

Built Environment Forum Scotland (BEFS) is the umbrella body for organisations working in the built environment in Scotland. Drawing on extensive expertise in a membership-led forum, BEFS informs, debates and advocates on the strategic issues, opportunities and challenges facing Scotland's existing built environment. BEFS is a supporting member of the [Climate Heritage Network](#).

Other relevant consultation responses from BEFS can be seen below, as many issues overlap and demand associative consideration:

- [DOMESTIC ENERGY PERFORMANCE CERTIFICATES \(EPC\) REFORM: CONSULTATION \(6/10/2021\)](#)

BEFS strongly supports the drive to improve the energy performance of Scotland's homes, including traditionally built properties, and therefore welcomed this consultation on the proposal to reform the current Energy Performance Certificate (EPC) as part of the draft Heat in Buildings Strategy.

- [ENERGY EFFICIENT SCOTLAND: IMPROVING ENERGY EFFICIENCY IN OWNER OCCUPIED HOMES – CONSULTATION RESPONSE \(08/04/2020\)](#)

BEFS response focuses on: well-maintained buildings being the first step to safer, warmer homes; the EPC ratings being assessed and applied accurately for building type; and adaptations being appropriate for the health of both the occupants and the building in question. Members' responses: [RIAS](#), [IHBC](#).

- [HOUSING TO 2040 – CONSULTATION RESPONSE \(27/02/2020\)](#)

BEFS is glad see the inclusion of maintenance in the Scottish Government's vision but emphasises concerns over a lack of connections across policy areas and highlights the continuing challenges of EPCs with regards to traditionally built properties.

- [ENERGY EFFICIENT SCOTLAND – CONSULTATION RESPONSE \(17/06/19\)](#)

BEFS responded to the EES consultation highlighting the importance of accurate EPC ratings for all buildings, the time needed for the skills-supply chain to be in place, and the necessity for education around behaviour change, as well as mandatory adaptations, to truly enable holistic, substantial and significant change.

BEFS will be responding only to relevant questions of the consultation, as below:

Domestic Energy Performance Certificate Metric Reform Proposals

1. Do you agree with the set of metrics that we propose to display on the reformed EPC?

Yes

BEFS broadly agrees with the metrics proposed and supports the drive to improve the energy performance of Scotland's homes, including traditionally built properties. The inefficiencies of the EPC in relation to traditional buildings has been raised previously and BEFS would reiterate that the existing built environment is the most sustainable building resource we have, through the embodied energy present, and the potential for adaptation and reuse. Assessed appropriately our existing built environment presents an enormous

opportunity to provide climate solutions, as traditional properties form a fifth of Scotland's overall housing stock. As such we are pleased to see greater consideration given to fabric within the proposals but would agree with and support comments made by the National Trust for Scotland that *'ultimately the performance of building fabric is linked to building condition.'* It would be hoped that inclusion of Fabric Rating could and should positively contribute to a fabric first and maintenance approach to Scotland's buildings.

Further to this, BEFS has frequently lobbied for skilled, green employment in relation to this work, in line with the Scottish Government's Heat in Buildings Strategy, and notes the potential for unintended consequences of recommended improvement measures - many of which occur due to traditionally constructed buildings not being accurately assessed (and therefore not receiving appropriate interventions) within the current EPC assessment process.

2. Are there additional metrics that you think should be included on the EPC, or metrics that you do not think should be included?

BEFS considers that any changes to the EPC should reflect the embodied carbon inherent in existing and historic properties. Additionally, we consider that as traditionally constructed buildings and modern constructed properties differ in how they function, a more nuanced approach should be incorporated into any plans to change EPCs.

We further support the point made by the NTS that *'We would encourage there to be a place for building condition noted within ongoing EPC reform to ensure energy efficiency and fabric condition do not become topics that become disconnected'*.

3. Considering our proposal to include a Fabric Rating on EPCs, do you think this metric should include domestic hot water heat demand?

BEFS would like to reiterate support for the inclusion of a Fabric Rating on EPCs, and would in principle support the inclusion of hot water heart demand, whilst noting the broader concern raised within the paper that these services may have a shorter lifespan that the rest of the building's fabric, especially in traditionally constructed properties, which could detract from what would hopefully be a positive step towards a fabric first approach to maintaining buildings.

