

4. Please indicate which category best describes your organisation

(Tick one only)

Executive Agencies and NDPBs	<input type="checkbox"/>
Local authority	<input type="checkbox"/>
Other statutory organisation	<input type="checkbox"/>
Registered Social Landlord	<input type="checkbox"/>
Representative body for private sector organisations	<input type="checkbox"/>
Representative body for third sector/equality organisations	<input type="checkbox"/>
Representative body for community organisations	<input type="checkbox"/>
Representative body for professionals	<input type="checkbox"/>
Private sector organisation	<input type="checkbox"/>
Third sector/equality organisation	<input checked="" type="checkbox"/>
Community group	<input type="checkbox"/>
Academic	<input type="checkbox"/>
Individual	<input type="checkbox"/>
Other – please state...	<input type="checkbox"/>

CONSULTATION QUESTIONS

1. Are the vision and objectives as set out in sections 19 and 20 appropriate for Scotland's Sustainable Housing Strategy? Please answer Yes or No and provide fuller explanation if you wish.

Yes No

We support the vision of warm, high quality, affordable, low carbon homes. We recognise the need to take action now to establish a long-term framework and structure to improve our existing housing.

Homes and the people who live in them do not sit in isolation. People require leadership, infrastructure and support to help them live healthier, low carbon lifestyles.

We feel that an additional strategy is required to support householders to change their behaviour to ensure that the expected savings from measures are achieved and energy is used only to give desired benefit.

2. What do you think are the main barriers that prevent home owners and landlords from installing energy efficiency measures?

Based on our experience we consider the main barriers to installing energy efficiency measures as follows:

Inertia

Insulation is not a visible product and does not give an immediate tangible benefit. It is not perceived by householders as a premium product and unless a very easy choice they will let any barrier stop them installing insulation.

Funding

- The complexity and confusion of funding
- The cost of improvements
- The cost of redecoration
- Difficulty in identifying funding help
- For private sector properties the split benefit with tenants making the savings whilst landlords are normally responsible for the cost of the works
- The mixed messages on government grant funding with the short term nature of schemes such as UHIS

Lack of flexibility in assisted schemes

- Restrictions on measures available through assisted schemes, e.g. biomass not included in EAP; internal insulation to rooms-in-the-roof not included in UHIS; partial lofts <50% area not included in CERT.
- The need to set maximum contributions from a scheme limits the flexibility in schemes to meet the needs of the individual, e.g. heating

systems may exceed the grant maximum, requiring a client contribution which can prevent household from taking up EAP stage.

Lack of awareness/suspicion of savings

- Lack of awareness of the value of energy efficiency (savings and comfort)
- Cost savings versus investment – perception that £1,000s invested for returns of £10s
- Suspicion of cost savings promoted, based on theoretical heating pattern
- People accommodate fuel cost increases: as with cigarettes, petrol, and alcohol, price increases do not drive people to make a change that they do not already want to make.

Administration

- Administration burden on landlord/owner
- Mixed tenure: perception that Registered Social Landlords will block the work
- Lack of co-ordination between flats where there are multiple owners and mixed tenure
- Additional challenges for landlords coordinating to improve their dwellings.

Disruption for occupier

- Difficulties and extra work emptying lofts and rooms for access, lifting and replacing floor coverings
- Stress for vulnerable householders.

Lack of confidence

- About selecting a contractor and having strangers in the house
- In the quality of workmanship and follow up when mistakes happen.
- In measures possibly causing damage to roof or dampness ,
- In measures de-valuing property, incurring maintenance costs solar thermal/Photovoltaic's (PV)
- Concern that standards will change in the medium term, so that measures that are currently funded will be 'out of date' and insufficient to meet standards in future
- Cynicism about the amount of profit/job creation being generated by installers.

Uncertain supply chain

Limited choice of installer, high pricing, or not being able to get an installer to deliver, particularly in more remote or rural areas

Concern over embodied energy of materials, such as replacing boilers before the end of their life under the boiler scrappage; or a preference for glass wool versus sheep's wool.

3. Please explain any practical solutions and/or incentives to overcome any barriers you have identified.

We recommend the following solutions and incentives to help address and overcome barriers.

Inertia

Make installation accessible, simple, affordable and normal by providing a combination of information and practical help, encouragement for householders to notice the benefits for themselves and to tell others.

Many households do not know 'who to trust' in relation to energy efficiency improvements and there is a need for good quality, independent advice with such services being well publicised.

Funding

- The Scottish Government's National Retrofit Programme will be one of the main drivers as a catalyst in levering in ECO and in providing enabling funding to create demand, overcome barriers and being a funder of last resort.
- ECO is a new regime and the solid wall industry just developing. DECC has already identified in its impact assessment that installers may be able to capture additional subsidy. Utilities should be provided with an alternative route for discharging their ECO obligations in addition to the traditional installer route. This could best be achieved by the operation of regional ECO brokerages which creates demand, supports householders, grows the local supply chain and ensures quality. Detailed knowledge of ECO will be required and sufficient scale to ensure utility company buy-in and continuity of delivery. These brokerages would also allow more of the subsidy to be passed on to householders and allow surpluses to be utilised to support other installations. The corporate structure and governance of regional agencies may include the establishment of Community Interest Companies or the use of existing organisations.
- From delivering the Home Insulation Scheme many owners were unwilling to pay the modest sum to have loft or cavity wall insulation installed whereas the free Universal Home Insulation Scheme has been applied much more successfully. Even getting households to participate with generous grants and excellent return on investment is difficult. A cultural shift will be required for householders to be prepared to fund energy efficiency measures, whether through the Green Deal or directly.

Other activity that could lead to additional funding are:

- The incorporation of tax incentives for energy efficient homes into Scottish Land Transaction Tax replacing Stamp Duty in April 2015. This could be through lower tax band for compliant homes with a rebate if prescribed measures are applied in first year.
- The use of interest earned on Tenancy Deposit Schemes to fund measures in private rented accommodation.
- Potentially the use of corporate social responsibility or carbon offset donations to contribute to energy efficiency and affordable homes.

Lack of flexibility in assisted schemes and measures

- EAP is working and we support the vision on which EAP was established.
- In the delivery of stage 4 there is a lack of flexibility: a national one-size-fits-all programme works well in the majority of cases but not all. Area-based schemes complemented by access to a national programme as proposed by the Scottish Fuel Poverty Forum seems a desirable route.
- Whole house approach: do everything at once, rather than measure by measure reduces the number of times disruption is required and the number of times a householder has to be engaged.
- Make available hierarchy of measures: i.e. Insulation and draught proofing before energy generation. This could be incorporated into the EPC / Home Report / Private Sector House Condition Action Plan. For this to be effective, support must be made easily available to the householders, as with smoking cessation programmes. There is value in providing ongoing support to ensure action is taken and barriers are overcome. This could be achieved by a more in depth hand holding service through the Energy Saving Scotland advice network.
- Hard-to-treat, hard-to-reach: the insulation of lofts and cavities is a mature market. The supply chain has generally operated effectively and there is general market acceptance. Many of the easy installations have taken place – those that remain are often the result of additional barriers: mixed tenure, multiple ownership of a block, tenement lofts, or vulnerable householders. The removal of CERT funding will make it even more difficult to carry out the works. Additional support combined with regulation will be required to ensure that these measures are installed.
- Make available the house types and case studies referred to in the 'Developing an Energy Standard for Social Housing' consultation document.
- Concern over embodied energy of materials: make clear the balance of embodied energy vs. savings, acknowledge that this is a valid concern and encourage that awareness

