



## **SPF Submitted Response to EPC reform consultation**

### **Domestic Energy Performance Certificate Metric Reform Proposals**

Question 1 Do you agree with the set of metrics that we propose to display on the reformed Energy Performance Certificate?

Yes

Please provide further details here: We broadly agree with the set of metrics included to calculate the EPC, but we recognise that fabric rating should not essentially translate to increased insulation but also to the resilience of the building in terms of long-term climate and structural impact on the building. Healthy ventilation should be accounted for as well, avoiding internal humidity and chances of moulds. The previous EPC metric was focused on the running cost, it is worth noting that the unit price for gas and electricity should be equalised to promote the move away from fossil fuel-based heating systems.

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

Should be included, please give reasons for your views: The lifecycle impact should be included while calculating the EPCs as current EPC are calculated on the running cost hence to improve the rating the heating systems will be fossil fuel based as electricity is costly. The materials used and embodied carbon of a building should be accounted for to get the clearer picture of energy efficiency of the building, but this needs to be implemented to align with infrastructure and the building including boiler system age. For instance, if the boiler is less than 15 years old there should be exemptions, to avoid significant waste and avoid a media article on the reasons why we are creating boiler waste heaps not to mention the fact the carbon it has taken to make that equipment and the equipment that replaces this is beyond belief. Additionally, moving away from fossil fuel and adapting to air sourced heat pumps or connecting to heat network is costly, this should be incentivised.

Should not be included, please give reasons for your views:

Question 3 Considering our proposal to include a Fabric Rating on EPCs, do you think this metric should include domestic hot water heat demand? Don't know Should include, please give reasons for your views: Should not include, please give reasons for your views:

Question 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? Please provide further details here:

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We agree with the rating mapped from A – G and basing rating A should be an equivalent of Scottish Variant of Passivhaus standard in kWh/m2/ yr.

Question 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

Please provide further details here: We agree with the prominence to the energy efficiency features in the reformed EPC. This will be a helpful tool for the occupiers and future occupier to measure the energy efficiency and reflect the small improvements feasible, for instance depth of loft insulation, switch to electric boiler etc to be reflected, which is not currently captured.

Consultation Questions:

### **Non-Domestic Energy Performance Certificate Metric Reform Proposals**

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

Yes

Please explain your view further:

We agree. It is preferred that there is a policy alignment with the wider UK so that those managing property portfolios across the UK can make easier comparisons.

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

Should have additional metrics, please explain your view further:

It is important that the new metrics will inform and be complemented by reforms to existing Section 63 requirements. We await detailed proposals on the reform of S63, which is another reason for suggesting 2025 might be a better date for reformed EPC implementation than 2024.

Should not be included, please explain your view further:

Consultation Questions:

### **EPC Purpose and Validity**

Question 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

Please give details for your answer: The reform of EPCs is an important part of the drive for improving older properties and thus achieving the government's net zero carbon emissions goal.

Question 9 If you disagree, or have further comments about the role of the EPC, please provide your comments. Please give details for your answer:

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

Yes

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Please give details for your answer:

If an EPC is reduced to validity for five years, it will be important for assessments to remain affordable. It will be important for early notice for new build developers in particular, to be aware that their new build EPCs will have their period of validity halved.

Question 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.

Please give details for your answer:

We agree that the government's proposals should improve its evidence base for fuel poverty and energy demand from buildings.

Consultation Questions:

### **Digital and Accessible EPC Format and Content**

Question 12 Do you agree with our proposal that EPCs should move from PDF to webpage format?

Yes

Please provide further details here: We agree with the move way from PDF format as it will be more accessible and easier to update for assessors, it will be useful to archive information of previous occupants and improvements made to the property over the years as well.

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

Yes

Please provide further details here: We agree with signposting to further support and advice schemes on the EPCs as it will provide more certainty on upcoming information for property information in a single portal.

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

Yes

Please give reasons for your view: Yes, we agree with that historical data should be publicly accessible for occupier and buyer to assess the building improvements, it will also feed into providing evidence for SAP. Also, EPC plays a key role in standardisation, comparison and improvement of buildings, data is required to begin that, historical data to available on the EPC register will enable that.

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

Yes

Please give reasons for your view:

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

Please explain your view further:

We support the move to online data, but it must be holistically done for the whole building rather than owners, ideally linking the evidence of property improvement which will make it easier for assessors to access the build and review the records. For the non-domestic sector it will make it easier for landlords, asset managers and investors to track improvements as it is complicated to track the changes with often a wide range of previous owners.

Consultation Questions:

#### EPC Auditing and Assurance

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

Yes

Please explain your view further:

Question 18 Please detail any additional assurance activity that you think would be appropriate to enhance the accuracy and reliability of EPCs. Please give details for your answer:

We welcome the proposals to update the Operating Framework overseeing EPCs in Scotland. Given that the role of EPCs is central to understanding how the energy efficiency of our built environment will improve over these next critical 5-10 years, we would be keen for the government to confirm that there will be an ongoing technical review and update of the new EPCs. This will be increasingly important as new heat and energy systems come to be a more regular feature of our properties. The greater use of accessible web-based data will help to focus attention on the progress of improved energy efficiency in Scottish buildings. This should be complemented by regular scrutiny, to measure improvements made once the new EPCs and Heat in Buildings legislation is in place.

Consultation Questions:

#### Legislating for EPC Reform and Timeline

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

Yes

Please give details for your answer:

There are a range of policy and legislative changes now coming forward on the energy standards and performance of buildings. This is true across the UK but clearly in Scotland with changes to energy standards next year ahead of the UK, the Scottish Passivhaus variant and the anticipated Heat in Buildings regulations there is more impending reforms. We understand there are good reasons for looking to introduce the reformed EPCs as soon as possible following the appropriate parliamentary considerations and approvals are achieved. However, there is also the attraction of seeking to align reformed EPCs with SAP11 should that review be concluded timeously, as well as with the

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anticipated wider heat and Buildings regulations in Scotland. This suggests early 2025 may therefore be a better date for implementation of the reformed EPCs.

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