BEFS agrees with the statement in 4.1.3 that *'Fabric efficiency alone is not sufficient to reach net zero...'* however is concerned that the reforms through the proposals make no mention of the importance of repair and maintenance of fabric when outlining the key aspects of energy performance that it is crucial for homeowners to fully understand. Fabric efficiency can and does have a huge impact on the efficiency of all buildings, and the message must be that maintenance and repair – in particular of existing and traditionally constructed buildings – goes hand in hand with heating solutions. This, combined with the statement below that the methodology for assessment of building types will not change as part of this reform suggests a very real missed opportunity to harness and recognise the benefits of the existing and traditionally constructed built environment's full and actual contribution towards net zero.

Regarding the paper's statement that *'We propose to include information about the efficiency of the system on the EPC. We intend to classify systems depending on their efficiency, so that the benefits of more efficient systems are recognised. This would mean that zero direct emissions systems with particular energy efficiency*

features, such as modern storage heaters, receive recognition for those features over direct electric heaters. Additionally, systems with high efficiency, such as heat pumps, would also be recognised' - BEFS welcomes any moves towards clarity enabling owners to make informed energy efficiency decisions and would suggest that alongside this it would be possible to highlight other beneficial steps such as fabric first, repair and maintenance (alongside appropriate retrofit).

4. Do you have a view on the way that the Fabric Rating mapped against a scale, for example, how 'A' or 'G' rated performance is determined?

Any determination made should ensure accuracy of assessment for all buildings, including those traditionally constructed.

Within the consultation there is discussion of basing Band B on "typical new build fabric performance" – is this on assumed performance of materials with appropriate construction and quality assurance, or on actual performance once installed and with residents in place? At times there is a performance gap between the two.

5. Do you agree with our proposal to give more prominence to the energy efficiency features of the home (such as the depth of loft insulation)?

Yes, however we consider that as traditionally constructed buildings and modern constructed properties differ in how they function, a more nuanced approach – including appropriate guidance – should be incorporated into energy efficiency features of different types of buildings. BEFS considers that the assessor skills are a crucial part of what information is provided to building owners and/or occupiers, including identifying suitable materials and installation skills.

It is also of note, for example, that "depth" of insulation alone is not enough. Previous measures need to be correctly installed and maintained to give the expected level of benefit. Where possible, condition of measures already installed should be noted.

Non-Domestic Energy Performance Certificate Metric Reform Proposals

6. Do you agree with the set of metrics that we propose to display on non-domestic EPCs?

Not answered.

7. Are there any additional metrics that you think should be displayed, or any in the proposed set that should not be included?

BEFS would here note and reiterate the view of the NTS that *'Adopting a fabric first approach is essential when considering a buildings performance therefore the Trust believes the EPC should include a place for building condition to be noted. This will help ensure energy efficiency and fabric condition do not become disconnected topics and help owners be more informed of the condition of elements of their building and how poor condition relates to poor fabric performance.'*

EPC Purpose and Validity**8. Do you agree with us that the primary role of the EPC should be to provide basic energy efficiency information for the purpose of comparison and act as a prompt to consider retrofit options?**

Yes, broadly.

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However, BEFS considers that a key part of EPC reform will be the provision of clear guidance and information. This will be essential to negate the potential for unintended consequences of inappropriate or unnecessary retrofit interventions, when action towards overall energy efficiency performance of a building might be better served by repair and maintenance. It will be essential to clearly outline what wider options are available and suitable to building type – and BEFS would reiterate the importance of a fabric first approach *alongside* retrofit.

9. If you disagree, or have further comments about the role of the EPC, please provide your comments.

Not answered.

10. Do you agree that the validity period of EPCs should be reduced from 10 to five years?

BEFS agrees with the proposals to reduce the period of validity from 10 to 5 years, towards hopefully enabling more efficient assessment of existing buildings. We would however urge that as part of this the data collected is used to map and build a holistic understanding of the condition of Scotland's building stock. We would further reiterate the importance of assessor skills, especially with this proposed increased frequency of assessments, and caution that any increased costs attached to this do not sit with those least able to afford them (and in turn, prohibit full willingness to comply).

11. We welcome any views on the usefulness of our proposals for other relevant policy areas, such as fuel poverty or the delivery of government schemes. Please provide any comments you wish to share.

Must align to:

The Scottish Parliamentary Working Group on Tenement Maintenance to ensure synergy of effort.

<https://www.befs.org.uk/policy-topics/buildings-maintenance-2/>

Digital and Accessible EPC Format and Content**12. Do you agree with our proposal that EPCs should move from PDF to webpage format?**

Yes

Energy Performance Certificate Reform - Consultation

16/October/2023

BEFS supports any move towards making EPCs more accessible and for associated data to be collected and utilised. BEFS advocacy for existing building data has been extensive, and all moves to understand more about our buildings including their condition, operation and safety is to be supported.

