

Response ID ANON-38C3-G8DY-W

Submitted to **Energy Efficient Scotland: Improving energy efficiency in owner occupied homes**

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Part 1 - Setting the energy efficiency standard for owner-occupied housing

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

Disagree

Please explain your view.:

To make such a measure legally binding would be out of proportion with current levels of control over private buildings and property. For example, 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.

The ability to meet this proposed standard would be unfairly felt by different property owners and areas. An important consideration is that the proposed standard if based on the current EPC does not accurately reflect the energy use of the occupants. A property owner may be penalised for having an assumed poorer energy-efficient home, but in fact uses less energy.

Our understanding is that energy loss through building fabric accounts for only a small proportion of the energy usage within a building, around 16%, for example. External factors such as exposure to high winds, altitude and local shelter have a major impact on building performance, as does house-type eg terraced/semi-detached/detached.

2 Do you agree or disagree that EPC Energy Efficiency Rating band C is the appropriate standard to use?

Disagree

Please explain your view.:

The RIAS would argue that private homes should be less onerously measured than those which are put up for commercial letting and that any solution considers suitable lead in periods.

While the aspiration is consistent with government policy the RIAS would however emphasise that there are many buildings currently assessed as not able to achieve a band C. These homes should not be condemned to obsolescence and future potential demolition. A building may be able to achieve an EPC band D and have 200 years of use left, not to speak of the embodied energy its many years of service may already have demonstrated. To potentially remove this stock from the housing available, and ultimately make it liable to be demolished, due to EPC rating/rating potential and replace it with buildings of a far shorter design life (of 30/40 years) is a strategy flawed from both a financial and carbon perspective.

An aspiration to achieve band C will need appropriate exemptions, therefore, to be workable. The government should also consider that owner occupiers make choices and fuel poverty issues do not drive all decisions made in relation to privately owned housing stock. The RIAS would also suggest that parallel to the proposed EPC Energy Efficiency Rating band C there be a clear revisiting of how current building stock is assessed in relation to EPC standards and their application in relation to pre-existing homes. Building performance can be a matter of the state of the building fabric and whether it has been properly maintained.

Annex A is clear about the potential concerns around current Standard Assessment Procedure (SAP) methodology in relation to renewable energy and low carbon heating sources. There is even discussion around SAP changing in relation to these factors. However, this annex does not include the well-known concerns around building assessment in relation to the EPC. There is a wider issue in the need to examine SAP in relation to revising values and archetypes for traditionally built buildings, for example related to solid walls, and other measures which can be taken in relation to window shutters, chimney balloon, curtains etc. These are currently not taken into consideration as they can be removed. Just as low-energy light bulbs can be taken into consideration so should heavy curtains which can do much to control draughts and reduce heat loss.

The RIAS advocates that the Standard Assessment Procedure (SAP) methodology cannot substitute for a design approach to building improvements. In developing any methodology which is hard coded into SAP may lead to inappropriate interventions which harm the building fabric or historic value of traditional buildings

If changes can be suggested in relation to new technologies, it would only be fitting to suggest changes in relation to traditional measures too.

3 What are your views on the "fabric first" approach?

Please explain your view.:

The RIAS is hugely supportive of this approach. Without a well-maintained, wind and water-tight home other 'improvements' are inefficient, uneconomical, and will give results far below the expected outcomes.

The fabric first approach should not however:

- impact on those characteristics which are of historical importance
- create long term problems that lead to building defects in the future; and
- the materials used must be low in toxic content and embodied energy / emissions.

The RIAS has been represented on the Cross Party Group on Tenement Maintenance; current recommendations from the group have been directed by the Scottish Government to the Scottish Law Commission. Enabling maintenance for tenemental properties will assist with the drive for better energy efficiency. More

information on the recommendations, and the work of the Group, is available through the BEFS website:
<https://www.befs.org.uk/policy-topics/buildings-maintenance-2/>

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

Please explain your view.:

Only if EPCs are being accurately assessed and accurately applied to all building types (including pre1919 traditionally built properties) will any level of compliance be appropriately known. This application will need a degree of appropriate skilling for assessors and the audit bodies involved. Unfortunately the current EPC methodology is not reliable for existing buildings as it makes many assumptions about building performance and occupant behaviour. This must be recognised.