Lack of awareness/suspicion about savings: provide information and advice

- Continue to support and invest in the Energy Saving Scotland advice network
- The Energy Saving Scotland advice centre network needs to develop to ensure it can support householders through the more complex mix of measures that will be part of the National Retrofit Programme
- Ensure linkage with Scottish Government advice provision, for example between Energy Saving Scotland advice network and Greener Scotland
- Ensure that free impartial advice is available to all households and that this identifies climate change as a motivation (not just focused on money saved) with reference to the recommendations of Climate Challenge Fund Review 2011
- Post-installation advice and support is needed to promote and enable

behaviour change

- Improve co-ordination of Government-funded climate change streams i.e. Energy Saving Trust, Zero Waste Scotland, Climate Challenge Fund, 2020, Greener Scotland
- Enhance the EPC to clearly prescribe treatment for the house type
- Cost savings information can be projected to reflect expected energy cost increases, to encourage early action
- Use case studies and people's stories of their success and journey to inspire others: demonstrate Normal – these need to be used actively, and made properly accessible, not just buried away on a website
- Standards will be unpopular unless properly primed, and supported, by information and advice

Administration

- Customer journey should be the focus needs to be joined-up and easy
- Provide practical support to co-ordinate flats, and with owners in mixed tenure
- Additional support to ensure that private landlords improve their stock. Work by Changeworks has demonstrated that landlords are willing to improve the energy efficiency of their dwellings with some additional support to coordinate the contractor and liaise with tenants.

Disruption to occupier

- Provide support to remove the difficulty factor: handholding and practical help through additional support to e.g. Care & Repair
- Partnership with organisations such as Care & Repair and other networks and trusted intermediaries are important to identify and support vulnerable householders, as with the current Community Liaison support for EAP
- Engage with organisations such as Junk Away that are trusted and local, and can help with loft clearances.

Raise awareness of schemes and build confidence through engagement

- Employ social marketing techniques for engagement
- Normalising behaviour: promotion of good news stories and local information 'everyone's doing it' '10 homes on your street have done it already'
- Partnership with community groups and projects to provide trusted advocate, handholding to householders, promotion locally, good news stories (case studies) – make Government funding available to these (Climate Challenge Fund now requires an element of innovation, which means successful projects are discontinued after initial funding tranche)
- Partnership with Care & Repair and similar organisations to identify and support vulnerable householders
- Transparency of subsidy – benefits of the funding must be passed on to the householder, and clearly accountable.
- Smart Meter rollout is already planned: this presents an opportunity

to survey homes, and provide advice to householders. The current proposals for implementation only allow time for very limited interaction with householders. The Scottish Government should seek for the provision of advice or the carrying out of an EPC or RdSAP survey as part of the visit.

Supporting Economic Growth

- Ensure sufficient demand to create a local supply chain which can be sustained
- Minimum standards will act as backstop and drive demand. They should be clearly set out against a timeline to 2050 with clear milestones in 2015, compared to baseline: a progress update, 2020 – with 42% CO2 reduction target – and every five years through to 2050s 80% target so that it is clear what will be required over the long term. This will provide a framework and certainty to allow business to invest.
- Support to supply chain External wall insulation – the transition from ‘easy’ loft and cavity wall measures to ECO measures will need to be supported by growing skills and awareness among builders and architects (as well as building control/planning) who could be engaged through the Regional Delivery Partner (described at Q6)
- **Concern over embodied energy of materials**
Clarify the balance of embodied energy versus savings, acknowledge that this is a valid concern and encourage that awareness. Allow solutions with low embodied energy to benefit when designing the National Retrofit Programme or other Scottish Government programmes.

4. Given Scotland’s diverse range of housing, what support is needed to enable people to get energy efficiency measures installed?

We recommend the following support is provided:

Information and advice

- Continued investment and development in the Energy Saving Scotland advice centre network which should act as an entry point for advice on improving the energy efficiency of housing
- Expansion of advice provision for ‘hard-to-treat’ homes including more support for the provision of home visits via the advice network.
- Crucial that the advice centres continue as initial points of advice but we need to ensure the networks skills are developed to deal with the more complex enquiries that ECO is likely to drive due to funding ‘hard-to-treat’ homes
- Improve information available on measures possibly in traditional ‘hard-to-treat’ homes
- Provide a small ‘innovation fund’ to support technological advance in treatment of internal and external wall insulation. This would support Scottish companies to develop and evaluate solutions
- Support window measures for traditional housing/conservation areas

– e.g. shutters, draught proofing, slim line double glazing – provide information and advice on how to, and create list of contractors and materials.

- Support for high quality draught-proofing to traditional windows and doors: provide information and advice on how to and create list of contractors and materials.

Measuring

- Take account of ‘non-standard’ window sizes in stone tenements by using a more in-depth RdSAP rather than the Home Energy Check to calculate savings from large window areas
- Improve energy saving calculations for rdSAP for non standard houses e.g. extensions, rooms in the roof, multiple heating systems which are increasingly common in off-gas properties

Supporting Economic Growth

- Accreditation and inclusion of measures in schemes ideally linked to the DECC's Green Deal list, to avoid duplicating approvals.
- Support biomass in off-gas areas: encourage the recruitment of more appliances and installers to MCS list to qualify for interest-free loan, and RHI/RHPP.
- External wall insulation: the transition from ‘easy’ loft and cavity wall measures to ECO measures will need to be supported by growing skills and awareness among builders and architects (as well as building control/planning) who could be engaged through the Regional Delivery Partner (described at Q6)
- Support internal insulation to rooms-in-the-roof; insulation of partial lofts; floor insulation (solid, and suspended): include in EAP, UHIS, ECO
- Support ‘enabling’ measures including loft hatches, roof vents, scaffolding, boxing of window sash boxes to allow Cavity Wall Insulation (CWI), include in EAP, UHIS, ECO
- Continue interest-free loans during the transition to a fully operational Green Deal model to support householders to invest in renewables.

Co-ordination of

- Funding streams/schemes: design programmes to maximise ECO investment and other investment by managing installers and funding streams ‘behind the scenes’ to make the customer journey as easy as possible
- Delivery agents
- Promotion/publicity
- Brand and identity

5. (a) What specific issues need to be addressed in respect of improving energy efficiency in rural areas, particularly more remote or island areas?

There are concerns about sufficient installers and demand to achieve economies of scale. Homes maybe easy to improve but their location

makes it difficult and expensive to get work completed cost-effectively. A well managed a coordinated area based approach should help to overcome these barriers.

Technical

- Lack of engagement with national programmes because of lack of support, or perceived lack of support, for island issues.
- Householders living in remote islands need to benefit from continued access to a contractor once a measure is completed, to allow follow up, should there be any issues. Ideally, National or regional programmes should enable householders living in remote islands to choose a local contractor
- National or regional programmes should require contractors to demonstrate a working relationship with local contractors. If there is only one local contractor and this relationship is, or becomes, damaged, a conciliation service should be provided
- Support public sector organisations e.g. NHS, schools to install biomass to strengthen local supply chain for wood pellets
- External wall insulation: the transition from 'easy' loft and cavity wall measures to ECO measures will need to be supported by growing skills and awareness among builders and architects (as well as building control/planning) who could be engaged through the Regional Delivery Partner (described at Q6)
- Unwillingness of larger contractors to overcome the challenges of delivery in remote areas
- Limited heating choice in off-gas areas
- Lack of affordable biomass/renewable heat for off-gas properties
- Include renewable systems including biomass system in the National Retrofit Programme as an alternative to electricity/oil system in off-gas properties

Engagement

- Lack of engagement with existing advice networks: 'hard to reach' community
- Engaging with tradition/resistance to change: 'selling' modern alternative and embracing traditional methods where appropriate
- Some households attached to coal use because they receive concessionary fuel allowance
- Low uptake of benefits, which are part of eligibility criteria
- Low uptake of Warm Homes Discount, Winter Fuel Payment in rural areas. Perception that EAP is of limited use in off-gas areas because it generally offers oil or electric heating, which increase the fuel cost compared to coal or wood, so people do not apply thereby missing Stage 2, benefits and Warm Homes Discount checks

- Many solid walled stone or brick properties for which cavity wall insulation is not appropriate
- Other buildings in which cavity wall insulation is not appropriate: exposed location; obstructions in void; cavity too narrow
- Rural fuel poor under heat homes. Theoretical rdSAP rating does not reflect actual fuel use/cost/carbon emissions, therefore while insulation measures are beneficial, heating measures/renewables can increase fuel use/cost/carbon emissions, e.g. heat pump can increase electricity costs and consumption

5. (b) How should these be addressed?

Technical

- Support for small businesses, training in technical skills (internal solid wall insulation) and customer service, sales, possibly provided by Regional Delivery Partner (described at Q6)
- There is an opportunity to maximise on ECO funding for solid wall insulation in rural off gas areas. With a well-coordinated ECO programme rural off-gas Scotland could be the most efficient place for Energy Utilities to invest
- Support biomass/renewable heat for off-gas properties
- Include renewables in the National Retrofit Programme as alternative to electricity/coal system in off-gas properties
- Support internal wall insulation where CWI is not appropriate. There is a need to ensure that there is sufficient monitoring of installations to ensure there is not a dampness legacy from poorly insulated walls.
- Set a clear vision for energy efficient households in Scotland with commitments to allow business to respond and look for opportunities to support business to invest
- Ensure appropriate training for surveyors and installers on CWI and solid wall insulation, possibly co-ordinated by the Regional Delivery Partner (described at Q6)
- Rural fuel poor under heat homes. Theoretical rdSAP rating does not reflect actual fuel use/cost/carbon emissions, therefore while insulation measures are beneficial, heating measures/renewables can increase fuel use/cost/carbon emissions (e.g. heat pump can increase electricity costs and consumption)

Engagement

- Support good, local, and integrated advice provision utilising partnerships with advice agencies, civic organisations and community groups
- Engage with tradition/resistance to change – ‘selling’ modern alternative and embracing traditional methods where appropriate through use of existing local networks, and community engagement (as with Digital TV rollout)
- Ensure that concessionary fuel allowance is transferrable to cash or renewable fuel for all recipients. Presently “only applies to ex British

Coal employees who left employment prior to Privatisation of the Industry. There are different rules for anyone who left employment after Privatisation. In 1995, BCC was privatised. At this point the responsibility for the Concessionary Fuel Scheme was transferred to the Department of Energy and Climate Change (DECC). Changeworks understands DECC are still responsible for the scheme.” www.ncfo.co.uk The Scottish Government should request that DECC support a transition to a low carbon alternative

- Maximise uptake of Benefits, Warm Homes Discount, Winter Fuel Payment in rural areas through use of existing local networks, and community engagement, e.g. gas with Digital TV rollout

6. Taking into account the models and funding sources outlined in section 1.20-1.37, what role might local authorities and other agencies play in bringing about a step change in retrofitting Scotland’s housing?

Please note there is some repetition between questions 6 & 7.

In summary

Plans for a National Retrofit Programme (NRP) are welcomed including continuation of local area based schemes. We agree UHIS has worked well for what are generally low cost and easily installed measures of loft and cavity wall insulation. It had the added benefit that it was closely aligned to the CERT funding regime and hence resulted in a high level of leverage of UK funds.

Under a NRP, we are moving towards whole house solutions with a larger number of potential measures. It is important that there is recognition that there is a step change moving from UHIS to NRP.

Local authorities are key but we can see the potential benefits of a number of local authorities working collectively to develop a Regional Delivery Partnership, to set a structure for the long-term investment in private sector existing homes. It is vital to the success of the Programme that each local authority has confidence in the delivery structure, and that excellent communications are maintained throughout, between all of the agencies involved whether this be through our preferred model or otherwise.

Our vision for the programme

1. The programme will or would be delivered as two elements: An area-based programme to maximise opportunities to attract ECO funding, and to maximise economic development by creating jobs, work experience and training opportunities locally
2. A National Reactive Programme to prioritise affordable warmth for those households in extreme fuel poverty, to target rural fuel poor in off-gas areas.

The Energy Saving Scotland advice centre network should be utilised to support the provision of sustainable energy advice.

Area-based programme strategy

We propose regional delivery, with groups of local authorities working collaboratively to balance economies of scales with the need for local delivery.

Working regionally makes the partnership more robust than each local authority working individually, and makes schemes more attractive to ECO investment from Utilities.

Individual area based delivery would be key but the operation of a regional framework would enable better development of the supply chain, the use of local contractors, and continuity of employment for installers.

Consideration should be given to how these regions are defined: working within the five current Energy Saving Scotland advice centre network geography boundaries may benefit from building on existing relationships.

National Reactive Programme

The Scottish Fuel Poverty Forum and Existing Homes Alliance are proposing an area based programme with a Scotland wide national programme. We see the value in this as it is going to be important to ensure that householders in the most challenging circumstances have a route to access to support without having to wait up to 10 years for the NRP area based programme to target their area.

The National Reactive Programme (NRP) could be linked to the Regional Delivery Partner to ensure that Affordable Warmth ECO funding is maximised, which has both wider eligibility criteria and more measures that can be covered than under CERT. There would also be the opportunity to take advantage of supply chain development and procurement that would be covered by the Regional Delivery Partner.

A balance will be required between allowing a response to local needs and the avoidance of a postcode lottery. The setting of minimum standards applicable across Scotland with the ability for local responses above this level may be the optimum approach.

Transparency of subsidy and flexibility in delivery

UHS worked well since it provided additional incentives to a market in which there was already significant demand and supply. The linking to CERT did result in considerable leverage, but did not maximise the leverage that could have been obtained as the CERT targets came closer and the subsidy available increased. The lack of transparency has resulted in the opportunity for installers to make significant profits.

ECO is a new regime and the solid wall industry is in the early stages of development. Department for Energy and Climate Change (DECC) has already identified in its impact assessment that installers may be able to capture additional subsidy. Utilities should be provided with an alternative route for discharging their ECO obligations in addition to the traditional installer route. Regional Delivery Partners could undertake the role of ECO brokerages to stimulate additional demand, support householders, grow the local supply chain and ensure quality. These brokerages would also allow more of the subsidy to be passed on to householders and allow surpluses to be utilised to support other installations. Detailed knowledge of ECO will be required and sufficient scale to ensure utility company buy-in and continuity of delivery.

