. Respondents explained that, as the buyer would be living in the property, they would typically have more interest in the best outcome, and may even go beyond the minimum requirement. Another point raised by a few respondents was that buyers might be more able than sellers to access the funds required for the improvements, because they would potentially have access to additional finance through a mortgage or other source.

“It is more likely that the buyer will be in a position to invest in house improvement, both financially and psychologically from a motivational point of view” (Local authority or interagency partnership).

“The purchaser is far more likely than the seller to want to have the appropriate works carried out to the property to a good standard, rather than looking for the cheapest solutions to get the property to Band C” (Professional or representative body).

A minority of respondents emphasised that, if responsibility passes to the buyer, the cost of the improvements should be reflected in the selling price.

There was also a feeling among a minority of respondents that passing responsibility to the buyer would help to avoid any delays in the sales process. Their view was that a sale could be delayed if a seller had to make the improvements before the sale could proceed.

2.8.2 Arguments against responsibility passing to the buyer

Some respondents noted concerns that the cost of making energy efficiency improvements could decrease the number of people looking to purchase properties, and this could lead to a slow-down in the property market.

Some respondents felt that the cost of reaching the standard in older properties in particular would be too great and raised concerns that these less efficient properties (including rural and older buildings) would become increasingly difficult to sell. Some, however, felt that this could be overcome by a price reduction.

2.8.3 Other issues

A few respondents argued that inherited properties should be excluded from the standard, as those who inherit a family home would have additional costs on top of any energy efficiency improvements which may not be affordable. This could lead to an increase in the number of empty homes, especially in rural areas.

With regards to timeframes, respondents indicated that if responsibility for meeting the standard rests with buyers it is important that they are given adequate time after purchase to undertake the improvements required. A minority of respondents made comments about the proposed 12 month timescale for buyers to make the improvements. The consensus among these respondents was that 12 months is not long enough, while a few felt that the improvements should be made within that timescale in order to realise energy efficiency improvements quickly.

Another point raised by a few respondents was the importance of establishing a system to check that buyers have undertaken the necessary improvements, and to impose penalties on those who do not. A few respondents emphasised that the responsibility for making the improvements should be established in the missives at the point of sale.

“A time based financial penalty would be the only way to force owners’ hands to upgrade” (Local authority or interagency partnership).

2.9 Responses to Question 9: What, if any, unintended consequences do you think could happen as a result of these proposals? For example, any positive or negative effects on the house sales market

135 provided a response to this question. Responses were all free-text.

Respondents acknowledged that these proposals could have both positive and negative unintended consequences, including impacts on the energy efficiency of owner-occupied homes, the housing market, homeowners’ financial situation, and installers of energy efficiency improvements.

2.9.1 Impact on the energy efficiency of owner-occupied homes

Although not an unintended consequence, the main positive impact identified by some respondents is that homes will be more energy efficient as a result of the proposals.

A minority also noted that this could lead to energy efficiency having a greater impact on properties’ values, and this in turn could result in energy efficient properties being more highly valued and desirable. A few noted that this could make homeowners more likely to make energy efficiency improvements in order to enhance the value of their home.

“There is the potential for significant improvements to be made in relation to the energy efficiency of properties and the contribution to tackling emissions” (Local authority or interagency partnership).

2.9.2 Impact on housing market

Many respondents suggested that the proposals could make potential sellers more likely to remain in their homes to avoid the costs involved in bringing their property up to standard.

Some respondents observed that the housing market relies on homeowners upsizing and downsizing to ensure that there are properties available for individuals and families when their circumstances change, and that placing additional requirements on sellers or buyers could result in fewer properties being put on the market, creating bottlenecks. A minority of respondents were of the view that first-

time buyers in particular, may be less inclined to enter the housing market if there is an additional cost to consider, which could again slow the market down.

Some respondents also felt that the proposals could make older homeowners less willing to sell their properties because of the cost of the energy efficiency improvements required, which could reduce the value of their home or place a financial burden on them if they implemented the improvements before selling.

“[There is] a general reluctance [among older people] to move home for a variety of reasons, even when individuals have acknowledged that their home may not be suitable for them into their later life. Adding the barrier of potentially costly energy efficiency measures before they can move is highly likely to make people a lot more reluctant to consider moving” (Third sector organisation).

A minority of respondents also raised concerns that buyers may try to offer less for a property to enable them to meet the subsequent costs of complying with the standard, despite benefiting in the longer term from such upgrades.

Some respondents also raised concerns that these proposals could reduce demand for older and listed properties, which could be more expensive to bring up to standard than newer properties, and a few predicted that this could lead to an increase in the number of empty properties.

A few respondents also suggested that some energy efficiency improvements, such as external wall insulation may negatively impact on a property’s appearance which could decrease the value of the property.

“The most significant unintended consequence will be the possibility that historic and traditional buildings could be significantly damaged by ill thought out retro fitting to make buildings comply which were never intended or able to do so” (Professional or representative body).

2.9.3 Impact on homeowners’ financial situation

A minority of respondents suggested that for those living in fuel poverty or at the lower end of the property market, there are often more pressing financial issues than the energy performance of the home. In these cases, the cost of making the necessary improvements could have a significant effect on a household’s financial situation, with a few respondents suggesting that some people could have difficulty accessing credit from mainstream sources to fund this work.

“Desperation to obtain loans to cover these horrendously expensive ‘improvements’ could push people into the hands of unscrupulous money lenders” (Individual).

A minority of respondents suggested that owners with limited capital may also have to prioritise investment in energy efficiency improvements rather than repairing other elements of their property. Some respondents emphasised that financial support, in the form of affordable finance or grants, would be crucial.

2.9.4 Impact on installers of energy efficiency improvements

A minority of respondents observed that the proposals could result in increased demand for skilled installers. Some of these described this as a negative consequence, with concerns over the length of time homeowners would have to wait for work to be carried out, but others felt this was positive, with opportunities for job creation and upskilling in the industry.

“Increases in the number of skilled installers will be required and the skills and training agenda should be a priority for both the Scottish and UK governments”
(Energy-related private sector).

2.10 Responses to Question 10: Do you agree or disagree with point of major renovation as an appropriate trigger point for a property to meet the legally-binding standard?

Responses to Question 10 are set out in Table 8.

Table 8: Responses to Question 10

Response	No of respondents	% of respondents who answered this question (127)
Agree	91	72%
Disagree	36	28%
Not Answered	21	n/a
Total number of free-text responses	124	n/a

127 respondents provided a response to this question. The majority of respondents (72%) agreed with the point of major renovation being an appropriate trigger point for a property to meet the legally-binding standard. Among respondents who answered this question, organisations (90%) were more likely than individuals to agree with this (59%).

2.10.1 Responses from those in agreement

Some respondents agreed that the rate of turnover on properties is not enough for the point of sale to be the sole trigger point and a major renovation was a “logical and additional” trigger. There was a view among many respondents that major renovations such as extensions could provide a trigger point for homeowners to consider the efficiency of their home as cost-efficiencies may be found and levels of disruption would already be expected at this point in time.

“Extending the size of a home often requires new heat emitters and/ or heating system. This presents an opportunity to ensure that the system is

appropriately sized and operating efficiently” (Professional or representative body).

A minority of respondents also thought that having an understanding of what will be required to upgrade a home ahead of a sale in the coming years may encourage households to act earlier and undertake works during other renovations.

Some respondents emphasised the need for the EPC to be updated each time refurbishment work was undertaken which would affect a property’s energy performance.

“We would like to see property passports introduced alongside dynamic EPCs, which could be mandated at the point of major renovation to help households think about what their home needs in order to meet the Band C target. It should be a requirement that the EPC/Home Passport be updated whenever renovations affecting the energy performance are undertaken – new / replacement heating systems or controls, new windows or doors, any changes in the ventilation system, changes to the building fabric affecting the thermal performance” (Building component manufacturers or services).

Many respondents suggested that installers and/or builders carrying out renovations should be encouraged to explain low-carbon options to consumers and highlight the importance of reaching EPC Band C.

Some respondents noted the importance of having clarity around the definition of a major renovation.

2.10.2 Responses from those in disagreement

The main argument that respondents made against this proposal related to affordability. A few respondents noted that making energy efficiency improvements at the same time as a renovation could dissuade homeowners from making renovations.

“Unless the owner is very well off, people would not do renovations for fear of getting into a financial minefield” (Individual).

A few others were of the view that it was an individual’s choice if they wished to undertake additional energy efficiency improvements as part of the renovation and that this should not be mandated.

Other points raised by a few respondents include: a feeling that the standard should apply to a wider range of properties than only those that are being sold or undergoing renovation; and that this system could be difficult to enforce, with potential loopholes including homeowners making a number of smaller renovations over time to circumvent the definition of ‘major renovation’.

2.11 Responses to Question 11: What is your view on how ‘major renovation’ should be defined? Should the Energy Performance of Buildings Directive definition, as described in Annex B, be used?

113 respondents provided a response to this question. Responses were all free-text.

More than half of respondents broadly agreed with the Energy Performance of Buildings Directive (EPBD) definition of ‘major renovation’ as set out below:

‘Major renovation’ means the renovation of a building where:

(a) the total cost of the renovation relating to the building envelope or the technical building systems is higher than 25% of the value of the building, excluding the value of the land upon which the building is situated; or

(b) more than 25% of the surface of the building envelope undergoes renovation

Those who supported the definition described it as sensible, reasonable and appropriate. A few noted that it would be sensible to adopt an existing and industry-recognised definition as this would promote better understanding within the industry.

There was confusion among a minority of respondents over the phrase "the surface of the building envelope" in part B of the EPBD definition. They felt the phrase could lead to different interpretations of what should be included in this measurement, e.g. if it simply relates to floor area or whether roof and wall surface area are included.

A minority expressed disagreement with using a property’s market valuation in the definition of ‘major renovation’. Concerns included:

- the risk that less expensive homes will be disproportionately affected given that their cost threshold will be lower than more expensive homes
- given that location is a major factor in building value, the number of eligible properties will vary depending on their location
- market valuations can be subjective and vary depending on the assessor carrying out the valuation
- there could be difficulties in calculating the value of a property ‘excluding the value of the land upon which the building is situated’
- this will require owners to gain a valuation at an additional cost

There were concerns raised by a few respondents that the EPBD definition of ‘major renovation’ allows for work-arounds, for example homeowners could break down renovations into smaller jobs and circumvent the proposed consequential improvement requirement.

A few felt that the EPBD definition of 'major renovations' was too lenient. They felt that the threshold of 25% was too high and would be a barrier to important energy efficiency improvements being installed. 10% was suggested as a new threshold by a few respondents.

2.12 Responses to Question 12: How could a requirement to meet the energy efficiency standard at point of major renovation be checked and enforced? Who should be responsible for this?

118 respondents provided a response to this question. Responses were all free-text.

Respondents gave a range of suggestions for how meeting the standard could be checked and enforced.

Some respondents felt that local authority building standards or building control departments should be responsible for checking and enforcing a requirement to meet the energy efficiency standard at point of major renovation. Many reasoned that, because building standards officers are responsible for granting building regulations approval and monitoring compliance, it would be logical for them to assume this responsibility.

A minority of respondents noted that a requirement to meet the energy efficiency standard at point of major renovation could be checked as part of the building warrant application process.

A few suggested that compliance with the requirement could be ensured by withholding a completion certificate until a post-works check is completed by the local authority building standards or building control department.

However, some respondents were concerned that local authorities may lack the appropriate resources, knowledge or powers to check and enforce the standard and it would therefore be challenging for them to assume this responsibility. A few noted that additional funding would be required if local authorities were to take this on.

A few respondents felt that the responsibility should lie with an approved independent third party or independent government agency. One respondent suggested this responsibility should lie with Home Energy Scotland.

2.13 Responses to Question 13: What do you think would be a fair and appropriate method to ensure compliance, if the legally-binding standard is not met? What type of penalty system would be appropriate?

126 respondents provided a response to this question. Responses were all free-text.

Many respondents indicated that there should be no penalty for non-compliance. They argued that, in situations where homeowners are struggling to find adequate resources to fund the energy efficiency improvements, a penalty system based on fines would only add to the financial burden they face and therefore is likely to be counter-productive.

“Given that one of the biggest reasons for not complying with the new standards is affordability, careful consideration should be given to introducing immediate or significant financial penalties” (Local authority or interagency partnership).

Some respondents felt that heavy fines would disproportionately affect those already in fuel poverty and push homeowners into financial difficulty.

Those who rejected the idea of a penalty system proposed alternative approaches to ensuring compliance. Some endorsed an incentive-based approach instead of a penalty system, arguing that it may be more effective to incentivise owners to implement energy efficiency improvements prior to issuing a penalty. Incentives suggested included fiscal reductions for compliant properties, such as a reduction in Council Tax, subsidies and zero-interest loans.

Other respondents believed that non-compliance would result in indirect disadvantages and therefore official penalties should not be applied. A few suggested that property owners would be effectively penalised on the sale price of their home, as a poor EPC Band would devalue the property. A few noted that owners who do not comply would be penalised through greater fuel costs in the running of the home.

A few respondents suggested that non-compliant properties should be banned from being sold or rented until compliance is achieved.

Of those respondents who expressed support for introducing a penalty-based system, most felt that this should be integrated into the existing Council Tax model. Respondents noted that the Council Tax model is already well-established and understood by homeowners, and could allow for a sliding scale of penalties, with those with more expensive properties charged more for failure to comply than those with less expensive properties.

2.14 Responses to Question 14: Should a penalty for failing to comply with the standard be one-off or recurring?

122 respondents provided a response to this question. Responses were all free-text.

There was no clear consensus among the responses with regards to whether any potential penalties should be one-off or recurring. Some supported a one-off penalty, noting that one-off fines would be easier to administer and that some properties will never be able to meet the standard and should therefore not be penalised on a recurring basis.

However, some respondents argued that a one-off fine could mean that homeowners may simply pay the fine rather than undertaking the improvement works, and that recurring penalties would have greater impact in ensuring compliance.

Most of the respondents in support of a penalty agreed that penalties should be applied on a recurring basis. Some suggested that a recurring annual or bi-annual fine should be applied until all necessary action is taken by the homeowner to improve the home or a valid exemption is granted. A few suggested that the fines should gradually increase over time.

2.15 Responses to Question 15: At what level, approximately, should any penalty be set?

115 respondents provided a response to this question. Responses were all free-text.

Those respondents who suggested an approximate level for a penalty agreed that the level should be set at a rate which incentivises the majority of households to meet the standard. A few stressed that, ultimately, it is important that the costs associated with non-compliance are greater than the costs associated with compliance.

Respondents provided a wide range of proposals for the type and level of the penalty that should be applied, a summary of which are included in Table 9.

Table 9: Suggestions for type and level of penalty

Type of penalty	Suggestions for level of penalty
Related to the cost of the work required to meet the standards	<ul style="list-style-type: none"> • Double the estimated cost of meeting the standard • 100% of the estimated cost of meeting the standard • Half the cost of the cost of getting to EPC Band C • 10% total cost of outstanding works (including management) to bring building to standard required
Related to Council Tax	<ul style="list-style-type: none"> • 50% of the average Scotland Council Tax Band D fee (which works out as £750) • 15% increase over the property's Council Tax Band • Double the homeowner's Council Tax fee
Percentage of value of the property	<ul style="list-style-type: none"> • 10% of the overall value of the property • 1.5% of the sale value of the property
Fixed penalty	<ul style="list-style-type: none"> • £50 one-off fine • £1000 annually • £5000 one-off fine

2.16 Responses to Question 16: Are there any particular groups of people who could be adversely affected, more than others, by enforcement processes and charges?

125 respondents provided a response to this question. Responses were all free-text.

Respondents identified numerous different groups of people who could be adversely affected by enforcement processes and charges. These included people on low incomes; older people; and homeowners in rural areas.

2.16.1 People with low levels of income or disposable income

Many respondents felt that the enforcement processes and charges would adversely affect low-income earners, specifically those in fuel poverty and people with no savings. It was noted that these households may find financing the upgrades difficult and would be disproportionately affected by any penalties or charges.

Many respondents also raised concerns about the impact of enforcement on people who were considered to be 'asset rich, cash poor' which could include those who own their homes outright but have limited disposable income to afford maintenance or improvements, e.g. pensioners.

2.16.2 Older people

Some respondents felt that older people who may have lower disposable income or mobility issues could also be adversely affected by the enforcement processes.

Concerns were raised that older people may not have the available funds either to make improvements or pay heavy penalties and that they may find the disruption caused by upgrade work distressing. A few respondents also felt that they may lack the incentive to complete the works, as they might not expect to live long enough to get any benefit from the new energy efficiency improvements.

2.16.3 Homeowners in rural areas

A few respondents felt that, given the extra challenges that homeowners in rural areas face in reaching EPC Band C, such as off-grid gas access and the cost of transporting materials, they would be adversely affected by the enforcement processes and charges.

Other groups of people who respondents felt could be adversely affected included:

- first-time buyers
- homeowners who live in older properties
- disabled people and people with dementia

2.17 Responses to Question 17: Which body or bodies should check if the standard has been complied with at the trigger point, and should be responsible for levying any penalty?

115 respondents provided a response to this question. Responses were all free-text.

Of these, the majority of respondents felt that local authorities would be best placed to monitor compliance and levy penalties due to their existing involvement in building regulation and control.

However, a few noted that additional resources would be required to support local authorities to take on this responsibility, due to the potential scale of monitoring and regulation involved in the new standards.

Some felt that the responsibility for levying penalties should lie with an independent surveyor or independent government agency as this would ensure a greater level of consistency on how the regulations are enforced.

Other organisations that respondents suggested could be involved with levying penalties included:

- The Scottish Government
- Registers of Scotland
- Home Energy Scotland

2.18 Responses to Question 18: Considering the information set out in the consultation document, specifically Part One and in Annex D, what are your views on the best way to approach cost effectiveness, taking into account the trade-offs between how easy to understand and how sophisticated different definitions are, and how the different definitions might affect the number of homes that actually achieve the EPC C standard?

108 respondents provided a response to this question. Responses were all free-text.

Respondents provided feedback on each of the three approaches to defining cost-effectiveness outlined in Annex D - a cost cap, the simple payback test and net present value (NPV).

2.18.1 Cost cap

Many respondents agreed that a cost cap is the simplest system to understand and implement. However, some raised concerns that the cost cap approach is too simplistic, and that setting a cost cap too low would prevent expensive but

important energy efficiency improvements, such as low-carbon heating and external wall insulation, from being installed due to the high costs of implementation.

“A cost cap may not be conducive and should be discouraged to allow more expensive, yet still cost-effective, and highly beneficial to carbon savings solutions to be installed” (Energy-related private sector organisation).

A few noted that this limitation would mean that using the cost-cap approach would result in fewer homes reaching EPC Band C.

2.18.2 Simple payback test

Generally, the simple payback test was viewed as the most favourable approach to defining cost-effectiveness, and therefore most likely to encourage take-up of energy efficiency improvements. This approach was described as relatively simple and easy to understand, while still incorporating a calculation of the benefits of upgrades in terms of fuel bill savings.

“The simple payback test would be a fairer measure in relation to what an owner is expected to invest versus estimated savings” (Individual).

One noted that the simple payback test was the best approach to adopt because it would allow homeowners to understand why low-carbon solutions are a sensible choice and recognise the benefits of upgrading.

2.18.3 Net present value

Although a few respondents described net present value (NPV) as the most nuanced and realistic calculation, the NPV approach was criticised for a number of reasons, including:

- its reliance on calculating future costs and benefits which are speculative, difficult to forecast and subject to challenge
- NPVs are not widely understood and therefore may impact the effectiveness of this as a metric
- the additional complexity, specialist skills and cost involved are unlikely to justify the usefulness of the output compared to a simple payback test

A few felt that, given the low cost of energy, it would be difficult to justify investments through either the simple pay back test or NPV, arguing that the cost of the improvements would not be met by the savings achieved in the lifetime of the property.

A recurring issue in the responses to this question was the desire for a simpler and more ‘lay-person’ approach to defining cost-effectiveness.

“Homeowners need to understand the basis of the cost effectiveness approach if they are to have confidence in the system and so we are in favour of a more simple blunt instrument rather than a complex calculation” (Professional or representative body).

A few insisted that homeowners and landlords should have autonomy to decide their own approach to cost-effectiveness.

2.19 Responses to Question 19: Other than technical feasibility and cost effectiveness, are there any other reasons why a homeowner may not be able to bring their property up to EPC C at point of sale or renovation, and would need to be given an exemption or abeyance? (For example, difficulties of getting permission from other owners for common parts of buildings.)

125 respondents provided a response to this question. Responses were all free-text.

Respondents described a number of different situations in which they felt homeowners may need to be granted an exemption or abeyance to the proposed standards. The most common reasons are presented below.