BEFS also notes the recent work seen here at Cad Corp, <https://www.cadcorp.com/cadcorp-launches-new-epc-data-service/> and questions what links are being made by the Scottish Government to work with other data providers/users.

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It is mentioned in the consultation that moving to a webpage format also offers “potential future data linkage opportunities, such as the potential to integrate data based on metered energy use.” BEFS notes that this data will already be held by energy providers, and would query what work is ongoing to ensure greater connection with national scale data holders to complete these pieces of work with least duplication of effort and resource?

13. Do you agree with our proposal to improve signposting to further support and advice schemes on the EPC?

Yes

BEFS welcomes this proposal and would be keen to support with identifying further support and advice relevant to the existing and historic environment – pertinent to EPCS – when the opportunity arises.

BEFS would recommend Scottish Government continue to liaise with Historic Environment Scotland and include links to the appropriate Managing Change guidance.

Additional signposting is to be supported but clarity as to where is this information coming from, and who is checking the quality of the information provided would be welcomed – particularly in relation to retrofit products and materials, their suitability for property types, and the installer skills and availability.

14. Do you agree historical EPCs should be publicly accessible on the EPC register (while clearly marked as historic)?

Yes

All historic data provides a positive and vital contribution to understanding the condition and energy efficiency of Scotland’s buildings.

BEFS also notes the recent work seen here at Cad Corp, <https://www.cadcorp.com/cadcorp-launches-new-epc-data-service/> and questions what links are being made by the Scottish Government to work with other data providers/users to provide greater access to building data?

15. Do you agree that the EPC register should be accessible by API?

Yes

This step is essential as part of the formation of holistic, integrated, building data.

16. Do you have any further comments on our proposals to move to a digital and accessible EPC?

BEFS highlights comments made by the NTS here, in that *'The Trust encourages this discussion to go beyond EPC to include building condition reports. This will allow owners to access better information relating to the 'service record' for their property. This is important as the two are inextricably linked and having access to such transparent information will allow tenants and owners to make better informed choices.'*

BEFS advocacy for the importance of information about the condition, materials, energy performance and ownership of our buildings – as holistic and integrated information has been long-standing. These proposals are an excellent part of this picture – but need to be considered more broadly. With better information we can act to make greater benefits to occupant health and safety – as well as take steps towards meeting net zero targets with greater ease.

EPC Auditing and Assurance

17. Do you agree with our proposals to review and update the auditing and assurance requirements for EPCs in Scotland?

Yes, however BEFS queries the state of the market currently and would want to understand current issues reported, and if the changes suggested within the review directly address any known issues.

18. Please detail any additional assurance activity that you think would be appropriate to enhance the accuracy and reliability of EPCs.

BEFS would like to take the opportunity to recognise that the topic of EPCs and their inefficiency across different building types has long been discussed, with the built environment sector contributing evidence and information – as noted in the paper.

BEFS recognises the importance of data to implement these changes and that holistic data about the condition and makeup of our traditional buildings must be available to enable the case for embodied carbon to be made.

We would as such refer to recent whole life assessment work undertaken by RICS: ['RICS Whole life carbon assessment \(WLCA\) for the built environment'](#) and look forward to contributing to further work in this area to ensure that EPCs fully recognise and can take into account a building's (both dwellings and non-domestic) embodied carbon, as well as longer term sustainability, enabled by repair and maintenance.

Consultation Questions : Legislating for EPC Reform and Timeline

19. Do you have a view on our timeline for reform implementation?

Yes.

BEFS is appreciative of the quick timeline for this work, suggesting that much is underway, and that the importance of this topic is well understood. BEFS supports the intent that the work remains flexible in relation to SAP11 and EU changes. This timeline sets a great pace for other changes to be made at speed when necessary, in the future.

Energy Performance Certificate Reform - Consultation

16/October/2023

There are no questions in the consultation in relation to potential future reform, but BEFS would wish to note:

1. That 'Stakeholders have told us that the use of modelled data for EPCs is flawed in certain contexts.' – With better data there could be significantly better modelling.
2. The suggestion for future Green Building Passports is to be supported, but BEFS would strongly support that Building Passports (including 'Green' elements) would be more useful in the long run – concentrating efforts on the fabric of the building, and the retrofit – rather than focusing on one area specifically.

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BEFS responses to a number of Consultations in relation to the Built Environment can be found at:

<https://www.befs.org.uk/resources/consultations/>

RESPONDENT INFORMATION

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

I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy. **I CONSENT**