The National Calculation Methodology (SAP) Energy Efficiency Ratings are calculated using a complicated algorithm, not a complex simulation. SAP is no more than a ready reckoner and is poorly calibrated against a very narrow data set from the 1970's. It was used initially to create its origin – BREDEM.

The Energy Efficiency Rating on an EPC is an indication of the cost of energy supplied to meet the regulated needs of a dwelling (based on assumed occupancy patterns). It is not an indicator of either the energy efficiency of the dwelling nor the green house gas (GHG) emissions associated with the dwelling.

Under the current SAP assessment a gas heated dwelling will have a better Energy Efficiency Rating than an electrical heated dwelling (unless there is a heat pump involved). Not because of the emissions nor because of the amount of energy it uses (that will be broadly the same, as energy is just energy, in fact the electrically heated dwelling could well use less as electricity is 100% efficient at the point of use if you have convector heaters and instantaneous hot water heaters), but because gas is cheaper (in SAP) it delivers a better Energy Efficiency Rating.

It is important to point out that many properties in rural and remote areas do not have access to mains gas and will therefore be required to adopt more expensive alternative technologies in order to comply with a universally applied standard. This is an unfair and discriminatory cost burden on rural communities, where household incomes and property values are generally lower.

The indices in the current SAP2012 methodology are out of date. For example, the SAP Methodology has an emissions multiplier for electricity of 0.512 KgCO₂(e)/Kwh. The latest data for the UK shows that this is currently 0.256 KgCO₂(e)/Kwh, but Scotland is only 0.024 KgCO₂(e)/Kwh.

Assuming you have been able to insulate a loft and install double glazing (not always options) the SAP Methodology will steer you in one of the following directions in order to achieve a low Energy Rating:

- Biomass heating
- Gas, oil or LPG boiler plus a few PV panels rising in number across the fuels
- Some form of heat pump
- Electric heating plus lots of PV panels

Each of these solutions are likely to be perceived as more achievable and have a lower cost, than trying to insulate solid walls, or below a suspended ground floor, or over a flat roof.

If a homeowner has not already decided to do them for their own benefit, the proposals on the table are a dis-incentive to homeowners from doing them.

The 'easy' solutions to get to a C rating may tend to steer home owners towards PV panels.

A PV panel manufactured in Scotland and optimally orientated, might pay back its embodied energy in around 5 years, however 2/3rds of the worlds PV panels are manufacturer in China, where the electricity grid has a footprint of 0.753 KgCO₂(e)/Kwh (according to rough calculations).

If you multiply this by the emissions factors for China you get a carbon payback of 145 years.

If the objective to tackle actual climate change rather than a notional idea of climate change, it is necessary to consider the whole life cost of products which may be manufactured in a wide range of countries.

Now other energy sources might be used in the manufacture, which might change the payback, but it will still be of this sort of order. So, the net impact of installing PV panels in Scotland is to increase climate change, because they cannot function long enough to payback their embodied emissions

The work which needs to be supported is proper maintenance, the careful addition of products including timber fibre, sheeps' wool, hemp type insulation, window upgrades or timber double glazed replacement – if historically acceptable are suitable options. All of this requires a design intervention where Architects can really add value to the consumer, delivering warm comfortable, low energy, affordable improvements.

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

Please explain your view.:

It is best practice to always have the ability to review at regular intervals. The RIAS's concern is that the document suggests that the Government could find itself starting with a flawed EPC in relation to a number of issues and including potential measures towards net zero carbon in line with its own policy. We would support a review of the EPC prior to any adoption. We would urge the Government to start on the right footing. For example within only the last 10 years a drive for low –carbon fuels such as biomass has been encouraged and funded by the Government, but now with a move to zero-carbon, these technologies may be penalised; conversely there will be no motivation to move from Mains Gas on the current EPC.

We are concerned that such messages are confusing for the general public in what is an area unfamiliar to most.

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

Disagree

Please explain your view.:

We would prefer an approach which seeks improvement rather than 100% compliance and support evidence based and technological review.

Additional data could be gathered/research projects commissioned about non-traditional and traditionally built housing stock which can then inform and enhance the understanding of the EPC rating assessment system. Technological developments are a positive and necessary step but emphasis also needs to be placed on human behaviour, including owner education.

As well as 'new' technology, traditional building methods and forms of energy efficiency should also be considered when assessing appropriate methods to enhance/upgrade/improve the EPC ratings for traditionally built properties. Air quality, condensation, mould growth and damage to building fabric are also issues and should be part of a review process and should be regarded as more important than EPC bands achieved, not an adjunct to this.

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

Not Answered

Please explain your view.:

With regard to the caveats above in relation to the setting of the legally binding standard, the point of sale appears to be an appropriate trigger.

However, whilst many technological developments and interventions have standardised outcomes, much energy use is based on behaviours/owner usage not just energy efficiency. Different owners may require different interventions to better suit their way of living (numbers/age of residents). How this is taken into account at sale may make any interventions more suited to being taken-on by the buyer, rather than the seller.

This also avoids the scenario where, as a seller, there is not the incentive to make high-quality, building-appropriate interventions when the cheapest 'solutions' may theoretically meet the EPC C rating standards.

There is a real danger that the proposed legislation will dis-incentivise those who could downsize from doing so, either as they will have to spend to improve or take a value penalty for not having done so

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?

Not Answered

Please explain your views and give any evidence you have, whether you agree or disagree.:

Buyers regularly take on liabilities in relation to building condition. This would, as is stated in the paper, be a commercial transaction agreed through conveyancing.

The time-limit suggested of 12 months may be challenging to meet depending on what skills are necessary to raise the EPC appropriately. People acquire properties and improve them in phases. 5 years from purchase may be a more practical time-limit.

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.

Please explain your view.:

Any additional liabilities and related costs may be seen to continue to privilege those able to afford the property and the related liabilities.

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?

Not Answered

Please explain your view.:

As defined below. There seems to be no reason to not include this as an additional trigger point.

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?

Please explain your view.:

There is an underlying presumption within the EP Buildings Directive that property values will correspond to both the size of a property and ability to pay.

A definition that is based on property values will be inherently problematic in Scotland where there is a very wide range in property values and where these do not correspond to property size. For example;

- Those that possess valuable properties in desirable locations will be in the advantageous position of being able to carry out an extensive range of alterations to their properties, without every reach the threshold of 25% of their property values.

- Those that live in less desirable locations and live in smaller properties, are likely to run up against this threshold almost immediately for any alterations that they wish to carry out.

12 How could a requirement to meet the energy efficiency standard at point of major renovation be checked and enforced?

Please explain your view.:

Without the need for a building warrant it would be extremely difficult for this to be assessed and enforced. For a major renovation the local planning authority and building standards team would seem to be where the burden was most likely to fall. These teams would need to be appropriately resourced. Compliance would need to be evidenced at second point of sale. Work on a major scale will require a building warrant.

Please explain your view.:

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?

Please explain your view.:

The RIAS would support in Incentivisation that could be centrally controlled and applied based on set criteria. Penalties rely on those ensuring compliance being resourced to enforce, which could prove problematic. As explained above we would prefer to see people educated and encouraged to undertake appropriate improvements.

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

Please explain your view.:

No response given

15 At what level, approximately, should any penalty be set?

Please explain your view.:

No response given

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

Please explain your view.:

Older owner occupiers, particularly those making major renovations to enable them to stay in their own home during a period of disability. The additional costs may be prohibitive.

Owner occupiers with low income, but perhaps an older, larger property in need of greater measures to meet the required EPC levels, but without the means to make such changes prior to sale.

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?

Please explain your view.:

No response given

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?

Please explain your view.:

Should a different approach to cost-effectiveness be taken with owner-occupied homes and those home owned by landlords? Any deviation would be difficult to assess, especially as on sale some homes would move between the two tenures. Deviation would also be difficult for communication from businesses and installers involved in up-grading properties to meet EPC ratings. There are challenges to all the approaches mentioned, particularly the pay-back tests where expectation and reality are not always aligned. Whilst a crude instrument, a cost-cap (taking into account a package of works) seems likely to be the easiest approach to communicate and assess.

