

Consultation Title	<b>Energy Efficient Scotland</b>
Date	<b>17/06/19</b>
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Scottish Land & Estates is the voice of rural businesses throughout Scotland. We are a membership-based organisation representing a wide range of rural businesses, including farmers, foresters, tourism operators, housing providers, leisure companies, and renewable energy providers.

Our members provide a wide range of economic, environmental and social benefits which are vital to the success and survival of communities throughout rural Scotland. They play a critical role in ensuring sustainable, healthy and empowered rural communities, providing housing, employment and a wide range of economic, environmental and social benefits.

#### **Pace of Delivery, Impact of pace on supply chain, Impact on Fuel Poverty & Climate Change**

**With regards to achieving an accelerated delivery of the standards proposed, do you think mandatory action for owner occupiers would be required? Please provide a rationale for your answer.**

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**No.**

Particularly for detached properties, there is a concern that an owner-occupier should not be forced to meet a certain EPC standard. We are unclear as to how the standard will be enforced unless there is a change in ownership. There are concerns that this could push some householders into negative equity. Incentivisation such as through taxation and green mortgages would encourage upgrades without mandatory action.

**What trigger points, e.g. sale, renovation, etc. could be used to require owner occupiers to undertaken energy efficiency improvements?**

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We do not support mandatory action

**From a supply chain perspective, do you think bringing forward the timescales for the Programme would have a positive or negative effect on quality, skills & capacity and consumer protection?**

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**Negative**

There needs to be a suitable time to educate consumers and ensure that there are the necessary skills in the industry. It has already been identified that there is a lack of skilled contractors in rural or remote areas and therefore properties in these areas will not be able to meet timescales if they are brought forward.

**In your view, how would accelerating Energy Efficient Scotland help, and/or how would it hinder, plans to address fuel poverty?**

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Hinder - it is clear that improving energy efficiency and eradicating fuel poverty should be linked. However, the current energy efficiency targets are already going to be a sizeable challenge and we are still awaiting clarity on the regulations. While we support improving the overall energy efficiency of housing stock in Scotland and we support the Scottish Government's aim to eradicate fuel poverty we feel that the best way to guarantee success is by setting realistic targets.

**With regards to reducing the emissions associated with the supply of heat, what are your views on consideration of energy efficient improvements alongside changes to heating systems?**

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We feel it is appropriate to consider energy efficient improvements alongside changes to heating systems. Frequently recommendations made in EPC for rural properties are not appropriate and therefore feel it will become increasingly common for rural properties to focus on low carbon energy supplies rather than continuing to improve their current heating systems.

**Private Rented Sector**

**What are your views on using change of tenancy as a trigger to require the increased standard?**

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In the main, we feel that using the change of tenancy as a trigger to require the increased standard is a sensible suggestion, but more information needs to be published regarding the regulations surrounding energy efficiency standards.

**What are your views on using 1 April 2025 as the date to start applying the minimum standard of C when there is a change in tenancy?**

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We are supportive of improving the energy efficiency of housing stock across Scotland.

However, we are not satisfied with the accuracy of EPCs and feel they need to be improved to ensure any work recommended will not have a negative impact on the building or its occupants.

We are concerned that a number of properties will be unable to reach the minimum standard of C and this could have a negative impact on housing stock, particularly in rural areas.

**With regards to providing a useful tool to landlords planning and executing improvement works, what are your views on basing any cap of required works on a definition of cost-effectiveness and technical feasibility?**

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We are supportive of basing any cap of required works on a definition of cost-effectiveness and technical feasibility. As stated in a previous consultation response of an owner's cost cap or equivalent is reached a lower standard should be accepted. Ideally funding support should recognise where costs are highest and where energy efficiency benefits will be most acutely felt.

Similarly, we hope the EPC recommended works will be drastically improved to ensure they focus on the specifics of the property being assessed rather than a broad generalisation. This should mean that works which are inappropriate are not recommended.

**Impact on Supply chain: skills and capacity**

The Short Life Working Group have made recommendations which they believe represent the actions required to ensure that Energy Efficient Scotland will achieve consistently high levels of quality, health & safety and consumer protection. do you agree? If not, what more or less should be done?

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Yes

**What do you think the role of Scottish Government should be in ensuring the quality criteria are consistently met?**

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Putting in place the appropriate legislation and regulations