At a regional level there should be a Community Interest Company, Social Enterprise or Voluntary Sector Organisation that delivers the National Retrofit Programme

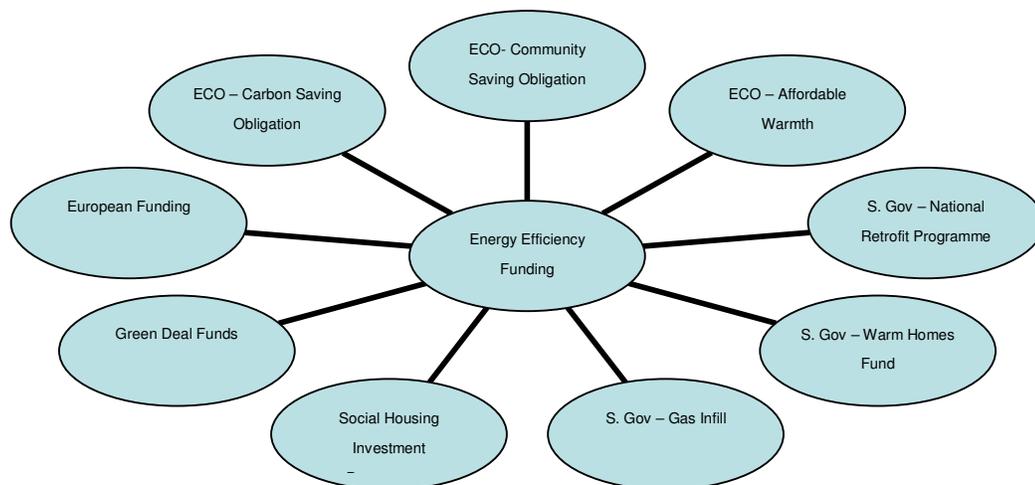
(Regional Delivery Partner). Profit should be reinvested. To maximise ECO investment and enable local business to access opportunities the delivery partner function should be independent of Utilities and Installers.

The Regional Delivery Partner could support some or all of the following coordinating tasks:

- Maximising funding with single point of delivery to the consumer
- Local authorities delivery support
- Consumer marketing and advice
- Supporting frameworks of local contractors
- Dealing with complaints and delivery issues
- Liaison and engagement with stakeholders to include housing associations, tenants/residents associations, community councils
- Grassroots community organisations, including community climate action projects, should be included as valued stakeholders and trusted intermediaries with the public
- Collate monitoring information from social housing providers who have already progressed insulating hard to treat properties, to share information on actual carbon savings and fuel bill savings. This monitoring could also help assess the accuracy of rdSAP calculations as there is this much scepticism and lack of confidence in rdSAP

Maximising funding with single point of delivery to the consumer

We fully support the aim to maximise funding from Energy Utilities through ECO and look for other funding/finance to maximise energy efficiency investment. With a delivery partner acting as a broker, ECO investment can be maximised by packaging the installed measures whilst offering a single interaction with the consumer.



With ECO split in to three streams and other funding sources available a single programme or criteria basis for the allocation of funding will not be possible to maximise the leverage.

The following programmes are likely to be the most effective in leveraging in funding whilst still meeting the objective of area-based schemes and the proposals outlined by the fuel poverty forum:

1. **Areas covered by the bottom 15% SIMD datazones and adjoining areas**

These areas qualify for the Carbon Saving Community Obligation of ECO and subsidy can be provided for both social housing and for loft and cavity insulation. These areas have been the focus of significant activity of both installers and utility companies so the potential for loft and cavity insulation will be relatively limited. There are likely to be barriers to installing measures relating to mixed tenure, private sector leasing, four-in-a-block or difficult to engage residents. Additional support and enabling measures will be required to overcome these which could be funded under the National Retrofit Programme. With additional support householder eligible for Affordable Warmth could also be identified and with assistance benefit from the additional measures available under this stream of ECO.

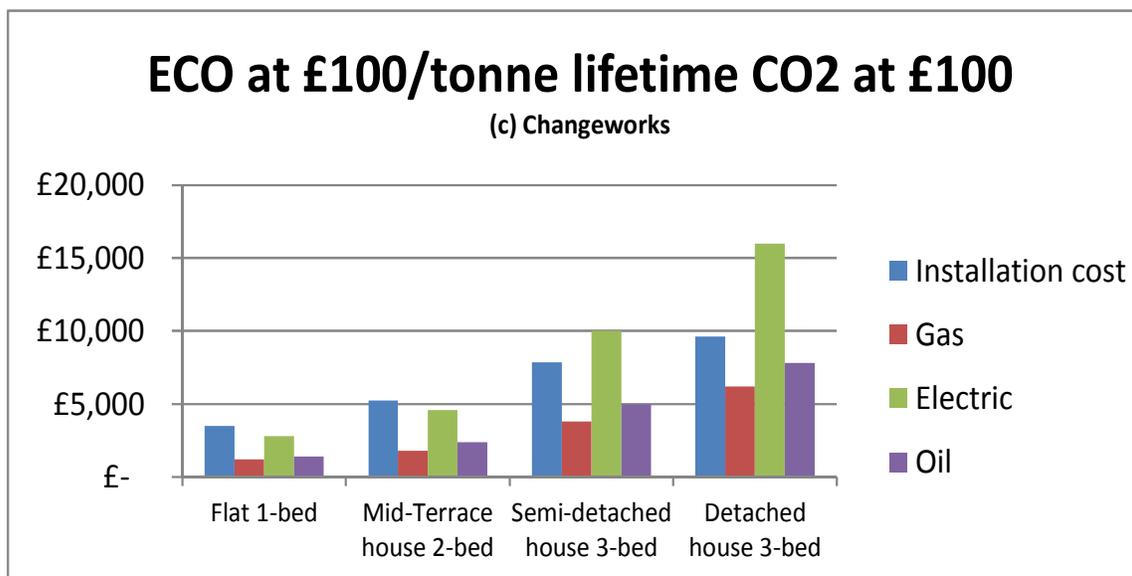
To remove the barrier of the cost of the loft and cavity insulation the funding for this could be provided by the Scottish Government. The provision of funding for loft top-up could also be considered but the carbon and fuel savings and the ECO available are relatively limited.

Carbon Saving Community Obligation ECO is likely to be available for a time limited period from January 2013 to March 2015. The Scottish Government support programme should cover the same period to allow time to overcome the barriers.

It should be possible to achieve similar levels for the ratio of Scottish Government funding to ECO levered to that achieved by the UHIS schemes which focused on loft and cavity insulation with some additional support.

2. **Area based solid wall, off-gas schemes**

The Carbon Saving Obligation ECO is only available if solid wall or hard-to-treat cavity wall insulation is included in the package of measures. To access this stream the Scottish Government National Retrofit Programme needs to be focused on this activity. The heating fuel used has a major impact on the carbon saving achieved with electrical and solid fuel heating giving much greater carbon savings for the same property as shown below.



The cost savings are also much greater so making a greater contribution to tackling fuel poverty.

From the Scottish House Condition Survey the areas with the highest levels of fuel poverty, especially extreme fuel poverty tends to be the more rural areas. How Carbon Saving Obligation ECO will work is still far from clear. The supply chain for solid wall insulation is in its infancy and there is limited information as to what the price per tonne of CO2 paid by the utility companies will be.

It could well be that if the supply chain is active, the demand is present and the value of carbon saved is passed on to householders that free or low cost solid wall insulation could be provided to householders. Area based schemes supported by the Scottish Government could play an important role in developing the supply chain and generating the demand. A regional model for ensuring the value of carbon is passed to householders is included in Changeworks' response.

To support the creation of demand Scottish Government funding could be provided to identify off-gas, solid wall properties suitable for insulation, carry out the rdSAP assessment required, support the householder in their customer journey and carry out quality assurance. Support for the development of the supply chain may also be required, especially if it is to provide local employment.

The price of carbon is not know but in the event of it being lower than that required to give free solid wall insulation additional Scottish Government support could be provided so that free measures can be provided. In its Impact Assessment DECC has identified that not all the ECO subsidy may be passed on to householders with the utility companies or the Green Deal supply chain benefiting.

Local authorities would have a key role in identifying the areas which must contain sufficient numbers of suitable properties to justify the development of the supply chain. It needs to be recognised that external wall insulation is not yet a widely accepted measure and so initially only a proportion of the suitable homes are likely to take up even free insulation. This will require a larger number of properties to be included in an area and a longer time frame than one year would be desirable.

There will be further roles for local authorities in either procuring or overseeing the other elements of the programme.

Although the focus of the area based programme would be on solid wall properties to ensure that all householders are included a programme of uptake of energy efficiency behaviours, referrals through to Affordable Warmth and loft and cavity insulation under the Green Deal could be included.

3. Affordable Warmth

The Fuel Poverty Forum identified the need to ensure that for those householders most in need did not need to wait for an area based scheme. The third stream of ECO, Affordable Warmth also seeks to address some of the needs of those deemed most in need.

Affordable Warmth ECO does support a wider range of measures and more eligibility criteria than that covered by the super-priority funding of CERT. It could go some of

the way to fill the void left by the end of the EAP programme. Since eligibility is dependent on receiving passport benefits a Scottish Government programme to encourage the uptake of benefits would have the added benefit of ensuring a greater number of householders are eligible for Affordable Warmth ECO.

There will be a need to ensure that householders eligible for Affordable Warmth get the full value of any savings that can be achieved. It is more cost effective in terms of fuel savings to carry out measure in electrically heated properties. Such householders should be able to receive additional measures or cross subsidy should take place between electrically heated properties and other forms of heating. This is proposed in the Regional Delivery Model outlined as part of our submission.

Role of local authorities

We agree that local authorities are key to the long-term success and their leadership, involvement and branding will enhance the delivery of the National Retrofit Programme. We think there is merit in a number of local authorities working at a regional level to enable sharing of skills and learning, and to benefit from economies of scale.

We would highlight the following:

- Local authorities will set the strategy for the NRP and the Regional Delivery Partner
- Local authorities are busy with varying local priorities, involvement levels may vary but a programme needs to progress. Support required from the Regional Delivery Partner may vary from one local authority to another
- Local authorities have different skills and abilities to run the NRP. One key factor maybe in relation to the size of the housing stock they own and manage. For example, if a local authority has transferred its stock to a Housing Association it may not have staff that could lead on procuring domestic heating systems
- With a regional partnership of local authorities, skills can be purchased by the Regional Delivery Partner from individual local authorities for the benefit of the region. For example, where a local authority has available procurement or contract management skills these could be purchased to benefit the region. This provides the partnership access to skills, avoids replication of tasks whilst funding local authorities for tasks beyond their core role
- The area based programme will link to Local Housing Strategies and link to local authority programmes of work – ECO could support RSL cladding or window and doors replacement programmes, if properly coordinated
- Regional Delivery Partners will support local authorities in developing and promoting fuel poverty and energy efficiency programmes in response to needs identified within local housing strategies. Local housing strategies should include specific commitments on emissions and fuel poverty reductions from social and private housing stock
- If the funding from the Scottish Government is given directly to local authorities via a formula based model, this should be ring-fenced to NRP activities
- Landlord Registration/Accreditation Schemes can be used as a point of influence at which to introduce standards: e.g. Houses in Multiple Occupation (HMO) licensing stipulates upgrades to doors for fire prevention: insulation and minimum heating standards could also be introduced here.

Local authorities also have a duty under the Climate Change Act to deliver a Council Tax Rebate Scheme. This has relied on a CERT subsidy through the Energy Utilities. Local authorities will need to consider how to link their duty to have a Council Tax Rebate Scheme to the NRP and may need some renewed guidance on this.

Partnership with other agencies

- Local authorities and Regional Delivery Partners will benefit from partnering with the Energy Saving Scotland advice centre as a one-stop shop for advice and referrals. It is important that links are made with Energy Saving Scotland advice centres in order to maximise referrals for fuel poverty funding
- Local authorities and Regional Delivery Partners will benefit from partnerships with other agencies, in their area relevant to achieving their common goals, e.g. cross-referrals for advice services, including advice providers, NHS health visitors, hospital discharge response teams, midwives, WRVS, Care & Repair, adult learning centres, Gingerbread, SCVO, Citizens Advice Service, Pension Service. Examples of this are Fife Council's Fife Save network, which utilises community projects to deliver promotion and face-to-face advice, in partnership with Energy Saving Scotland advice centre; and in the Highlands and Islands the pan-agency project 'Healthy Homes for Highland' involves several statutory agencies working in partnership with Energy Saving Scotland advice centre. These examples should be promoted to other local authorities and community projects to encourage this approach
- Grassroots community organisations, including community climate action projects, should be included as valued stakeholders and trusted intermediaries with the public. They are often early adopters on sustainability of materials used, and seeking to use local contractors.
- The local authorities and Regional Delivery Partner should work with local partners including community councils to maximise knowledge of hard-to-treat properties, mixed tenure areas, gas infill potential, and opportunities to engage people. Consultation would benefit the programme by increasing uptake and overcoming areas of resistance
- Green Deal providers: local authorities must forge strong relationships with suppliers/installers of Green Deal measures. The public will look to them for guidance and they must ensure that they provide people with the right/best information.

Endorsement

- Local authorities are generally trusted sources of information. Adding their brand to communications to private householders is likely to increase uptake
- Community organisations, including community climate action projects, are generally trusted sources of information. Adding their brand to communications to private householders is likely to increase uptake
- Community organisations can often offer 'good news' stories about households that have made improvements, adding a very human element to communications, and adding momentum to projects.
- Community councils and community projects are valuable in providing feedback on how programmes are being delivered from the householders' perspective. This can provide useful feedback which can be quickly acted on to improve the service.

Procurement

- The regional model would allow for development of a framework or 'pool' of contractors on a regional basis. This would allow smaller local installers to be selected for works when they would not necessarily win the bigger tenders. This approach has been successfully piloted in the Highlands and Islands Energy Saving Scotland advice centre
- The regional model could create a structure to provide best value while minimising the work, cost and skills required by the installer for the contracting process by designing the process sympathetically – small companies are often put off by the paperwork
- Procurement would depend on the local circumstances, but the Regional Delivery Partner could have a role in procurement, or this could be led by a local authority partner on behalf of the collective
- Where local authorities or housing associations are procuring works for their own properties (e.g. external wall insulation, renewables) they could look to extend contracts and prices to private households within the same area, e.g. solid wall insulation; connection to the Gas Grid.

Planning and building control

- Local planning regulations should be reviewed to take account of measures required to meet energy standards – to accommodate appropriate glazing, efficient heating, and renewables. This includes the requirement to submit drawings which may not be necessary, e.g. when replacing the glazing in wooden single glazed sash with slim line double glazing, or applying identical treatments to multiple properties. Planning/building control should be aware of this agenda, and accommodate it.

Communications

- To ensure the most vulnerable households are identified – excellent referral networks and training to social work, health care, childcare, other advice agencies such as Citizens Advice to recognise appropriate referrals, and communicate the benefits to clients
- Local authorities' departmental links/networks could be strengthened to avoid duplication of work or mismatched communication
- Local authorities/Housing Associations should keep tenants and their private sector neighbours well informed and educated about programmes and services that they could benefit from
- Keeping tenants and their private sector neighbours informed of timescales/scales of retro-fit where applicable. Clear communications are key to build understanding and gain tenants and owners trust

Other options

A Regional Delivery Partner may not be desired by all areas but it is hoped that other delivery models would incorporate many of the characteristics outlined particularly in relation to ECO brokerage, transparency and the wider economic benefits.

7. What role should the Scottish Government play in a National Retrofit Programme?

Please note the first section of this response has also been included under Question 6.

The Scottish Government has a key role should play a key role in supporting the framework to deliver the National Retrofit Strategy and providing funding which will make Scotland the most cost effective place to achieve carbon and fuel cost savings through ECO.

With ECO split in to three streams a single programme or criteria basis for the allocation of funding will not be possible to maximise the leverage.

The following programmes are likely to be the most effective in leveraging in funding whilst still meeting the objective of area-based schemes and the proposals outlined by the fuel poverty forum:

1. Areas covered by the bottom 15% SIMD datazones and adjoining areas

These areas qualify for the Carbon Saving Community Obligation of ECO and subsidy can be provided for both social housing and for loft and cavity insulation. These areas have been the focus of significant activity of both installers and utility companies so the potential for loft and cavity insulation will be relatively limited. There are likely to be barriers to installing measures relating to mixed tenure, private sector leasing, four-in-a-block or difficult to engage residents. Additional support and enabling measures will be required to overcome these which could be funded under the National Retrofit Programme. With additional support householder eligible for Affordable Warmth could also be identified and with assistance benefit from the additional measures available under this stream of ECO.

To remove the barrier of the cost of the loft and cavity insulation the funding for this could be provided by the Scottish Government. The provision of funding for loft top-up could also be considered but the carbon and fuel savings and the ECO available are relatively limited.

Carbon Saving Community Obligation ECO is likely to be available for a time limited period from January 2013 to March 2015. The Scottish Government support programme should cover the same period to allow time to overcome the barriers.

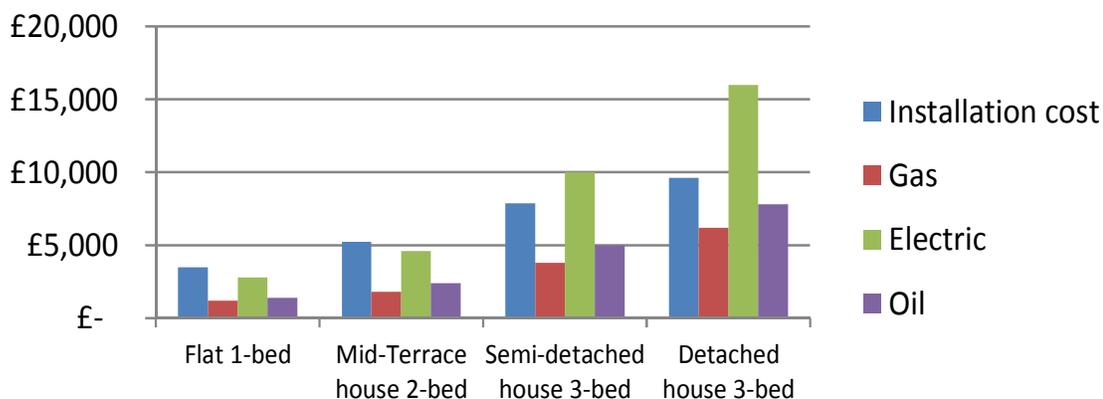
It should be possible to achieve similar levels for the ratio of Scottish Government funding to ECO levered to that achieved by the UHIS schemes which focused on loft and cavity insulation with some additional support.

2. Area based solid wall, off-gas schemes

The Carbon Saving Obligation ECO is only available if solid wall or hard-to-treat cavity wall insulation is included in the package of measures. To access this stream the Scottish Government National Retrofit Programme needs to be focused on this activity. The heating fuel used has a major impact on the carbon saving achieved with electrical and solid fuel heating giving much greater carbon savings for the same property as shown below.

ECO at £100/tonne lifetime CO2 at £100

(c) Changeworks



The cost savings are also much greater so making a greater contribution to tackling fuel poverty.

From the Scottish House Condition Survey the areas with the highest levels of fuel poverty, especially extreme fuel poverty tends to be the more rural areas. How Carbon Saving Obligation ECO will work is still far from clear. The supply chain for solid wall insulation is in its infancy and there is limited information as to what the price per tonne of CO2 paid by the utility companies will be.

It could well be that if the supply chain is active, the demand is present and the value of carbon saved is passed on to householders that free or low cost solid wall insulation could be provided to householders. Area based schemes supported by the Scottish Government could play an important role in developing the supply chain and generating the demand. A regional model for ensuring the value of carbon is passed to householders is included in Changeworks' response.

To support the creation of demand Scottish Government funding could be provided to identify off-gas, solid wall properties suitable for insulation, carry out the rdSAP assessment required, support the householder in their customer journey and carry out quality assurance. Support for the development of the supply chain may also be required, especially if it is to provide local employment.

The price of carbon is not know but in the event of it being lower than that required to give free solid wall insulation additional Scottish Government support could be provided so that free measures can be provided. In its Impact Assessment DECC has identified that not all the ECO subsidy may be passed on to householders with the utility companies or the Green Deal supply chain benefiting.

Local authorities would have a key role in identifying the areas which must contain sufficient numbers of suitable properties to justify the development of the supply chain. It needs to be recognised that external wall insulation is not yet a widely accepted measure and so initially only a proportion of the suitable homes are likely to take up even free insulation. This will require a larger number of properties to be

included in an area and a longer time frame than one year would be desirable.

There will be further roles for local authorities in either procuring or overseeing the other elements of the programme.

Although the focus of the area based programme would be on solid wall properties to ensure that all householders are included a programme of uptake of energy efficiency behaviours, referrals through to Affordable Warmth and loft and cavity insulation under the Green Deal could be included.

3. Affordable Warmth

The Fuel Poverty Forum identified the need to ensure that for those householders most in need did not need to wait for an area based scheme. The third stream of ECO, Affordable Warmth also seeks to address some of the needs of those deemed most in need.

Affordable Warmth ECO does support a wider range of measures and more eligibility criteria than that covered by the super-priority funding of CERT. It could go some of the way to fill the void left by the end of the EAP programme. Since eligibility is dependent on receiving passport benefits a Scottish Government programme to encourage the uptake of benefits would have the added benefit of ensuring a greater number of householders are eligible for Affordable Warmth ECO.

There will be a need to ensure that householders eligible for Affordable Warmth get the full value of any savings that can be achieved. It is more cost effective in terms of fuel savings to carry out measure in electrically heated properties. Such householders should be able to receive additional measures or cross subsidy should take place between electrically heated properties and other forms of heating. This is proposed in the Regional Delivery Model outlined as part of our submission.

Dependent on the value set by the Utility Companies on the savings achieved through Affordable Warmth the Scottish Government may wish to consider providing additional top up support so that the Affordable Warmth householder does not have to enter in to the Green Deal.

The Scottish Government may wish to consider if there are any particular groups that they may wish to support that are not covered by Affordable Warmth ECO but are considered to be in need.

Other Issues

We do not believe that a Scotland-wide brokerage would be flexible enough to support competitive pricing and so favour a regional approach.

Further roles for the Scottish Government should play are:

Joining up strategy

Opportunities for aligning Scotland's Sustainable Housing Strategy with other strategies should be identified e.g. between RPP and the Sustainable Housing Strategy.

The Government's vision that no one in Scotland has to live in fuel poverty and that a national retrofit programme will tackle this, needs to be reflected in regional NHS

strategies to ensure the resources of the NHS are used to identify and help engage vulnerable householders, most at risk of fuel poverty. Similarly, the aim for refurbishment and house-building to contribute to Scotland's low carbon economy should be aligned for instance, with Scotland's National Transport Strategy recognising that new housing developments should provide safe, healthy, low carbon ways to travel, and people living in existing houses should have similar access

Setting benchmarks

Establishing energy efficiency standards for all households, regardless of tenure.

Supporting the area based programme with National Reactive Programme

The Scottish Fuel Poverty Forum and Existing Homes Alliance are proposing an area based programme with a Scotland Wide National Programme. We see the value in this as it will be important to ensure that householders in the most challenging circumstances have access to support without having to wait up to 10 years for the NRP area based programme to target their area.

Consideration needs to be given to how this would work and we would propose a centralised decision making of cases which are referred into the regional partnerships for delivery of interventions. Care is needed to avoid setting up duplicating deliveries where funding is invested in regional and national delivery structures.

Researching and supporting technological development

- Provide research specific to Scottish house types, particularly in modern technological solutions for house types that are common in Scotland and less common elsewhere in the UK
- Provide a small 'innovation fund' to support technological advance in treatment of internal wall insulation. This would support Scottish companies to develop and evaluate solutions

Providing mapping for area based delivery

The Scottish Fuel Poverty Forum refers to a heat mapping exercise to be completed. We recognise this would be a useful tool but it is important to note that local authorities - and others who work in this field - know their area and need flexibility to deliver.

We would support the development of a Scotland wide mapping tool that allows filtering to local authority and data zone level. The mapping could utilise the new census data and the various data sets that are available to support fuel poverty and ECO 'hot spot' identification:

- A Scottish fuel poverty map that allows prioritisation of householders in or at risk of fuel poverty at local authority and data zone level. While Local Authorities hold existing fuel poverty maps, new data from the census is available and should be used to update the existing fuel poverty mapping to enable local authorities to prioritise and co-ordinate action in priority areas. Maps should show definition to ward or preferably data zone levels. This should be published and readily available to community climate action projects to inform their project planning, supporting the efficient use of Climate Challenge Fund
- ECO funding potential map, prioritising wards or data zones where ECO objectives are met, to support identification of different streams of ECO

These data sets will allow a prioritisation of areas, combining the need to tackle those most at risk, and ensure ECO spend is maximised. From initial research by Changeworks there is not close correlation of these objectives.

Facilitating utilities to maximise ECO

Continue to engage Energy Utilities through a Ministerial working group to facilitate strong partnerships as a local level.

Evaluating and monitoring

- Evaluate and publish progress to date and put in place learnings (e.g. on UHIS, EAP) – this could be done by Scottish Government or an appointed other
- Set criteria for evaluation including effectiveness in addressing fuel poverty and leverage of ECO; stipulate that this is public, equitable, transparent and accountable
- There is a risk that some local authorities may not be able to deliver the NRP to the same level as others. To determine the extent to which this is the case, the Scottish Government will need to put in place monitoring indicators that are sufficient to identify support needs quickly
- Where needs are identified the Scottish Government should put in place mechanisms to provide support to local authorities.

Supporting the agencies involved in the regional delivery

- The Scottish Government should provide long-term and sustainable funding streams for programmes spanning 5-year periods, those streams to reflect development and delivery times for retrofit projects
- Encourage and support local authority leadership, e.g. on Green Deal delivery
- Fund Energy Saving Scotland advice centres to provide advice on energy efficiency measures, and sustainable behaviour change. There should a strong link to Greener Scotland to ensure consistency of communications
- Co-ordinate energy advice provision through Energy Saving Scotland advice centres, national organisations and local organisations particularly in rural areas
- Set criteria for evaluation including effectiveness in addressing fuel poverty and leverage of ECO; stipulate that this is public, transparent and accountable
- Beyond the NRP it is important that other advice and support services which will be valued by partners are adequately funded. This may include advice providers, NHS health visitors, hospital discharge response teams, midwives, WRVS, Care & Repair, adult learning centres, Gingerbread, SCVO, Citizens Advice Service, Pension Service, and community groups
- Use existing programmes such as Greener Scotland to provide information on energy efficiency Standards, and Programmes, and Partners; work with the Regional Delivery Partners (see response to Q6 for description) to co-ordinate PR for the schemes to ensure consistent message

Planning

We would encourage the Scottish Government to amend planning policy relating to energy efficiency, so that planning authorities could come to some agreed standards or property types where planning would not be required.

Changeworks has carried out a number of projects working with planning departments

on energy efficiency and renewable installation. This has included a review of the requirement for building warrants for solar panels in East Lothian which led to an agreed policy across Scotland. Changeworks carried out a joint research project with Edinburgh World Heritage, Historic Scotland and City of Edinburgh council on double glazing in historic properties. The research and report on slim line double glazing changed Edinburgh's policy on glazing in conservation areas and for listed buildings.

To be effective, this change and agenda would need to be rolled out to all staff in all planning departments.

8. What role could the devolution of additional powers play in achieving more retrofit?

No comment

9. What further action is needed to achieve the scale of change required to existing homes?

- Minimum standards are required to drive demand for the NRP
- Scottish Government funding for the NRP will need to increase to meet fuel poverty and climate change targets
- Effective promotion of help available/schemes to tenants and home owners, using appropriate messages for the target audience
- Effective partnerships to ensure measures installed are maximised and the most vulnerable households are reached
- Incentive for private landlords to improve the standard of their property: current Landlords Energy Saving Allowance (tax rebate) does not work because many landlords do not pay tax and have only one property, covering its mortgage and maintenance
- Effective systems and procedures to ensure installers are reputable and work is of a high standard: a Quality Assured Warmth Scheme or independent checks.
- Specific support to help co-ordinate projects in flats and buildings with multiple dwellings, either through local authorities, the Energy Saving Scotland advice centre network, or a combination of both. This may also need to be backed up by some regulatory change to stop individual owners holding up projects
- A change in culture: current perception is that energy efficiency improvements are only for affluent people, for example, as seen on 'Grand Designs', rather than mainstream. That a nice kitchen is more important than an efficient heating system. We need to normalise energy saving and incorporate energy efficiency measures wherever possible into improvements, renovations, and repairs
- Effective partnerships to ensure measures installed are maximised and the most vulnerable households are reached
- Effective systems and procedures to ensure installers are reputable and work is of a high standard
- An effective and up-to-date searchable Home Energy Efficiency Database

which households can be 'searched' to see what has been done, what can still be done, using EPC data and other data sources. EPC data is already available to the Green Deal remote advice provider, and this could be used to target particular areas.

- Set clear direction and timescales to allow businesses to plan ahead
- Develop energy efficiency as something that builders incorporate into their work
- Ensure that contracts are designed to be accessible to small local businesses
- Continued support for the provision of independent advice through the Energy Saving Scotland advice centres

10. How can we make sure a National Retrofit Programme maximises benefits to all consumers (for example, older people, those from ethnic minorities, those with long term illness or disability)?

Energy Utilities have a responsibility to their shareholders to ensure that ECO is delivered as cost effectively as possible. This does mean that there may be a risk that contractors may choose not to focus on more challenging situations where higher costs may be incurred. The availability of the NRP means these gaps can be plugged and the right level of care and support can be provided for the most vulnerable clients to help them through their journey.