Annex D focuses on the additional benefits to society of lower carbon emissions but fails to take into account the whole life cost of retrofitting measures. The damage to the environment and carbon emissions arising from material extraction, processing, production, transportation, installation, removal and disposal for many retrofit measures can far outweigh any benefits in use. This is particularly the case for technology driven solutions which have short lifespans and use highly toxic materials. This needs to be factored into the assessment.

Within the process outlined in the consultation there are several potential points to note.

- problems associated with the assessment methodology in question 4.
- concerns of other national bodies that have expertise in the field of protecting and conserving traditional stone and historic properties in Question 19.
- the potential conflicts with the requirement to comply with other legislation that applies to the design and construction process under question 28.
- Construction costs vary from one location to another across Scotland.

It must be anticipated that differences of opinion are going to arise regarding any assessment of what is technically feasible and what is cost effective.

As the process outlined is intended to involve legal compulsion, it is highly likely that there will be a legal requirement to provide an Appeals process to resolve these conflicts.

Clarity on how this appeals process might be established and operate are essential.

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.)

Please explain your view.:

We have highlighted the potential conflicts with the requirement to comply with other legislation that applies to the design and construction process under question 28.

With regard to the issue of cost-effectiveness, the RIAS agrees with BEFS and reiterates HES' response previously given to the EES 2018 Consultation:

A definition of cost effective as one which pays for itself in the lifetime of the measure makes sense. However, this requires accurate data on the expected lifetime of a measure which is produced independently of material manufacturers. If this is to be the measure of whether an energy efficiency measure is to be considered cost effective fresh independent analysis of the payback times will be required. It is worth noting that if this is the definition of a cost effective measure double glazing is unlikely to be included in applicable measures. There is no question in the consultation regarding the technical feasibility of measures. The proposal states that "a new assessment, building on the EPC process, should be developed to identify what is technically feasible". Whilst this is certainly to be welcomed, the question here is who will develop this assessment and who will undertake it? Current EPC assessors are not on the whole qualified to carry out such a detailed technical feasibility assessment. Considerable training will be required if this commitment is to be met with input from specialists in a wide range of measures and building types.

As mentioned previously, the current EPC assessments and ratings do not appreciate the variation and fabric types of pre1919 buildings of numerous kinds. EPC ratings do not, at present, accurately rate many traditionally built properties. Assessment and adaptation measures are not currently widely understood and the skills are not yet universally present to adapt appropriately. These factors make the cost of some adaptations for traditional buildings appear prohibitive. Until these factors are address adequately too many properties could be considered for demolition needlessly. The embodied carbon also needs to be taken into account.

With regard to common parts of a property, such as tenemental properties, these are not currently part of the home report in relation to the EPC Rating – is this to change?

In relation to improving the situation for home-owners with communal parts to their properties, the RIAS has been represented on the Cross Party Group on Tenement Maintenance, which has been working with the Scottish Government on measures to improve this situation.

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?

Not Answered

Please explain your view.:

Where consistent assessment could take place, and adequate exemptions were made in regard to some categories of listed buildings, on a case by case basis, the RIAS believes all homes should be well maintained, and as energy efficient as is possible for the building type. Taking into account resident health, building health, and appropriate measures of cost-effective interventions suitable to building type.

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

Not Answered

Please explain your view.:

This depends on why the exemptions or abeyances were made. For a very limited number of historic buildings any intervention may not be appropriate. But, as technology changes exemptions and abeyances may need to be reconsidered.

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?

Please explain your view.:

Local authority planning, building control and organisations with a national mandate for the built environment, such as Historic Environment Scotland, should all play a part in these decisions depending on building type and the interventions being considered.

Part 2 - Helping homeowners to meet the energy efficiency standard

23 The Short Life Working Group (SLWG) on Assessment propose 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?

Please explain your view.:

Occupancy based assessment has a role in raising awareness of property owners and individuals understanding of the links between lifestyle and behaviour to energy use reduction.

However, they should remain optional. The interventions in the property will remain and hopefully continue to provide benefits to all future owners/residents regardless of their use patterns.

24 The SLWG on Assessment propose 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?

Please explain your view.:

As technology develops and our understanding of both energy use, and the embodied energy within our existing built environment grows, these conflicts may decrease.

