



## Consultation on funding of The Scottish Energy Performance Certificate Register

### RESPONDENT INFORMATION FORM

**Please Note** this form **must** be completed and returned with your response.

Are you responding as an individual or an organisation?

- Individual  
 Organisation

Full name or organisation's name

Homes for Scotland

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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  
 Publish response only (without name)  
 Do not publish response

#### Information for organisations:

The option 'Publish response only (without name)' is available for individual respondents only. If this option is selected, the organisation name will still be published.

If you choose the option 'Do not publish response', your organisation name may still be listed as having responded to the consultation in, for example, the analysis report.

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  
 No

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**HOMES FOR SCOTLAND RESPONSE TO THE  
CONSULTATION ON FUNDING OF THE SCOTTISH  
ENERGY PERFORMANCE CERTIFICATE REGISTER**

**19 JUNE 2017**

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## HOMES FOR SCOTLAND RESPONSE TO THE CONSULTATION ON FUNDING OF THE SCOTTISH ENERGY PERFORMANCE CERTIFICATE

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1. Homes for Scotland (HFS) is the representative body for the home building industry in Scotland, representing some 200 member organisations from home building, RSL, planning and architecture professions as well as supply chains who together help deliver around 95% of all new homes built for sale each year, including a significant proportion of affordable homes. HFS is committed to improving living in Scotland by providing this and future generations with warm, sustainable homes in places people want to live.
2. We welcome the opportunity to offer comment on the Consultation on Funding of the Scottish Energy Performance Certificate Register. The following response has been informed by the Homes for Scotland Technical Group and addresses a number of key issues raised by our members.
3. Whilst the scope and nature of this subject matter is limited, we believe the Scottish Government should not have shortened the consultation period in light of the wider range of consultations the home building and construction industry have recently been considering as key stakeholders. We are disappointed that the Scottish Government has yet again decided to reduce the consultation period of one of its consultations, and we wish to express our frustration that such a decision only goes further to distract the industry from day to day operations as well as limit industry confidence that its voice is being heard by national government.
4. We are concerned that this proposal appears to support the growing perception that the Scottish Government continues to see the development industry as a source of alternative funding for key government activities, which we feel should be supported directly by the Scottish Government given that it delivers wider public benefit. At a time where the Scottish Government has already indicated that it intends to significantly raise both Planning and Building Warrant Fees, this proposal to add further costs to the sector is highly undesirable.
5. We are concerned that there appears to have been little consideration given to whether the Scottish Government is getting best value from their current investment in the service and whether Energy Savings Trusts are best placed to act as the keeper of the register. It is difficult to understand why the

Scottish Government has not also proposed to assess whether other organisations could deliver this service more cost effectively given the significant annual direct and recurring costs identified within the consultation paper. We would advocate that the Scottish Government look to assess this aspect of the EPC register prior to increasing fees.

6. Furthermore, we are confused as to why the Scottish Government do not see themselves as a key user of the EPC Register. Whilst we accept that the Scottish Government does not necessarily lodge EPC data to the register, the consultation paper highlights that they are a main user of its output which helps inform a wide range of policy areas. We would therefore wish to ask why the Scottish Government does not wish to support the direct funding of a service which they clearly use to deliver wider public benefit.
7. Finally, it is recognised within the consultation paper that EPC data is a rich resource that can be used to inform a wide range of policy areas. This is an aspect of EPCs with which HFS agrees strongly. However, unlike in England the data held by the register in Scotland has not yet been made publically available at a wholesale level. We would advocate that public access to the entire EPC dataset would be invaluable to industry stakeholders in helping inform policy and business decisions in future. We want the Scottish Government to open this entire dataset up for public examination as is the case in England.
8. Homes for Scotland would be more than happy to discuss the comments included within this response further and gladly work with the Scottish Government Building Standards Division on key aspects of this response such as making the EPC Register publically available for wider analysis.