2.19.1 Owners of historic/listed buildings

Many respondents strongly believed that listed buildings and historic properties should be exempt from having to meet the proposed standards, because their age, design or baseline condition could pose technical and financial challenges to meeting the EPC Band C standard. They described barriers such as:

- specialist advisers and contractors will be required, which will increase cost and timeframe for delivery
- red tape and regulations will cause difficulty in obtaining planning permission
- current EPC assessments and ratings do not always take the variation and fabric types of traditionally constructed buildings into consideration

Some respondents were also concerned that commissioning significant and invasive works to install energy efficiency improvements could compromise or destroy historic buildings' original fabric and traditional features such as decorative cornices and skirting boards.

2.19.2 Non-detached properties with common areas

Many respondents reiterated the example set out in the question, agreeing that those who have shared ownership of dwellings may find it difficult to get agreement from all relevant parties and buy-in to pursue improvements. One noted that there are more challenges associated with this process than simply obtaining approval from neighbours. These respondents felt that abeyances or exemptions should be granted in such cases.

2.19.3 Homeowners in rural areas

A few respondents commented that homes in rural areas and in the Scottish Highlands and Islands should receive extra consideration and in some cases abeyances because of the extra barriers that they face in completing energy efficient renovations, such as lack of available local contractors and limited capacity and quality of connection to mains electricity.

2.19.4 Affordability

A few respondents felt that exemptions should be granted to homeowners who would be forced into financial difficulty by making improvements to meet the EPC Band C standard. However, other respondents disagreed and felt that the Scottish Government should offer financial assistance or zero-interest loans when affordability is a barrier to the improvements instead of offering an abeyance.

Other circumstances under which some respondents felt abeyances should be granted included:

- if the property is situated in a conservation area
- if an elderly/disabled person sells their home in order to move into a care home
- if homeowners suffer from serious medical conditions or disabilities
- if the property has been inherited

2.20 Responses to Question 20: Do you agree or disagree that, even if a property can't fully meet the standard, it should be required to get as close as possible to it?

Responses to Question 20 are set out in Table 10.

Table 10: Responses to Question 20

Response	No of respondents	% of respondents who answered this question (123)
Agree	86	70%
Disagree	37	30%
Not Answered	25	n/a
Total number of free-text responses	107	n/a

123 respondents provided a response to this question. Over two-thirds of respondents (70%) who answered this question agreed that a property should be required to get as close to the standard as possible if it cannot fully meet it. 30% disagreed.

There was greater support for this proposal among organisations (92%) that answered this question than there was among individuals (54%).

Those respondents who agreed said that while not every property can be made to meet EPC Band C, this should not act as a barrier to making them as energy efficient as possible.

“Exemptions should not allow households to do nothing to improve their property instead they should be required to do what they can to get as close to the standard as is possible” (Building component manufacturers or services).

Some respondents sought clarification as to the definition of the phrase ‘as close as possible’, describing it as vague and open to interpretation.

2.21 Responses to Question 21: Do you agree or disagree that any exemptions or abeyances from the standard should be time-limited?

Responses to Question 21 are set out in Table 11.

Table 11: Responses to Question 21

Response	No of respondents	% of respondents who answered this question (115)
Agree	64	56%
Disagree	51	44%
Not Answered	33	n/a
Total number of free-text responses	122	n/a

115 respondents provided a response to this question. Responses were mixed with 56% of those who answered agreeing that any exemptions or abeyances from the standard should be time-limited, and 44% disagreeing.

Among respondents who answered this question, organisations (85%) were more likely to agree that exemptions or abeyances should be time-limited than individuals (39%).

Respondents who agreed that abeyances should be time-limited felt that homeowners’ personal and financial circumstances may change over time and it would be sensible for exemptions to be kept under periodic review.

Others noted that developments in technology would affect the parameters of what is deemed cost-effective and technically feasible, meaning that new innovations may overcome financial, technical or practical barriers that had previously limited uptake.

Suggestions for the length of time that abeyances should be granted varied from three to ten years. However, some respondents argued that abeyances and exemptions should be permanent because the reasons that the exemptions were originally granted will not change over time, e.g. the property's fabric/listed status.

2.22 Responses to Question 22: Which body or bodies should take decisions about granting abeyances? Should this be done at a local level or centrally at a national level?

120 respondents provided a response to this question. Responses were all free-text.

The majority of respondents said that decisions about granting abeyances should be taken at a local level. Many respondents agreed that local authorities have a more in-depth understanding of local properties and community circumstances which would support them in making decisions about exemptions and abeyances. Respondents once again noted that local authorities would require adequate funding in order to take on this responsibility.

A few respondents suggested the idea of a collaboration between authorities at a local and national level. For example, one respondent suggested that the decision-making process should take place at a local level, but with national guidelines, oversight and a national body in charge of any appeals processes.

Some respondents felt that decisions about abeyances should be made wholly at a national level, either by the Scottish Government or a new carbon-focussed government agency, in order to achieve a greater level of consistency on how exemptions are given across the country.

2.23 Responses to Question 23: The Short Life Working Group (SLWG) on Assessment proposes that any new assessment regime should exist on two levels, comprising both a mandatory asset-based assessment and an optional occupancy-based assessment. What are your views on this approach? Do you agree that an occupancy assessment should be optional? Are there specific inputs that should be included in both?

111 respondents provided a response to this question. Responses were all free-text.

Respondents expressed various views related to the proposed assessment regime, with some agreeing with the proposal and others expressing different views about the assessment process.

The largest group of respondents who expressed a clear view agreed with the proposal of the Short Life Working Group (SLWG) for two levels of assessment,

with a mandatory asset-based assessment and an optional occupancy-based assessment.

However, there were some variations in views between different types of respondents, with organisational respondents more likely to agree with the proposal than individuals.

Respondents who agreed with the SLWG's proposal recognised the importance of taking factors related to occupancy into account. However, they agreed this form of assessment should be optional because these assessments become invalid over time as occupancy levels change, including when the owner moves out.

"I can accept that occupancy-based assessment may be out of date as soon as another owner moves in, or the current owner's circumstances change (e.g. from working to retired), however total disregard for occupancy patterns also seems wrong so a two level approach seems right" (Individual).

A minority of respondents felt that the occupancy-based assessment should be mandatory, in addition to the asset-based assessment. These respondents highlighted the importance of occupancy-based assessments in taking into account a property's occupants' actual energy use and identifying appropriate energy efficiency improvements tailored to the property and its occupants.

A minority of other respondents, all individuals, agreed that the asset-based assessment should be mandatory, but felt there was no need for any occupancy-based assessment.

Some respondents felt there should be only one level of assessment. While these respondents expressed various conflicting views about the type of assessment that should be used and whether it should be mandatory or optional, they agreed that having one level of assessment would make the process more streamlined, easier to understand and less costly for homeowners.

2.24 Responses to Question 24: The SLWG on Assessment proposes that the output of the assessment should be a report with tailored recommendations that set a clear pathway to both regulatory compliance (i.e. EPC Band C) and zero carbon. There are conflicts between meeting the EPC rating and zero carbon. What are your views on how this can be handled/mitigated?

109 respondents provided a response to this question. Responses were all free-text.

Responses to this question were very varied, with little consensus. Most comments focused on the relative merits of focusing on either the EPC or zero carbon, with few respondents suggesting ways to mitigate the conflict between the two. While a minority agreed that the assessment should focus on both the EPC and zero carbon, others felt the focus should be on one or the other.

2.24.1 Focus on the EPC

The largest group of respondents, although still a minority, felt that the assessment should focus primarily on achieving EPC Band C. One of the main arguments for this was that there is already a substantial level of public awareness of the EPC assessments.

There was a view among a few respondents that zero carbon, on the other hand, is a concept that is not clearly defined and not widely understood among the public.

A few respondents specified the focus should be on the EPC certification process because of the assessment's focus on 'fabric first' improvements that would contribute to lowering carbon in the long term. However, while these respondents felt the focus should be on the EPC certification process, a common view was that zero carbon should not be entirely discarded, with suggestions that the assessment should include recommendations related to zero carbon being presented as advice that homeowners can act on if they wish.

2.24.2 Focus on zero carbon

A minority of respondents argued that achieving zero carbon is the long-term goal and should take precedence over EPC Band C.

A few respondents suggested that homeowners might need incentives or financial support to implement actions that lower their carbon use. A few also noted the importance of ensuring that homeowners are not penalised if their actions to reduce carbon emissions mean that, by installing a system using a form of fuel that is currently more expensive than carbon-based fuel, their energy efficiency rating is adversely affected.

2.24.3 Focusing on both EPC and zero carbon

A minority of respondents expressed clear support for the SLWG's proposal to focus on recommendations that set out a clear pathway to achieving both EPC Band C and zero carbon. Respondents made a few suggestions about how the conflict between achieving these could be mitigated, most notably the provision of a clear report with recommendations laid out in order of priority.

A few respondents noted that conflict between the two aims is inevitable, but homeowners should be encouraged to implement as many recommendations as possible.

2.25 Responses to Question 25: The new assessment proposals from the SLWG on Assessment include more of an advisory role for the assessor. What are your views on the additional skills and training required to deliver this role? Are existing Domestic Energy Assessors best placed to provide the tailored recommendations? What risks and conflicts do you foresee and how would you propose to mitigate them?

105 respondents provided a response to this question. Responses were all free-text.

Responses were fairly evenly split with regards to whether Domestic Energy Assessors (DEAs) or another profession should take on an advisory role and deliver tailored recommendations to homeowners.

Some respondents agreed that DEAs are best placed to fulfil this role because these assessors are already established and have relevant skills gained from their role in delivering EPC assessments. However, the consensus among the majority of these respondents was that the DEAs would require further training to enable them to deliver the advisory role effectively.

“The new proposals require more of an advisory role for the assessor, which is welcomed, but which will also require greater knowledge, understanding and professionalism on the part of assessors” (Local authority or interagency partnership).

Some other respondents felt that DEAs are not best placed to take on this role. These respondents felt that DEAs lack the necessary skills and knowledge and a few compared the SLWG’s proposal to the arrangements under the Green Deal programme, which they described as unsuccessful. These respondents argued that other professionals with greater skills and knowledge related to buildings and construction, such as surveyors and architects, should undertake this role.

There was some disagreement between individual and organisational respondents in relation to this question. The consensus among organisations was that (upskilled) DEAs should take on the advisory role, while individuals were more likely to argue that other professionals should fulfil this role.

Some respondents made comments about the skills and training required to deliver this advisory role. These include technical knowledge about buildings and energy efficiency, customer service, report writing and inter-personal skills.

“Whilst qualifications in producing EPCs would be a good starting point, new certificated qualifications need to be devised to provide upskilling in customer service, finance, building defects as a bare minimum” (Local authority or interagency partnership).

“If assessors are to take on more of an advisory role we believe it would make sense for consideration to be given to providing them with the same level of training as Home Energy Scotland advisors” (Scottish Government delivery partner).

Another issue raised by a minority of respondents was the importance of ensuring that impartial advice is provided. A few specified that the people delivering the advice should be independent of any construction firms or installers to avoid potential conflicts of interest, and there was a suggestion from a few that they should be employed by the state or an independent body accountable to the Scottish Government.

A minority also highlighted the importance of quality assuring the advice and recommendations provided, with suggestions including establishing an accreditation, licensing or inspection process.

2.26 Responses to Question 26: The SLWG on Assessment proposes that the tailored recommendations to improve energy efficiency and achieve zero carbon should consider the legal designation of buildings, obvious defects or condition issues, and local costings. Do you foresee any liability issues in this approach and if so, what suggestions do you have to mitigate them? Do you believe the inclusion of local costings to be practical and what are your thoughts on what level should be considered ‘local’? Should the local cost of energy also be considered?

102 respondents provided a response to this question. Responses were all free-text.

Responses focused on two key elements: issues around liability and the importance of considering local costings in the recommendations.

2.26.1 Liability

Respondents made various comments around liability. In particular, some expressed concerns about who would be liable for any unnecessary or inappropriate work carried out as a result of an inaccurate assessment. To mitigate this, respondents made various suggestions including:

- appointing appropriately qualified professionals, who hold professional indemnity insurance, to make the assessments (this is an issue that is covered in the analysis of Q27)
- placing an onus on homeowners to check the information provided before carrying out any work
- involving other professionals and/or installers to check or verify the assessments and recommendations made

- referring to nationally standardised data and comparators to inform advice, recommendations and costings
- using elements of the approach outlined in PAS 2035

“The liabilities related to these recommendations would appear to be the same as any other building survey liabilities; a properly qualified professional should be commissioned who carries professional indemnity insurance” (Professional or representative body).

A few respondents reported concerns around properties with shared spaces such as tenements. These respondents were concerned that there could be disputes where individual owners in this type of property might be reluctant or refuse to contribute to the cost of works in shared areas.

Another concern expressed by a few respondents focused on listed and historic buildings. These respondents noted that these buildings have unique characteristics and challenges, so assessments should only be carried out by professionals who are appropriately qualified or accredited in working with this type of building.

2.26.2 Local costings

The majority of respondents who expressed an opinion agreed that local costings, including the cost of energy, should be considered in assessments. The consensus was that it is important to include local costings to reflect local variations, particularly between rural and remote communities and urban areas, in energy costs, the availability and cost of installers and tradespeople, living costs, and wages.

“Local costings are the only fair method, due to the likely variation in price between city centres and remote rural areas” (Individual).

2.26.3 Definition of ‘local’

Only a small number of respondents expressed an opinion on what level should be considered ‘local’. The consensus among those who did, however, was that it should be defined by local authority area.

2.27 Responses to Question 27: The SLWG on Assessment proposes that the assessment should provide a theoretical indication of whether recommendations are technically feasible. Please provide your views on who should determine actual technical feasibility? Should this be a qualified installer or someone else?

110 respondents provided a response to this question. Responses were all free-text.

Responses for and against the suggestion that qualified installers should determine the actual technical feasibility of recommendations were fairly evenly balanced.

Some respondents agreed that qualified installers should fulfil this role because of their expertise, experience and knowledge of the materials and equipment.

Some other respondents, however, felt that other professionals, such as surveyors, architects and engineers would be better placed than installers to assess actual technical feasibility. These respondents explained that these professionals' qualifications and accreditations would make them more suited to this role than installers.

“In my view assessors for this type of work should firstly be qualified building professionals (Architect or Chartered Building Surveyors) and secondly have appropriate accreditation in the field they are working in, for example new build, or conservation / traditional buildings” (Individual).

Some respondents noted the importance of the person assessing technical feasibility being independent of the work being carried out. While a few specified that installers could carry out this assessment as long as they were not undertaking any of the proposed work, others feared that installers' judgements could be influenced by any professional gain they would stand to make from the proposed work, and would rather this role was fulfilled by another profession.

“We consider that technical feasibility should be determined by an appropriately trained and qualified independent building professional, such as a building standards officer, building surveyor, architect etc, to avoid bias towards specific measures or materials” (Public sector body).

A minority of other respondents argued that it did not matter which profession the person who carries out this assessment belongs to, as long as they are suitably qualified.

There was a suggestion among a few other respondents that EPC assessors could be upskilled to provide this assessment in order to streamline the number of people that homeowners need to consult in this process.

A minority suggested a role for statutory bodies, either through direct involvement in assessing technical feasibility or by accrediting or approving the professionals making the assessment.

“The government should set up a properly resourced specialised agency like Norway's post-war reconstruction Husbank to implement this programme and not leave it to a hotch potch of private contractors” (Individual).

A few other respondents, however, were of the view that statutory bodies should not be involved in the process.

2.28 Responses to Question 28: In your view, what are the most important considerations for homeowners who are required to meet the legally-binding standard, in relation to skills, supply chain, consumer protection and quality assurance?

122 respondents provided a response to this question. Responses were all free-text.

Respondents identified various considerations that would be important for homeowners, including quality assurance, the availability of installers, the need for advice and support, and a complaints and redress process.

2.28.1 Quality assurance

Some respondents emphasised the importance of implementing a system to assure the quality of the work undertaken to help homeowners meet the standard. A common suggestion was the adoption of an accreditation or 'kitemark' scheme to ensure that installers meet minimum quality standards. It was suggested that this could help to ensure consumer trust in the process. A few respondents suggested that PAS 2030¹⁵ or PAS 2035¹⁶ could be used to inform this.

“Consumer trust in installers and any certification or quality mark employed is key to ensuring the long-term viability of both the quality mark and buy-in from consumers to energy efficiency and low carbon technologies” (Third sector organisation).

There was a view among some respondents that this would be important to protect consumers against unscrupulous companies.

2.28.2 Availability of installers

A minority of respondents noted that placing a requirement on homeowners to meet this standard will increase demand for and reduce availability of installers. This could affect some homeowners' ability to meet the required standard within the proposed timescale.

2.28.3 Need for advice and support

Some respondents emphasised the need to provide advice and support for homeowners in meeting the standard. There were suggestions that the Scottish Government should create an agency or 'one-stop-shop' to guide people through

¹⁵ PAS 2030 which was redeveloped in conjunction with PAS 2035, covers the installation, commissioning and handover of retrofit projects.

¹⁶ PAS 2035 covers how to assess dwellings for retrofit, identify improvement options, design and specify Energy Efficiency Measures (EEM) and monitor retrofit projects. Both PAS standards are sponsored by the UK Government's Department for Business, Energy and Industrial Strategy (BEIS).

the process, and a few noted that the Home Energy Scotland programme could provide a basis for this.

“The government should set up a specialised agency to deal with all this and actually help people to achieve this, not stand by with a big stick to slap somebody down who is totally overwhelmed by the cost and technical complexity of it all” (Individual).

A few respondents noted that some homeowners will require work to be carried out by several tradespeople, and they may require support to project manage all the trades involved.

2.28.4 Process for complaints and redress

A minority of respondents, mostly local authorities and professional or representative bodies, identified the need for an effective process to support homeowners when work is not completed to a satisfactory standard. Suggestions included appointing an ombudsman or independent adjudicator to oversee or resolve complaints.

2.29 Responses to Question 29: What are your views on how the Quality, Skills and Consumer Protection SLWG recommendations specifically have an impact on the owner-occupied sector?

97 respondents provided a response to this question. Responses were all free-text.

Respondents' comments in response to this question focused largely on quality assurance, skills and the impact of the standard on homeowners.

2.29.1 Quality assurance

Respondents emphasised the importance of ensuring robust quality assurance processes around assessments and the work carried out as a result. A common theme was the need to involve the government in developing quality assurance standards and processes, in order to protect the public from rogue traders.

Another common theme was the importance of introducing a quality mark to certify that an installer has met nationally-defined standards for quality. A few suggested that this should be informed by, or aligned with, the UK Government's TrustMark¹⁷ scheme. A few also observed that the Each Home Counts¹⁸ review, PAS 2030 and PAS 2035 could inform the development of quality standards.

“To investigate further the proposal of a Quality Mark for Scotland, the progress of the Trustmark scheme in England could be reviewed to see what

¹⁷ <https://www.trustmark.org.uk/>

¹⁸ <https://www.gov.uk/government/publications/each-home-counts-review-of-consumer-advice-protection-standards-and-enforcement-for-energy-efficiency-and-renewable-energy>

has worked well and what not so well” (Private landlord or property management).

2.29.2 Skills

A few respondents commented on the need to support businesses in this sector to ensure they have the skills to deliver the work to the required standard of quality.

2.29.3 Impact on homeowners

A few respondents noted the financial cost and stress that meeting the standard could cause for homeowners.

A few respondents also suggested that the requirement to meet the standard could adversely affect the housing market and property prices.

2.30 Responses to Question 30: In your opinion, is this the right range of Scottish Government financial support schemes? Are there any gaps, regarding either types of financial product or groups of people who may be excluded from being able to access products?

108 respondents provided a response to this question. Responses were all free-text.

The consultation document set out a range of proposed financial support for homeowners to upgrade their properties to meet the required energy efficiency standard and respondents were broadly in favour of the support proposed by the Scottish Government.

Some respondents emphasised the importance of grants. A recurring theme was that the criteria for awarding these grants should be carefully defined to ensure that those who most need support receive it, including those who are not necessarily defined as being in fuel poverty but who require support to afford the work necessary to improve their home’s energy efficiency.

“There is a clear need to focus grant aid on the most vulnerable, but also to be aware that this can be bounded too narrowly – leaving a gap in provision for those that fall just outside of eligibility criteria” (Third sector organisation).

A few suggested that the criteria for awarding grants should take the potential cost-effectiveness of the proposed work into account.

“To this extent the list of energy efficiency measures could be ranked on impact and grant funding concentrated on those offering best value for money and cost savings for the owner-occupier” (Individual).

There was also support among respondents for low or no interest loans, particularly for homeowners who do not meet the criteria for grants.

