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# SPF Consultation Response

Heat and Energy  
Efficiency Technical  
Suitability Assessment  
(HEETSA) Scoping  
Consultation

Submitted 29 August 2025

## SCOTTISH PROPERTY FEDERATION

The Scottish Property Federation (SPF) is the voice for the real estate industry in Scotland. As a part of the wider British Property Federation, we include among our members: property investors, including major institutional pension and life funds; developers; landlords of commercial and residential property; and professional property consultants and advisers. Our members build Scotland's workplaces, homes, shops, schools and other facilities and the infrastructure that serves them. Our industry is therefore a core component of the Scottish economy.

## CONSULTATION SUMMARY

### Heat and Energy Efficiency Technical Suitability Assessment (HEETSA) Scoping Consultation

The Scottish Government has is consulting on HEETSA to provide an option of retrofit properties going a step beyond the standardised method of EPCs.

## OUR RESPONSE

In our response to the Scottish Government's consultation on the Heat and Energy Efficiency Technical Suitability Assessment (HEETSA), we express support for the principle of a government-led accreditation and approval framework to standardise retrofit assessments. Such a system is important to address buildings that are challenging to upgrade under MEES, including cases where landlords face obstacles in gaining permissions or where retrofit measures carry high costs.

Regarding the scope, HEETSA should encompass the full retrofit process from assessment through to installation standards, while also considering factors like occupancy. We emphasise that access to government-approved assessors must be made straightforward, with cost caps to ensure assessments are affordable and widely accessible.

We broadly agree with the methodologies proposed by the Scottish Government, aligned with standards such as BS 40104, PAS 2035 and PAS 2038, but stress that the approach should be holistic, reflecting whole-building energy consumption and long-term carbon impact, not isolated works. Also, to streamline the process and control costs, it should be feasible for a single, well-qualified assessor to complete a HEETSA, given they receive appropriate training and qualifications.

A gradual approach led by guidance to bring in HEETSA will allow the supply chain, training infrastructure, and professional standards to develop sufficiently. This cautious transition will reduce risks of capacity bottlenecks, increased costs, or delays and will provide a solid foundation for potential future regulation.

## Consultation Questions

### QUESTION 1

To what extent to you agree or disagree that it would be valuable for the Scottish Government to develop a HEETSA (a government-led approval and accreditation mechanism to provide oversight and standardisation of the retrofit assessment market)?

We agree with the concept of HEETSA guidance as there needs to be extra considerations for buildings that are harder to upgrade to MEES, landlords who cannot attain required permissions from neighbours, tenants or planning authorities, or where measures are significantly expensive.

The information should be readily available for approaching government approved accreditors. There should be a cost cap on these assessments to make them more accessible.

### QUESTION 2

Which delivery model do you think would be most appropriate for HEETSA?

Direct Government accreditation of assessors

Government accreditation of assessor organisations who in turn accredit assessors

HEETSA as guidance only without Government accreditation of assessors

Other – specify

This delivery model would offer a balanced approach to both scalability and consistency of standards. It also aligns well with a phased, guidance-led rollout of HEETSA as it would allow the market time to mature.

### QUESTION 3

What methodologies would be needed to meet the requirements of a HEETSA?

Please name existing methodologies that could be used and highlight any gaps that you think should be filled with new methodologies.

We broadly agree with the proposed methodology based on 'Improving home energy efficiency – retrofit assessment policy report' by Scottish Government in June 2025, with a close methodological approach to BS 40104, PAS 2035 and PAS 2038. We would also like to point out, the approach should be holistic and not isolated to a building, ensuring that long term energy consumption and level of carbon offset is also considered.

#### QUESTION 4

Which of the following statements comes closest to your view:

It is feasible for an individual assessor to have sufficient skills and knowledge to complete a HEETSA

A HEETSA would require input from multiple specialists and could not be completed by an individual

Don't know

Other - please specify

Please provide reasons for your view.

To reduce complexity, costs and pressure on resources, it should be feasible for a HEETSA to be completed by a single assessor, providing they have received robust training and the correct qualifications. Introducing more than one assessor may introduce delays and undoubtedly be more costly.

#### QUESTION 5

To what extent do you agree or disagree that non-personal data gathered through a HEETSA should be stored to form part of a 'building logbook' or 'green building passport'?

We agree that 'non-personal' data shall be gathered and reflected in 'building logbook', it is an important entity to reflect the status of Scotland's built environment.

#### QUESTION 6

To what extent do you agree or disagree that the HEETSA assessor should be required to be independent of the outcome of the assessment? E.g. they could not financially gain from the outcome if a measure is stated as technically suitable.

It would be inappropriate for assessors to financially gain from any form of outcome as it could compromise the integrity of the process and lead to biased recommendations which would be unfair and not in the interest of meeting technical and regulatory standards.

**QUESTION 7**

Thinking about the relationship between the EPC and HEETSA, which of the following statements comes closest to your view:

The results of a HEETSA should result in the production of a revised EPC as part of its output

✓

The results of a HEETSA should be made available to inform the production of a revised EPC and should be considered acceptable 'documentary evidence' to override default values.

The results of a HEETSA should not have any influence on the EPC and its ratings

Don't know

**QUESTION 8**

Thinking about presenting the results of a HEETSA, please give your view on:  
HEETSA should result in a standardised certificate or report?

Our members agree that if this detailed assessment is being undertaken by then it can be used to certify or being reflected in the home report.

**QUESTION 9**

Please provide details of any circumstances in which you think a HEETSA should be required, and the reasons for your view.

Similar to Q1

**QUESTION 10**

Do you think it is necessary to develop a legal basis for HEETSA (i.e. should HEETSA be underpinned by regulations in a similar manner to EPCs)?

No, not initially. The market will need significant time to adapt to HEETSA and if initially underpinned by regulations, there is a risk there will be insufficient skills, limited capacity and lack of appropriate tools which risks delaying or adding costs to projects.

A gradual transition led by guidance rather than regulation would allow the supply chain, training infrastructure, and professional standards to develop in parallel so a future legal framework could be developed. This could ensure a smoother implementation and potential for flexibility in the guidance in the future as the system matures.

-End of questions-