Any conflicts existing should be explained clearly and the most current legislation abided by.

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?

Please explain your view.:

There is a considerable difference in role between that of an assessor and that of an advisor. An advisor would have to have a thorough understanding of the design and construction processes and all of the consequential legislation that controls these activities to be able to offer advice that was reliable.

This is particularly important where judgments must be made on what measures may be technically feasible and cost effective.

Skills: Adaptation measures and behaviours are clearly detailed within the document but the associated skills and training to enable the delivery of these adaptations are not present.

How alignment of skills and actions is to be made possible should be detailed, for adaptation of any kind to be successful the appropriate skills being available is paramount.

Appropriate legislation will need to be in place to ensure correct standards and building typology understanding are in place to protect consumers and our built environment from incorrect application or misapplication of technologies and techniques.

Scotland has substantial body of architects capable of delivering high quality design led services. Construction professionals with an understanding of the construction methodology of the building being assessed and a working knowledge of likely current and future building defects are required. A domestic energy assessor does not have the skill to identify what is appropriate technically in terms of alterations to and upgrading of existing buildings. In terms of older and historic properties there are many measures which will be inappropriate and potentially damaging and the guidance of an architect accredited in conservation will be required.

26 The SLWG on Assessment propose 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?

Please explain your view.:

Full fabric surveys and reports should be carried out ahead of any energy efficiency improvements, followed by fabric repairs ahead of any energy efficiency measures. 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.

To mitigate some concerns, assessors will need to rely on standardised data, collected and held nationally, to demonstrate appropriate comparators on which to base advice and costings indications.

Local costs for both energy and interventions can give a clearer indication to any owner of the realistic choices they can make.

Local could be standardised by Local Authority area – difficult for some larger areas, but will give a picture that at least includes the main challenges for that area – particularly if those challenges are geographic.

27 The SLWG on Assessment propose 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?

Please explain your view.:

Technical feasibility is an area where depending on building type and assessor skills and knowledge additional professional expertise may be required.

This could include (but is not limited to):

- conservation skills,
- architectural skills,
- archaeological skills,

- engineering skills and
- planning skills.

Whilst the interventions considered here are discussed in relation to a particular outcome (energy use reduction and meeting EPC C), the individual projects will be as unique as all projects related to buildings ever are – some will be standard, others will need greater input and expertise.

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?

Please explain your view.:

Home owners need to be protected from bad advice and bad execution of work.

It will be essential that advisors have appropriate expertise, knowledge of the entire design and construction process and sound cost advice.

In addition to compliance with any energy standards, any adaptation of existing buildings fabric will also be required to comply with a wide range of other legislation, for example;

- CDM Regulations governing health and safety
- Protection of wildlife
- Planning legislation
- Asbestos regulations
- Party and boundary wall legislation
- etc

This will require properly qualified professionals who carry professional indemnity insurance.

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

Please explain your view.:

The suggestions related to a 'quality mark' and expansion of the accreditation schemes and frameworks to become more robust as the market expands seem prudent suggestions. However, for any schemes to be effective these steps need to be in place before legally-binding energy compliance ratings are in place.

Without consumer protection and quality assurance in place – quality of advice as well as of building fabric intervention – it will be difficult to ensure owners are willing to comply with legislation.

Energy efficiency measures being mis-sold, and a miss-match between expected savings and reality, as well as changes to national schemes over the years (feed-in tariffs for PVs) has left many consumers with a sense of wariness.

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?

Please explain your view.:

Government purchase power for its own and related estates could do much to reduce the cost of many potential interventions and technologies. This purchase power, to reduce the cost-per-unit for all potential buyers would be a huge intervention in changing the marketplace. Incentives for early adopters with reduced costs could help to stimulate the market and provide trained installers with work initially.

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?

Not Answered

Please explain your view.:

No response given.

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

Please explain your view.:

No response given.

About you

What is your name?

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Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:
The Royal Incorporation of Architects in Scotland (RIAS)

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response only (without name)

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Please enter comments here.:

The Citizen Space platform itself is fine and easy to use. However, when responding on behalf of an organisation, we are required to circulate the questions for comments and observations. It would be much easier to do if an editable document was provided (such as Microsoft Word) to allow for this.