Some respondents identified tax breaks as an effective way to incentivise homeowners to finance energy efficiency improvements. These could include, for example, making these improvements exempt from VAT, and/or offering lower rates of Council Tax for properties that meet a certain energy efficiency rating.

Other suggestions for financial support included equity release schemes and mortgages that provide financial incentives for energy efficient properties.

Some respondents identified specific groups who might be in particular need of financial support, or face barriers to accessing it. These included older people, residents of listed buildings or conservation areas, and crofters.

“We need a package, including Home Equity release, for households to tap into to pay for retrofits. This is particularly the case for the elderly who are often cash poor asset rich” (Third sector organisation).

2.31 Responses to Question 31: Do you agree or disagree that grant funding from the public purse should be focused on households who are vulnerable or in fuel poverty?

Responses to Question 31 are set out in Table 12.

Table 12: Responses to Question 31

Response	No of respondents	% of respondents who answered this question (117)
Agree	73	62%
Disagree	44	38%
Not Answered	31	n/a
Total number of free-text responses	113	n/a

117 respondents provided a response to this question. Of those respondents that answered the question, many (62%) agreed that grant funding from the public purse should be focused on households who are vulnerable or in fuel poverty. Just over a third (38%) disagreed. Organisations (85%) that provided a response were more likely than individuals (46%) to support this proposal.

Those respondents who supported the proposal felt that some people will need financial support to meet the new standard and that public money should be allocated to people who need it most.

Some of those who disagreed with the proposal felt that grant funding should be open to all homeowners. Respondents gave various justifications for this point of view, including that people who are vulnerable or in fuel poverty already receive

support from the public purse, and that public funding should be available to everyone because everyone will be required to meet the standard.

Some other respondents, while not going as far as to say that the support should be available to all, felt that public funding should be available to a wider range of homeowners. Suggestions for other groups that should be targeted (some of which, it should be noted, may already be included in the definition of 'vulnerable') include older people, young families, the working poor and women who are nearing retirement age.

2.32 Responses to Question 32: In your opinion, what sources of non-government, private sector support are people most likely to want to access? (e.g. from banks, building societies, credit unions, mortgage providers)

108 respondents provided a response to this question. Responses were all free-text.

Respondents were mixed in their views about the sources of non-government, private sector support that they thought people were most likely to want to access.

Many respondents thought that banks were likely to be one of the most popular sources of finance for homeowners who do not have sufficient savings to make the energy efficiency improvements that would be required if the standard became legally-binding. Loans, green deal loans, extensions to mortgages, and equity release schemes were most commonly cited by respondents as likely to be popular.

However, many respondents emphasised the importance of government control of interest rates on loans for energy efficiency improvements to ensure that homeowners are not forced into unreasonable and unaffordable arrangements. In addition, some respondents suggested it was important that funds were only released by banks for work undertaken by government-approved tradespeople, with one respondent suggesting that final funds are withheld until work has been inspected and confirmed as reaching the appropriate standard.

Some respondents also suggested that banks could incentivise energy efficiency improvements and the purchase of energy efficient homes. Suggestions as to how banks could do this included, for example, the introduction of an energy performance factor into their lending policies to allow those with more energy efficient homes to borrow greater sums of money.

Another respondent suggested that long-term financing options like energy efficiency conditional mortgages could help to increase demand for energy efficient properties.

“Long-term financing options like energy efficiency conditional mortgages should encourage homeowners to seek out homes with a better EPC rating. Mortgage lenders could offer better rates predicated on improvements to the energy efficiency. The decrease in energy bills over the span of

homeownership could lead lenders to offer bigger mortgages than they would have otherwise, stimulating homeownership” (Professional or representative body).

A few respondents made reference to the Scottish National Investment Bank and the role it could play.

“The Scottish National Investment Bank could have a role to play in working with local authorities to raise the finance to implement local heat and energy efficiency strategies by aggregating the retrofit opportunity into bigger projects for private investment” (Third sector organisation).

Many respondents felt that the Scottish Government should be involved in providing financial support to homeowners to make the necessary energy efficiency changes to their properties. Their proposals ranged from raising income tax for higher earners to providing additional grant funding; the Scottish Government taking part ownership of some properties (a government-backed equity release scheme); incentive schemes; grants or partial grants; and grants repayable on sale or transfer of homeownership.

“There will be a range of non-government sources of support that people will seek, for example, green mortgages, however, it is our belief that the Scottish Government has a responsibility to ensure that people do not need to rely on other sources for funding these efforts” (Scottish Government delivery partner).

A few respondents noted the importance of ensuring that the implementation of the standard does not work against the ability to access Energy Company Obligation (ECO) funds which the UK Department for Business, Energy and Industrial Strategy (BEIS) has committed to.

Some respondents were strongly of the view that homeowners should not be required to borrow money to make energy efficiency improvements to their homes and that government grants were the only route that should be considered.

2.32.1 Other forms of finance

A number of other forms of financing improvements were also made. For example, one respondent suggested that inter-connectors and multiple wind turbines could be installed and would generate enough energy to supply the majority of need in the Western Isles.

Another respondent suggested that the Scottish Government should encourage the private sector to develop and offer a range of green finance products that specifically target home improvements to meet the requirements of any legally-binding standard, citing the Green Finance Taskforce’s proposals for how new long-term low carbon finance products can help, for example through green mortgage-style products or an adapted Green Deal style regime.

Another respondent cited the Sustainable Energy Association's (SEA) able-to-pay report¹⁹ which outlines a range of financial levers that could be used such as Help-to-Save schemes for energy efficiency improvements, and savings schemes like the Lifetime ISA which rewards responsible management of personal finances and could encourage consumers to save more towards efficiency improvements.

¹⁹ <https://www.sustainableenergyassociation.com/resources/energy-efficiency-policy-pathway/>

Chapter 3: Cross-cutting themes

A number of cross-cutting issues were raised across responses to questions posed in the consultation. In particular, issues were raised in relation to challenges with older buildings; the impact in rural areas; how to ensure compliance with the standard; concerns regarding the EPC certification process; the financial impact on owners; how best to incentivise change; the knock-on effect on the housing market; and the need for more extensive information sharing. These are explored below.

3.1 Challenges of older and listed buildings

Many respondents raised concerns in relation to improvements to older and listed buildings. Specifically, their concerns related to: the high costs of energy efficiency improvements in older properties; changes which would impact negatively on the fabric or character of the property (particularly listed properties); and limitations to changes that can be made to some older properties, including listed building regulations that preclude some types of improvements, for example cladding or double glazing.

In addition, introducing a standard “retrospectively” to address deficits in older properties was considered by some to be unreasonable.

“Agree that a standard is needed as the basis of achieving targets, BUT this must not be a ‘one size fits all’: the standard must have inbuilt flexibility to cater for buildings of different construction types. Otherwise there would be a very high risk of wasting money and carbon on inappropriate works, and further money and carbon on subsequent rectification. The methodology for calculating the standard must not impose inappropriate modern criteria upon historic and other buildings of traditional or unconventional construction, and should take into account the actual performance of materials in historic and traditional building fabric. The ability to make this legally-binding has to be questioned” (Professional or representative body).

Many respondents highlighted challenges likely to arise in relation to older properties and the need to acknowledge that achieving EPC Band C may not be possible in some of these properties. Some felt that the standard to be attained should vary depending on the age of the property, and emphasised the importance of having people undertaking the assessments who have the appropriate skills and expertise in the range of available technologies and the building type under assessment.

In relation to EPC assessments, some respondents argued that these were based on assumptions about the building, including occupancy behaviour, building age, construction, location, hot water and heating systems.

Some respondents felt there was a case for exemptions for properties where the full range of possible fabric energy efficiency improvements had been applied but EPC Band C still could not be attained.

A few respondents also highlighted the challenges for owners living in, for example, a tenement which can make it difficult to get agreement from all owners to undertake any improvements to the building.

Some respondents felt that any legally-binding standard should only apply to new-build properties and that for other properties it should be optional, with better advice and incentives provided.

3.2 Impact on rural areas

Some respondents raised concerns about homes in rural areas in particular, pointing out that there is a higher proportion of older properties in these areas which could make any minimum standard more difficult and costly to achieve.

Respondents were concerned that introducing the standard would have a significant impact on poorer rural households due to the substantial number of homes in fuel poverty (and extreme fuel poverty), and the limited options for heating systems. Some noted that many rural properties were unlikely to ever be able to meet EPC Band C without significant work and high costs.

Some respondents also noted that homeowners with the least energy efficient homes are often those on low to middle incomes who would struggle to pay for improvements, although they would not necessarily be on benefits or classified as in fuel poverty. They were concerned that these people could face hardship if the standard is made legally-binding.

A few respondents noted that homeowners and house builders in rural areas have to spend more money on homes off the gas grid, compared to an identical home on the gas grid. This was seen to be unfairly and unjustly penalising rural areas, homeowners and house builders for no other reason than the fact that they do not use mains gas.

Some respondents also raised concerns about the availability of skilled tradespeople to undertake the volume of improvement work which would be needed if the standard were to become legally-binding, with particular concerns about island communities who already have insufficient tradespeople to carry out work.

3.3 Ensuring compliance

Many respondents referred to the importance of ensuring an effective regime to monitor compliance with the standard. Some respondents called for strong enforcement and penalties for non-compliance.

A few respondents noted concern about the capacity of local authority planning departments to take on any compliance role as they were considered to be already stretched. One respondent called for a national central agency to oversee implementation of any such standard. Another noted that minimum energy efficiency standards may be better understood and publicly acceptable if seen as

part of a wider set of housing quality standards, with an emphasis on health, safety and well-being, such as the Repairing Standard (RS) for private housing, and the Scottish Housing Quality Standard (SHQS) for social housing.

Some respondents were also of the view that there would need to be some form of accreditation of EPC assessors to give homeowners confidence that the rating and recommendations of energy efficiency improvements given at point of survey is accurate.

3.4 The EPC

In responses to a number of the consultation questions, some respondents raised concerns about the appropriateness of the EPC as the mechanism for measuring energy efficiency in people's homes and whether it was the right process by which homeowners should be held accountable to any legally-binding standard. Some specific concerns raised by respondents included concerns that the U-values used in the method are based on calculations rather than actual representative in situ field measurement; a concern that, depending on the building, the energy rating would vary with fuel type; a concern that EPCs are encouraging homeowners to move to higher carbon, more polluting fuels such as coal and oil simply because they are cheaper because the EPC Energy Efficiency Rating (EER) calculation is a measure of energy cost per square metre.

Respondents made a number of suggestions for alternative energy efficiency improvements which included:

- the Environmental Impact Rating part of the EPC being used as an alternative measure in the first instance
- a strong role for Local Area Energy Planning as part of the wider framework of energy efficiency improvements to deliver building de-carbonisation
- a smarter, more accurate and valid new system of Carbon Performance Certification, harnessing digitalisation and better measurement of building carbon performance. A new system of Carbon Performance Certification could make use of smart metering data to derive accurate annual estimates of emissions at property level.

3.5 Financial impact on homeowners

Many respondents raised concerns about the financial impact on homeowners of meeting the standard. Some highlighted that it would disproportionately affect some groups of people including older homeowners (on fixed incomes who may be less able to find funds to make the changes required, and who may struggle to find trusted traders); people living in fuel poverty; people living in rural areas (as already noted); people living in homes which have an EPC Band of E, F or G; and owners of older, and particularly listed, properties.

Some respondents emphasised the importance of homeowners being able to file for exemption for free and as easily as possible, whilst emphasising that there

should be strict conditions under which not meeting the target could be considered acceptable.

Some respondents felt that the standard should only be legally-binding if financial assistance was available to improve properties.

3.6 Incentivising change

Many respondents made reference to the need to incentivise change should the standard be legally-binding. Some respondents emphasised that consumers should not be disadvantaged by any legally-binding standard based on the type of home that they owned; while others argued that there needed to be a mix of incentive-based policies and direct regulation, balancing the carrot and stick approach across the whole policy spectrum.

Suggestions included the need for loans with long pay-back periods; government grants; the potential of extending the Renewable Heat Incentive²⁰, currently due to close in 2021, to help with the installation of low carbon systems and to reduce 'distress purchases' of a like-for-like fossil fuel heating system; a boiler scrappage system; and tax discounts (including Council Tax discounts). Some felt that any support should be means-tested whereas others argued that it should not.

3.7 Impact on the housing market

Some respondents raised concerns about the impact on the housing market of making the standard a legal requirement. Respondents raised concerns that costs associated with making improvements to comply with the standard could result in fewer properties coming to market. Respondents raised concerns in particular about the potential lack of availability of properties for first-time buyers. Some noted that requirements under the standard could discourage older people, in particular, from downsizing into smaller and more suitable homes.

Some respondents felt that it could impact on the flexibility of the housing market and people's ability to buy homes, establish households, move jobs, downsize or fulfil their duties as personal representatives of the deceased in the case of inherited properties. In raising these concerns, one respondent described the additional costs as "an increased transactions tax" which would not only add to the cost of a property sale, but could also deter transactions, lower prices and freeze the market.

3.8 Improving information sharing

Some respondents highlighted the importance of ensuring that members of the public were well informed about options for energy efficiency improvements,

²⁰ The Renewable Heat Incentive is a UK Government scheme that enables homeowners to receive quarterly cash payments over seven years if they install or have already installed an eligible renewable heating technology. (<https://energysavingtrust.org.uk/grants-and-loans/renewable-heat-incentive/>)

particularly if the standard were to become legally-binding. Suggestions included ensuring that consumers are made sufficiently aware of new and efficient technologies to enable them to make informed decisions; and making case studies and demonstration projects available to highlight the benefits of taking action.

Some respondents also highlighted the need for consumers to be aware of the likely financial impact of any legally-binding standard to enable them to plan their finances accordingly.

A few respondents also highlighted the importance of ensuring that there is widespread understanding of EPC/energy ratings, noting that many consumers currently do not take the energy rating into account when purchasing a property.

Others noted the importance of guidance encouraging consumers to take longer-term decisions about their property.

Chapter 4: Views expressed about the consultation process

Respondents gave feedback about their views of the consultation process which is summarised in Table 13.

Table 13: How satisfied were you with this consultation?

	No of respondents	% of respondents who answered this question (114)
Very satisfied	24	21%
Slightly satisfied	24	21%
Neither satisfied not dissatisfied	31	27%
Slightly dissatisfied	16	14%
Very dissatisfied	19	17%
Not answered	34	n/a

114 respondents provided a response to this question. The largest proportion of respondents were either very or slightly satisfied with the consultation (42% of those who answered the question), while 31% were either very or slightly dissatisfied. 23% of all respondents did not answer this question.

Organisations were more likely than individuals to express satisfaction with the consultation (61% of organisations were either very or slightly satisfied compared with 31% of individuals).

Some respondents praised the consultation for its comprehensiveness, the way it presented the proposals and the opportunity it gave respondents to comment.

However, other respondents gave negative feedback about the consultation. Some felt the document was too complicated and difficult to understand, and a few felt this could skew the responses by deterring anyone unfamiliar with the technical language used from responding. Some felt the consultation document was too long, and again a few felt this could deter people from responding.

A few respondents suggested that feedback could have been collected from members of the public in other ways, such as public meetings, rather than relying solely on an online platform. These respondents argued that the issues were too complex for an online form, and/or that some members of the public were not aware of the online consultation.

When reading the analysis, it is important to bear in mind that the respondents are self-selecting, as noted in the methodology section, and that some members of the public might have been deterred from responding because of the complexity of some of the issues, the length of the document, and/or because the consultation was conducted online.

Respondents were also asked to provide feedback about their views of using the Citizen Space platform to respond to this consultation (Table 14).

Table 14: How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?

	No of respondents	% of respondents who answered this question (112)
Very satisfied	42	38%
Slightly satisfied	27	24%
Neither satisfied not dissatisfied	25	22%
Slightly dissatisfied	10	9%
Very dissatisfied	8	7%
Not answered	37	n/a

112 respondents provided a response to this question. In general, respondents were satisfied with Citizen Space. Of those who answered the question, 62% reported being very or slightly satisfied with the platform, while 16% said they were very or slightly dissatisfied. 24% of all respondents did not answer this question. Responses from individuals and organisations were broadly similar, although a slightly larger proportion of organisations were very or slightly satisfied than individuals (67% compared with 59%).

Most comments were positive, with some respondents praising Citizen Space for its ease of use. A few were particularly appreciative of the function that allowed them to save their response and return to it later.

A few respondents said they would have preferred to submit a response via a Word document, particularly organisations where a number of people are involved in compiling a response. It should be noted, however, that respondents were able to submit responses in different formats, and indeed 22 respondents provided offline responses, including email attachments that the Scottish Government uploaded to Citizen Space.

Chapter 5: Conclusions

The Energy Efficient Scotland: Improving Energy Efficiency in Owner-Occupied Homes consultation document set out the Scottish Government's proposals for the nature of the proposed energy efficiency standard for owner-occupied homes (EPC Band C or better), and for the intention to make this legally-binding from 2024. The consultation invited feedback from the public to inform measures around energy efficiency in the owner-occupied sector, and have been incorporated into the update to the Energy Efficient Scotland Route Map as part of the draft Heat in Buildings Strategy, which will be published in February 2021.

The consultation exercise ran from 19 December 2019 to 9 April 2020 and this report has presented an analysis of responses to this consultation.

The questions were wide-ranging, and findings related to each of them have been outlined in detail in this report. Many of the views expressed were mixed, with numbers of respondents in favour of the proposals often being similar to those against the proposals overall. Organisations tended to be more likely to be in favour of proposals than individuals.

A number of key findings emerged from the consultation and these are summarised below.

Of the quantitative questions which were asked, and required an agree/disagree response, the following findings emerged:

- There were mixed views on whether there should be a legally-binding standard, with organisations being more likely to support this than individuals.
- A majority of respondents agreed that EPC Band C should be the standard required to be met by homeowners, but a substantial number of respondents raised concerns about the effectiveness of the EPC including among them half of the professional bodies responding to the consultation.
- A majority of respondents disagreed that 2024 is the right start date for the mandatory standard to start operating, with many stating that it was too early. Organisations were more likely to be in favour of this start-point than individuals.
- The majority agreed with the proposal that the point of sale should be a trigger point for a property to meet the legally-binding standard. However, almost as many disagreed, with concerns that this could negatively impact on the housing market.
- The majority of respondents agreed that point of major renovation should be a trigger point for a property to meet the legally-binding standard, with agreement levels particularly high among organisations. Individuals responding were more mixed in their views, with some concerns about additional costs being added to already costly renovations.

- Many respondents - 70% - agreed that, even if a property can't fully meet the standard, it should be required to get as close as possible to it.
- There were mixed responses to the proposal that any exemptions or abeyances from the standard should be time-limited, with organisations more likely than individuals to agree.
- Most respondents agreed that grant funding from the public purse should be focused on households who are vulnerable or in fuel poverty, although views were more mixed among individuals than organisations (who were largely in favour).

In addition, a number of cross-cutting issues emerged from the research. These are described below:

5.1 The impact on homeowners in rural areas

On numerous occasions respondents made reference to a potential negative impact on homeowners in rural areas if the standard were to become legally-binding. This related frequently to the higher proportion of older properties in rural areas, and the challenges of getting older properties to meet the standard – these challenges included the potentially higher cost of energy efficiency improvements for older properties, and difficulties in accessing tradespeople. In addition, respondents noted that many properties in rural areas were off the gas grid and therefore have to consider different options in relation to making their property energy efficient.

5.2 Concerns about vulnerable groups – older people and those in fuel poverty

Some respondents were concerned that older people, and people living in fuel poverty were likely to be most adversely affected financially if they were required to make costly energy efficiency improvements to their homes in order to meet the standard. Some respondents noted that these two groups of people were also more likely to be living in properties which were more difficult to upgrade.

5.3 Challenges facing owners of older homes

Many respondents noted the high number of older homes in Scotland which were below EPC Band C currently, and the high costs that could be involved in making the necessary energy efficiency improvements to these properties to achieve this rating. Some respondents were concerned that these changes would be unaffordable to many homeowners and that financial assistance would be required. Others were of the view that decisions to make such changes to properties should be the choice of the owners and not mandated by government.

5.4 Need for adequate finance and information to incentivise people to make changes

Respondents noted the need to raise awareness among the public of the benefits of meeting the standard; the finance available to support energy efficiency improvements to be made; and sources of advice, support and technical help.

5.5 Affordability and financial support

Many respondents raised concerns that the energy efficiency improvements required to meet the standard could be prohibitively expensive for homeowners. Some emphasised the impact this could have on the housing market, particularly if the point of sale became the point at which compliance was required. They were concerned that this could result in people not moving home or downsizing, which would lead to blockages in the housing market.

Respondents were widely in favour of financial support being made available, with mixed views about whether this should take the form of loans, equity release schemes, grants or other forms of support.

5.6 Need for changes to the EPC

Many respondents raised concerns about the effectiveness of the metric used to measure energy efficiency within the EPC. Individuals and representatives of professional bodies were most concerned that it was not an appropriate measure of energy efficiency in homes. Some called for it to be revised while others felt that another mechanism entirely should be used.

5.7 Need for compliance to be monitored and penalties to be issued for non-compliance

The need for a robust compliance regime was highlighted more generally as essential if the standard were to become legally-binding. There were mixed views about where any compliance body should sit – with some respondents suggesting this should be the role of local authorities and others calling for an independent body to be set up to ensure compliance. Many noted the importance of staff involved in compliance monitoring having the right experience and being well trained.

5.8 Ensuring impartial and appropriate assessments and recommendations

Another key theme was the need to ensure that assessments of a property's energy efficiency rating, and any subsequent advice and recommendations for work to bring the property up to the required standard, are made appropriately. Some respondents agreed with the proposal that Domestic Energy Assessors could provide this advisory role, although many of these respondents felt they would require upskilling to fulfil this role, while others felt that other professionals such as architects and surveyors would be better placed to take on this role.

Another recurring theme among respondents was the need to ensure that whoever undertakes the assessment provides impartial advice and should not stand to gain in any way from the proposed work.

5.9 National standards

Some respondents emphasised the need for national standards or a scheme for accreditation/approval of installers, potentially backed by statutory bodies to ensure that any energy efficiency improvements made to homes are completed to a high standard.

Appendix 1: Frequency tables

NB: Some totals do not sum to 100% due to rounding

Q1. Do you agree or disagree that there should be a legally-binding energy efficiency standard for owner-occupied housing?

	Agree	Disagree	Not Answered	Total
Organisations:				
Academic	2 (100%)			2
Building component manufacturers or services	4 (100%)			4
Community group		3 (100%)		3
Energy-related private sector	8 (67%)	1 (8%)	3 (25%)	12
Local authority or interagency partnership	8 (80%)		2 (20%)	10
Anonymous organisation	1 (100%)			1
Private landlord or property management	1 (100%)			1
Professional or representative body	11 (46%)	8 (33%)	5 (21%)	24
Public sector or body – other	1 (50%)		1 (50%)	2
Scottish Government delivery partner	2 (100%)			2
Third sector	7 (88%)	1 (12%)		8
Total organisations	45 (65%)	13 (19%)	11 (16%)	69
% of organisations answering (58)	78%	22%		
Total individuals	30 (38%)	48 (61%)	1 (1%)	79
% of individuals answering (78)	38%	62%		
Total respondents	75 (51%)	61 (41%)	12 (8%)	148
% of all respondents answering (136)	55%	45%		

Q2. Do you agree or disagree that EPC Energy Efficiency Rating Band C is the appropriate standard to use?

	Agree	Disagree	Not Answered	Total
Organisations:				
Academic		2 (100%)		2
Building component manufacturers or services	4 (100%)			4
Community group	1 (33%)	2 (67%)		3
Energy-related private sector	6 (50%)	1 (8%)	5 (42%)	12
Local authority or interagency partnership	8 (80%)	2 (20%)		10
Anonymous organisation	1 (100%)			1
Private landlord or property management	1 (100%)			1
Professional or representative body	9 (38%)	12 (50%)	3 (13%)	24
Public sector or body – other	2 (100%)			2
Scottish Government delivery partner	2 (100%)			2
Third sector	6 (75%)	2 (25%)		8
Total organisations	40 (58%)	21 (30%)	8 (12%)	69
% of organisations answering (61)	66%	34%		

	Agree	Disagree	Not Answered	Total
Total individuals	24 (30%)	53 (67%)	2 (3%)	79
% of individuals answering (77)	31%	69%		
Total respondents	64 (43%)	74 (50%)	10 (7%)	148
% of respondents answering (138)	46%	54%		

Q6. Do you agree or disagree that 2024 is the right start date for the mandatory standard to start operating?

	Agree	Disagree	Not Answered	Total
Organisations:				
Academic	1 (50%)		1 (50%)	2
Building component manufacturers or services	3 (75%)	1 (25%)		4
Community group	1 (33%)	1 (33%)	1 (33%)	3
Energy-related private sector	5 (42%)	3 (25%)	4 (33%)	12
Local authority or interagency partnership	6 (60%)	2 (20%)	2 (20%)	10
Anonymous organisation	1 (100%)			1
Private landlord or property management	1 (100%)			1
Professional or representative body	7 (29%)	11 (46%)	6 (25%)	24
Public sector or body – other	1 (50%)		1 (50%)	2
Scottish Government delivery partner	1 (50%)		1 (50%)	2
Third sector	4 (50%)	3 (38%)	1 (12%)	8
Total organisations	31 (45%)	21 (30%)	17 (25%)	69
% of organisations answering (52)	60%	40%		
Total individuals	17 (22%)	58 (73%)	4 (5%)	79
% of individuals answering (75)	23%	77%		
Total respondents	48 (32%)	79 (53%)	21 (14%)	148
% of all respondents answering (127)	38%	62%		

Q7. Do you agree or disagree with point of sale as an appropriate trigger point for a property to meet the legally-binding standard?

	Agree	Disagree	Not Answered	Total
Organisations:				
Academic	1 (50%)		1 (50%)	2
Building component manufacturers or services	4 (100%)			4
Community group	2 (67%)		1 (33%)	3
Energy-related private sector	8 (67%)		4 (33%)	12
Local authority or interagency partnership	8 (80%)		2 (20%)	10
Anonymous organisation			1 (100%)	1
Private landlord or property management	1 (100%)			1
Professional or representative body	11 (46%)	7 (29%)	6 (25%)	24
Public sector or body – other	1 (50%)		1 (50%)	2
Scottish Government delivery partner	2 (100%)			2
Third sector	5 (63%)	1 (12%)	2 (25%)	8

	Agree	Disagree	Not Answered	Total
Total organisations	43 (62%)	8 (12%)	18 (26%)	69
% of organisations answering (51)	84%	16%		
Total individuals	30 (38%)	48 (61%)	1 (1%)	79
% of individuals answering (78)	38%	62%		
Total respondents	73 (49%)	56 (38%)	19 (13%)	148
% of all respondents answering (129)	57%	43%		

Q8. Do you agree or disagree that responsibility for meeting the standard should pass to the buyer if the standard is not already met at point of sale, as described above?

	Agree	Disagree	Not Answered	Total
Organisations:				
Academic	2 (100%)			2
Building component manufacturers or services	4 (100%)			4
Community group	2 (67%)		1 (33%)	3
Energy-related private sector	6 (50%)	1 (8%)	5 (42%)	12
Local authority or interagency partnership	7 (70%)		3 (30%)	10
Anonymous organisation			1 (100%)	1
Private landlord or property management	1 (100%)			1
Professional or representative body	9 (38%)	7 (29%)	8 (33%)	24
Public sector or body – other			2 (100%)	2
Scottish Government delivery partner	2 (100%)			2
Third sector	5 (63%)	1 (12%)	2 (25%)	8
Total organisations	38 (55%)	9 (13%)	22 (32%)	69
% of organisations answering (47)	81%	19%		
Total individuals	40 (51%)	34 (43%)	5 (6%)	79
% of individuals answering (74)	54%	46%		
Total respondents	78 (53%)	43 (29%)	27 (18%)	148
% of all respondents answering (121)	64%	36%		

Q10. Do you agree or disagree with point of major renovation as an appropriate trigger point for a property to meet the legally-binding standard?

	Agree	Disagree	Not Answered	Total
Organisations:				
Academic	2 (100%)			2
Building component manufacturers or services	2 (50%)	1 (25%)	1 (25%)	4
Community group	2 (67%)		1 (33%)	3
Energy-related private sector	8 (67%)	1 (8%)	3 (25%)	12
Local authority or interagency partnership	9 (90%)		1 (10%)	10
Anonymous organisation			1 (100%)	1
Private landlord or property management	1 (100%)			1
Professional or representative body	12 (50%)	3 (13%)	9 (38%)	24

	Agree	Disagree	Not Answered	Total
Public sector or body – other	1 (50%)		1 (50%)	2
Scottish Government delivery partner	2 (100%)			2
Third sector	7 (88%)		1 (12%)	8
Total organisations	46 (67%)	5 (7%)	18 (26%)	69
% of organisations answering (51)	90%	10%		
Total individuals	45 (57%)	31 (39%)	3 (4%)	79
% of individuals answering (76)	59%	41%		
Total respondents	91 (61%)	36 (24%)	21 (14%)	148
% of all respondents answering (127)	72%	28%		

Q20 Do you agree or disagree that, even if a property can't fully meet the standard, it should be required to get as close as possible to it?

	Agree	Disagree	Not Answered	Total
Organisations:				
Academic	1 (50%)		1 (50%)	2
Building component manufacturers or services	4 (100%)			4
Community group	2 (67%)		1 (33%)	3
Energy-related private sector	8 (67%)		4 (33%)	12
Local authority or interagency partnership	9 (90%)		1 (10%)	10
Anonymous organisation			1 (100%)	1
Private landlord or property management	1 (100%)			1
Professional or representative body	13 (54%)	4 (17%)	7 (29%)	24
Public sector or body – other	2 (100%)			2
Scottish Government delivery partner	2 (100%)			2
Third sector	6 (75%)		2 (25%)	8
Total organisations	48 (70%)	4 (6%)	17 (25%)	69
% of organisations answering (52)	92%	8%		
Total individuals	38 (48%)	33 (42%)	8 (10%)	79
% of individuals answering (71)	54%	46%		
Total respondents	86 (58%)	37 (25%)	25 (17%)	148
% of respondents answering (123)	70%	30%		

Q21 Do you agree or disagree that any exemptions or abeyances from the standard should be time-limited?

