Response ID ANON-EPND-5RY5-V

Submitted to Heat and Energy Efficiency Technical Suitability Assessment (HEETSA) - Scoping Consultation
Submitted on 2025-08-25 11:51:20

Questions

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)?

Strongly agree

Please give reasons for your view.:

If it is the case that building owners will have legal duties to improve the fabric and heating elements of the building in line with regulatory targets, and there will be exemptions it seems suitable that a government-backed and -developed method of informing the retrofit decisions should be developed.

2 If the Scottish Government develops a HEETSA, which of the following should it cover: (select all that apply)

Retrofit assessment (i.e. identifying whether measures are present or can be installed), Retrofit design (identifying the types of measures (e.g. loft insulation) that can be installed), Retrofit specification (identifying the products or materials (e.g. mineral wool) that can be installed)

Please give reasons for your view.:

Suggest that the HEETSA should be limited to sense-checking the suggestions produced by an EPC report.

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

Government accreditation of assessor organisations who in turn accredit assessors

Please give reasons for your view.:

Given the financial and regulatory implications for building owners arising from the HiBB and PRS MEES, it seems that the government should have a role in the accreditation of assessors. Due to limited resources within the local and central government, suggest Government accreditation of assessor organisations strikes a balance between Government oversight and limited resource requirements.

4 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::

Unsure

5 There are a range of ways that identified gaps could be filled – by the market, or by the Scottish Government procuring and developing methodologies to do this. What do you think is the best approach to filling identified gaps in the methodologies required for HEETSA?

Please give reasons for your view.:

Suggest Scottish Government procuring or designing in house with experienced civil servants is most suitable. Given the implications around the HEETSA which would provide/limit access to funding from Scottish Government or exemptions for Scottish Government regulations it appears that close involvement and procurement from Scottish Government is appropriate.

6 What skills and qualifications should be required to undertake a HEETSA?

Please name existing qualifications that would be relevant and highlight any gaps that you think should be filled by new skills or qualification requirements::

Unsure, it can't be too onerous, as it would become expensive for the consumer. A Surveyor with retrofitting experience could be qualified to review the building fabric? However, the surveyor may not be qualified to review clean heating options, specifically checking the changes required to the existing heating system (example changing microbore pipes etc).

7 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

Please provide reasons for your view.:

Consider that PAS 2035 Retrofit Designer, or similar professional, should have the required skills to comment on all aspects of building fabric and heating systems. However, the depth of the assessment could mean that a single assessor is not suitable and more skills would be required.

8 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'?

Strongly agree

Please give reasons for your view.:

Agree, there has long been a suggestion from architects organisations and others for this sort of proposal, which would help new building owners to understand what retrofit measures have been carried out by previous owners, making the process of further improvements easier. Clarity and detail on where this would be stored and how this data will be accessed/managed is needed. There are pros and cons to having a central database of HEETSA's - it could easily be out of date as soon as an intervention is carried out if there is not a requirement to follow up with the installation of any works - could affect buying / selling valuations etc. but could also encourage interventions by building owners?

9 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.

Mostly agree

Please give reasons for your view.:

Assume that to ensure impartiality the HEETSA assessor would be an industry professional, separate from the contractor, and a separate step in the retrofit journey after the EPC assessor has carried out the EPC, before the contractor is procured.

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

Please provide reasons for your view.:

Aligns with understood purpose of HEETSA which is primarily to apply for exemption from meeting EPC standards set out in the HiBB and PRS MEES and associated regulations. Suggest the results of the HEETSA would only alter the recommendations on an EPC and should complement the EPC.

11 Thinking about presenting the results of a HEETSA, please give your view on:

Strongly agree

Please provide reasons for your view.:

Clarify which measures suggested on the EPC report are/are not suitable for the property, how they should be installed and what materials are appropriate. Where measures are not suitable clarifying alternative actions that can be taken, installation methods and appropriate materials.

Suggest standardised certificate/report is essential for industry consistency. Suggested included information reflects response to Question 2.

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

Please provide reasons for your view.:

To apply for exemption from meeting EPC standards set out in the HiBB and PRS MEES and associated regulations and to apply for alternative funded measures through Scottish Government funding schemes. Suggest that allowable exemptions should only be technical - not circumstantial.

13 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)

Yes

Please give reasons for your view.:

Given legal and financial implications of the EPC system in future (ie. Private rented sector and Owner occupier EPC scores) it seems necessary to develop a legal, government-back system of interpreting and sense-checking the outputs of an EPC report. Likewise, Scotland's varied and complex building stock, could be negatively impacted by blindly following the suggestions of the EPC reports, as such if this information is not going to be available on the EPC, the HEETSA seems necessary.

About you

What is your name?

Name:
Hilary Dooley

Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:
The City of Edinburgh Council

Further information about your organisation's response

Please add any additional context:

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

Publish response only (without name)

Do you consent to Scottish Government contacting you again in relation to this consultation exercise?

Yes

What is your email address?

Email:
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Where did you hear about this consultation?

Social media/email of an organisation you follow

If other, please say where::

Evaluation

How satisfied were you with this consultation?

Very satisfied

Please enter comments here.:

Long consultation period with concise documents to consider.

How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?

Very satisfied

Please enter comments here.: