



1 June 2007

Energy Efficiency and Microgeneration Strategy
Energy Efficiency Unit
Scottish Executive
Enterprise, Transport and Lifelong Learning Department
2nd Floor, Meridian Court
5 Cadogan Street
Glasgow
G2 6AT

Dear Sir/ Madam

Energy Efficiency & Microgeneration: Achieving a Low-carbon Future – A Strategy for Scotland

The Royal Institution of Chartered Surveyors in Scotland (RICS Scotland) has noted the above consultation paper and is grateful for the opportunity to participate in this debate.

RICS Scotland is the principal body representing professionals employed in the land, property and construction sectors. The Institution represents some 9,000 members: 7,000 chartered surveyors, 200 technical members and 1,800 students and trainees. Our members practise in sixteen land, property and construction markets and are employed in private practice, in central and local government, in public agencies, in academic institutions, in business organisations and in non-governmental organisations.

As part of its Royal Charter, the Institution has a commitment to provide advice to the government of the day and, in doing so, has an obligation to bear in mind the public interest as well as the interests of its members. RICS Scotland is therefore in a unique position to provide a balanced, apolitical perspective on issues of importance to the land, property and construction sectors.

Having considered the consultation document at length, RICS Scotland wishes to make the following comments.

RICS Scotland is broadly supportive of the plans outlined in the draft Energy Efficiency and Microgeneration Strategy and welcomes the contribution it makes to the wider debate on climate change.

RICS Scotland City Climate Challenge

In March this year, RICS Scotland published a report looking at how Scottish cities need to adapt in order to meet the UK government's target of a 60% reduction in carbon emissions by 2050. A copy of the report is enclosed for your information.

We are pleased to see that many of the recommendations outlined in our report are also echoed in the draft strategy. RICS Scotland particularly welcomes the emphasis placed on the need for behaviour change. We have suggested that in addition to the measures outlined in the strategy, domestic, tradeable carbon allowances should be introduced to encourage this. Domestic fuel bills should also contain clear information on energy consumption, so that consumers can compare themselves with others and monitor their own consumption. We are also supportive of the plans to introduce smart metering for domestic fuel consumption.

Building Standards

RICS Scotland notes the Scottish Building Standards Agency's (SBSA) plans for a review of building standards for 2009. In our view, building standards should be brought into line with the best European and international standards and we favour the introduction of carbon neutral building standards. However, we also stress the need to ensure that new development is not only energy efficient but also high in density, most usefully taking place in Transport Development Areas (TDAs) around transport hubs. This will reduce the need to travel and will help to create sustainable communities.

In addition, we would welcome initiatives to encourage local food production to reduce transport energy and emissions associated with supplying food from far away.

Planning and micro-generation

With figures suggesting that the built environment currently accounts for 50% of the UK carbon dioxide emissions, we support a continued focus on the energy efficiency of existing buildings. The SBSA's Home improvements – a Sustainability Guide is an excellent promotional tool. However, in order to encourage people to take up energy efficiency measures, fiscal incentives such as council tax rebates should be introduced. We recognise that some Scottish Local Authorities already offer grants for cavity wall insulation, which is available without means testing.

Planning has a key role in achieving the proposals in the draft strategy and we fully support plans to introduce change to the planning system to make it easier for householders to install micro-generation equipment. Additionally, we would welcome guidance on best practice for the provision of grants to install such devices, to protect consumers and to ensure competitiveness. It is also important that accessible information on repayment times and projected savings is available to consumers.

Energy Performance Certificates

RICS Scotland is supportive of the Scottish Building Standards Agency's plans for implementation of Energy Performance Certificates and believes they have the potential to achieve the aims of the Energy Performance of Buildings Directive. However, we suggest that an information campaign is required to ensure that the public are fully aware of their duties under this legislation and able to interpret the data provided to them in the EPCs.

Loan Action Scotland

RICS Scotland is supportive of the Loan Action Scotland and would like to see this scheme encourage and enhanced. We suggest that a campaign may be required to make the scheme better known to the SME community.

On behalf of RICS Scotland, I hope you find these comments useful. Should you wish to discuss further any of the points raised, please contact Elizabeth Bruce, Assistant Director and Head of Communications RICS Scotland, on 0131 225 7078.

Yours sincerely



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