	Agree	Disagree	Not Answered	Total
Organisations:				
Academic			2 (100%)	2
Building component manufacturers or services	3 (75%)		1 (25%)	4
Community group	1 (33%)	1 (33%)	1 (33%)	3
Energy-related private sector	7 (58%)	1 (8%)	4 (33%)	12
Local authority or interagency partnership	7 (70%)	1 (10%)	2 (20%)	10
Anonymous organisation			1 (100%)	1

	Agree	Disagree	Not Answered	Total
Private landlord or property management	1 (100%)			1
Professional or representative body	9 (38%)	3 (12%)	12 (50%)	24
Public sector or body – other			2 (100%)	2
Scottish Government delivery partner	2 (100%)			2
Third sector	5 (63%)		3 (38%)	8
Total organisations	35 (51%)	6 (9%)	28 (41%)	69
% of organisations answering (41)	85%	15%		
Total individuals	29 (37%)	45 (57%)	5 (6%)	79
% of individuals answering (74)	39%	61%		
Total respondents	64 (43%)	51 (34%)	33 (22%)	148
% of all respondents answering (115)	56%	44%		

Q31 Do you agree or disagree that grant funding from the public purse should be focused on households who are vulnerable or in fuel poverty?

	Agree	Disagree	Not Answered	Total
Organisations:				
Academic	1 (50%)		1 (50%)	2
Building component manufacturers or services	4 (100%)			4
Community group	1 (33%)	2 (67%)		3
Energy-related private sector	6 (50%)	1 (8%)	5 (42%)	12
Local authority or interagency partnership	9 (90%)		1 (10%)	10
Anonymous organisation			1 (100%)	1
Private landlord or property management	1 (100%)			1
Professional or representative body	9 (38%)	3 (13%)	12 (50%)	24
Public sector or body – other	2 (100%)			2
Scottish Government delivery partner	2 (100%)			2
Third sector	6 (75%)	1 (13%)	1 (13%)	8
Total organisations	41 (59%)	7 (10%)	21 (30%)	69
% of organisations answering (48)	85%	15%		
Total individuals	32 (41%)	37 (47%)	10 (13%)	79
% of individuals answering (69)	46%	54%		
Total respondents	73 (49%)	44 (30%)	31 (21%)	148
% of all respondents answering (117)	62%	38%		

How satisfied were you with this consultation?

	Very satisfied	Slightly satisfied	Neither satisfied nor dissatisfied	Slightly dissatisfied	Very dissatisfied	Not answered	Total
Organisations:							
Academic		1 (50%)			1 (50%)		2
Building component manufacturers or services	1 (25%)	2 (50%)				1 (25%)	4
Community group	1 (33%)	1 (33%)			1 (33%)		3
Energy-related private sector	1 (8%)	2 (17%)	1 (8%)	1 (8%)		7 (58%)	12
Local authority or interagency partnership	4 (40%)	3 (30%)		1 (10%)		2 (20%)	10
Anonymous organisation	1 (100%)						1
Private landlord or property management	1 (100%)						1
Professional or representative body	2 (8%)		7 (29%)	1 (4%)		14 (58%)	24
Public sector or body – other			1 (50%)			1 (50%)	2
Scottish Government delivery partner	2 (100%)						2
Third sector	2 (25%)	1 (13%)		2 (25%)		3 (38%)	8
Total organisations	15 (22%)	10 (14%)	9 (13%)	5 (7%)	2 (3%)	28 (41%)	69
% of organisations answering (41)	37%	24%	22%	12%	5%		
Total individuals	9 (11%)	14 (18%)	22 (28%)	11 (14%)	17 (22%)	6 (8%)	79
% of individuals answering (73)	12%	19%	30%	15%	23%		
Total respondents	24 (16%)	24 (16%)	31 (21%)	16 (11%)	19 (13%)	34 (23%)	148
% of all respondents answering (114)	21%	21%	27%	14%	17%		

How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?

	Very satisfied	Slightly satisfied	Neither satisfied nor dissatisfied	Slightly dissatisfied	Very dissatisfied	Not answered	Total
Organisations:							
Academic		1 (50%)		1 (50%)			2
Building component manufacturers or services		2 (50%)	1 (25%)			1 (25%)	4
Community group	1 (33%)	2 (67%)					3
Energy-related private sector	2 (17%)	1 (8%)	1 (8%)		1 (8%)	7 (58%)	12
Local authority or interagency partnership	4 (40%)	4 (40%)				2 (20%)	10
Anonymous organisation			1 (100%)				1
Private landlord or property management	1 (100%)						1

	Very satisfied	Slightly satisfied	Neither satisfied nor dissatisfied	Slightly dissatisfied	Very dissatisfied	Not answered	Total
Professional or representative body	3 (13%)	3 (13%)	4 (17%)	1 (4%)		13 (54%)	24
Public sector or body – other			1 (50%)			1 (50%)	2
Scottish Government delivery partner	2 (100%)						2
Third sector	2 (25%)		1 (13%)	2 (25%)		3 (38%)	8
Total organisations	15 (22%)	13 (19%)	9 (13%)	4 (6%)	1 (1%)	27 (39%)	69
% of organisations answering (42)	36%	31%	21%	10%	2%		
Total individuals	27 (34%)	14 (18%)	16 (20%)	6 (8%)	7 (9%)	9 (11%)	79
% of individuals answering (69)	39%	20%	23%	9%	10%		
Total respondents	42 (28%)	27 (18%)	25 (17%)	10 (7%)	8 (5%)	36 (24%)	148
% of all respondents answering (112)	38%	24%	22%	9%	7%		

Appendix 2: List of organisations that responded²¹

Academic
Heat and the City Team, University of Edinburgh
The Energy Poverty Research initiative
Building component manufacturers or services
Mineral Wool Insulation Manufacturers Association (MIMA)
Kingspan Insulation
Bosch Thermotechnology Ltd.
Energy-related private sector
EDF Energy
Flogas Britain Ltd
Elmhurst Energy
NIBE Energy Systems
The Energy Saving Store
Luths Services Ltd
Calor Gas Limited
Local authority or interagency partnership
Dundee City Council
Perth and Kinross Council
North Lanarkshire Council
Glasgow City Council
Comhairle nan Eilean Siar
Other - community group
Sustainable Cupar
Cults, Bieldside and Milltimber Community Council
Professional or representative body
Law Society of Scotland
Homes for Scotland
Construction Products Association
The Property Energy Professionals Association
Central Association of Agricultural Valuers (CAAV) & Scottish Agricultural Arbiters and Valuers Association (SAAVA)
Built Environment Forum Scotland
Insulation Manufacturers Association
The Association for Decentralised Energy
Scottish Ecological Design Association

²¹ Excluding organisations that requested their response was not published, and those that requested their response was published without their name.

Solar Trade Association
Chartered Institute of Housing Scotland
Public sector or body – other
Historic Environment Scotland
NHS Health Scotland
Scottish Government delivery partner
Energy Saving Trust
Third sector
Sustainability in Practice
Citizens Advice Scotland
Existing Homes Alliance Scotland
The Wise Group
Tighean Innse Gall

Appendix 3: List of references to additional materials (academic research, reports, weblinks) provided in consultation responses

<p>Baker, KJ, Mould, R, Dalzell, C, McAlpine, R, & Shafi, J (June 2019), Carbon-free, Poverty-free: Heating options for rural Scotland. Policy paper for Calor by Common Weal, Glasgow Caledonian University, and the Energy Poverty Research initiative. Available at: https://commonweal.scot/policy-library/carbon-free-poverty-free</p>
<p>Currie & Brown and AECOM report to the Committee on Climate Change, The costs and benefits of tighter standards for new buildings Available at: https://www.theccc.org.uk/publication/the-costs-and-benefits-of-tighter-standards-for-new-buildings-currie-brown-and-aecom/</p>
<p>Cuthbert, I (2019), Quality Assurance Short Life Working Group Recommendations Report Available at: https://www.gov.scot/publications/quality-assurance-short-life-working-group-report/</p>
<p>Each Home Counts review Available at: https://www.gov.uk/government/publications/each-home-counts-review-of-consumer-advice-protection-standards-and-enforcement-for-energy-efficiency-and-renewable-energy</p>
<p>Energy Efficient Scotland (June 2019), Consultation Response from the Energy Poverty Research Initiative and Common Weal Available at: https://commonweal.scot/index.php/policy-library/energy-efficient-scotland-consultation</p>
<p>European Solar Shading Organisation (2016), Overheating risk in low energy buildings to combat Available at: http://www.es-so.com/images/downloads/Downloads%20publications/20_December_2016.pdf</p>
<p>European Solar Shading Organisation (2018), Implementing the amended EPBD needs a proper assessment of windows Available at: http://www.es-so.com/images/downloads/Papers%20downloads/Word_document_EPBD_Position_Paper_2018.pdf</p>
<p>Fawcett, T and Killip, G (2014), Anatomy of low carbon retrofits: evidence from owner-occupied Superhomes. Building Research & Information, 42(4), 477-488</p>
<p>Historic Environment Policy for Scotland (HEPS) Available at: https://www.historicenvironment.scot/advice-and-support/planning-and-guidance/historic-environment-policy-for-scotland-heps/</p>
<p>Jenkins, DP, Simpson, SA, and Peacock, A (2017), Investigating the consistency and quality of EPC ratings and assessments. Energy. 138: 480-489</p>

<p>Kerr, N and Winskel, M (2018), Private household investment in home energy retrofit: reviewing the evidence and designing effective public policy. ClimateXChange. Available at: https://www.climateexchange.org.uk/media/3146/cxc-epe-evidence-review-full-report.pdf</p>
<p>Maby, C and Owen, A (2015), Installer Power Available at: www.ukace.org/wp-content/uploads/2015/12/Installer-Power-report-2015.pdf</p>
<p>Mallaband, B, Haines, V and Mitchell, V (2013), Barriers to domestic retrofit: learning from past home improvement experiences. In: Swan, W and Brown, P (eds), Retrofitting the Built Environment, Chichester, Wiley Blackwell, 184-199</p>
<p>NIBE Energy Systems, Heating Our Homes – Phasing out Fossil Fuels: A Policy Pathway to Developing a Viable Heat Pump Market Available at: https://www.nibe.eu/en-gb/about-nibe/news/2019/2019-01-16-heating-our-homes---a-policy-pathway-to-developing-a-viable-heat-pump-market</p>
<p>PAS 2030 and 2035</p>
<p>Passivhaus (2020), Research Report - EPCs as efficiency targets Available at: https://www.passivhaustrust.org.uk/guidance_detail.php?gld=44</p>
<p>Sustainable Energy Association, Able to Pay report Available at: https://www.sustainableenergyassociation.com/resources/energy-efficiency-policy-pathway/</p>
<p>Sustainable Energy Association, Policy Key Issues Paper Available at: https://www.sustainableenergyassociation.com/resources/sea-policy-key-issues-paper/</p>
<p>UK Government, Help to Buy ISA Factsheet Available at: https://www.gov.uk/government/publications/help-to-buy-isa-factsheet</p>



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