It is also worth considering some of the lessons from the delivery of EAP stage 4. Whilst some great work was done there was sometimes little flexibility in delivery and people did not progress because of levels of disruption. Levels of disruption were sometimes higher than necessary as contractors would not use existing pipework or would require electric heaters to be disconnected. A more customer focused solution may have supported installs in people's homes that were frightened by levels of disruption.

For the NRP we also think the following will help:

Engagement

- Present a single, long-term, unified brand to support consumers and advice agencies
- Design an effective public engagement campaign to build people's awareness and understanding, involving talks, workshops, community events, 'meet the installers' events, Q&A sessions, making information available to relevant groups and organisations, as with Digital TV rollout. Work closely with the Energy Saving Scotland advice centres, advice agencies and community groups to develop and deliver this
- Continue the role of the Community Liaison Officer for those in fuel poverty within the Energy Saving Scotland advice centres – part of this is about training frontline staff such as social workers, who are in a position to identify someone that may be eligible for support and make a referral to the advice centres. Similar training arrangements could be put in place to raise awareness of the NRP. Energy Saving Scotland advice centres would then be able to make an assessment of the householder's eligibility for different schemes.
- Promote interaction with other civic activity not directly associated with energy – such as charity shops, WRVS.

Delivery

- Provide a single point of contact for householders to ensure a streamlined customer journey for the householder: providing consistent advice and information, maximising the uptake of the appropriate schemes including eligibility for programmes such as EAP, and offering impartial advice, tailored to the individual, about the various options available to them
- Present an attractive offer for all householders – fuel poor and able to pay, including behaviour change advice and ongoing support as a key element
- Use a Regional Delivery Partner (see response to Q6 for description) to pull together different funding streams, to maximise offer to householders whilst presenting an easy, simple offer
- Provide direct support and assistance via trusted and established intermediaries to reach these groups. Including for example, funding to Care & Repair to provide a front line of contact to the most vulnerable. Extend these services to those not included, but with similar needs – incapacitated but not eligible for Care & Repair support because not on DLA/over 50
- Ensure adequate reporting capability to support the partner agencies' needs: they need to be able to quantify their contribution, to meet their funders' requirements
- Provide support for skills and training to partners, especially in solid wall insulation and other less 'normal' measures. This could be delivered through, or in partnership with, the Regional Delivery Partner
- Partnerships with community groups and projects where there are complementary shared objectives should be encouraged and valued
-

11. (a) Should the Scottish Government consider whether a single mandatory condition standard (beyond the tolerable standard) should apply to all properties, irrespective of tenure?

Yes No

11. (b) If so, how would that be enforced?

We think a single condition standard should be introduced and this should be enforced through Local Authorities. It is important that local authorities are resourced to undertake this task.

12. (a) In box 6 we identify a checklist for maintaining a quality home. Do you agree with our proposed hierarchy of needs?

Yes No

12. (b) If you think anything is missing or in the wrong place please explain your views.

No specific reference to windows and doors, although there is to insulation and more clarity could be given on what this includes.

On point 5. "Review your boiler to ensure that it is efficient."

- Not everyone has the same understanding of 'boiler'. To many people this is what they call their hot water cylinder – suggest 'heating system'
- Not everyone has a boiler, so could be rephrased to 'Check whether or not your heating system is as efficient as it can be. If it's not, consider improving controls, or replacing it.'

13. Should local authorities be able to require that owners improve their properties, in the same way they can require that they repair them? For example, could poor energy efficiency be a trigger for a work notice? Please answer Yes or No and provide further explanation if you wish, for example on how this might work.

Yes No

Yes, however in practice this will only have impact if resources are allocated to enable this to happen. We can see that this power would be useful initially in co-ordinating work in blocks, both mixed tenure, and multiple owners.

14. Should local authorities have a power to enforce decisions taken by owners under the title deeds, tenement management scheme or by unanimity? For example, should they have explicit powers to pay missing shares of owners who are not paying for communal repair work, in the same way they can for agreed maintenance work? Please answer Yes or No and provide further explanation, if you wish.

Yes No

We think this is crucial to ensure that good conditions are maintained within flatted properties and think this should be extended to improvements where the majority are supportive.

15. Should local authorities be able to automatically issue maintenance orders on any property which has had a work notice? Please provide further explanation if you wish.

Yes No

No comment

16. Should the process for using maintenance orders be streamlined, and if so, how? Please answer Yes or No and provide further explanation, if you wish.

Yes No

No comment

17. Should local authorities be able to: a. issue work notices on housing affecting the amenity, and b. require work such as to improve safety and security on properties which are outwith a Housing Renewal area? Please answer Yes or No and provide further explanation if you wish.

Yes No

No comment

18. Should local authorities be able to issue repayment charges for work done on commercial properties, in the same way they can for residential premises? Please answer Yes or No and provide further explanation below, if you wish.

Yes No

For example, on ground floor shops that are blocking Cavity Wall Insulation on flats above; or where the loft space is technically in shared ownership.

19. What action, if any, do you think the Government should take to make it easier to dismiss and replace property factors?

No comment

20. What action can be taken to raise the importance placed by owners and tenants on the energy efficiency of their properties?

- Encourage estate agents to include a focus on the energy efficiency when they market properties.
- Provide awareness training for estate agents, solicitors and similar professionals who support people when buying homes.
- Provide advice support and information to change behaviour
- Raise awareness of EPC and how much the property can be expected to consume (as with white goods)
- Increase visibility within the EPC of running cost and CO2 emissions compared to potential running cost (as with vehicles gCO2/km count)
- Co-ordinated PR, information and advice
- Normalising energy efficiency improvement through press, TV and media as with smoking ban or introducing seatbelt regulations.

21. Should the Scottish Government introduce minimum energy efficiency standards for private sector housing?

Yes we think a minimum energy efficiency standard is required.

Committing to this in 2015 will allow householders to understand the burden coming and for advice agencies to promote the incentives available. We do think there should be provision for exemptions in some circumstances and think the standard should be like the one proposed for social housing e.g. to

reach an Energy Efficiency rating, rather than prescribing measures.

The Scottish Land and Building Transaction Tax (replacing Stamp Duty in April 2015) could be used to provide an incentive: could be charged at a higher rate for non-compliant properties, with a rebate for purchasers making the recommended improvements within the first year

22. How could we amend EPCs to make them a more useful tool for influencing behaviour change to improve energy efficiency?

- Highlight availability of free impartial advice, from Energy Saving Scotland advice centres, on the EPC
- The data protection should assume that the ESSac's can contact clients to provide energy advice. This would allow homes which could benefit from measures to be targeted. The ESSac will have access to the EPC register (as part of the Green Deal remote advice) and this follow up advice would help clients to act on recommendations and identify funding.
- Make EPCs available in full as part of the lease pack for assured tenancy (not just in the meter cupboard)
- Make it compulsory that estate agents should make the entire EPC available when looking at property and downloadable from website
- Make more of the running cost, not just the rating band (as with white goods labelling) this appears on P2 but is not obvious
- Have clear on front page what the "potential" would be if all measures were to be carried. The "potential" rating on the front page only takes account of "low cost measures" (i.e. under £500)
- Make clear that the running costs on an EPC do not take into account appliance use
- Enhance the EPC second page to prescribe treatment for the house type
- Tailor advice within EPC for particular house type
- Raise awareness of EPCs and energy costs to prospective tenants/purchasers

23. Are there other key principles that we ought to consider when looking at the possible introduction of regulations?

The Scottish Government needs to consider the challenging climate change targets and be ambitious when setting targets. Setting out a long-term and challenging vision will help advice providers, green deal providers, contractors engage and motivate householders to act and be ahead of standards.

Additional considerations:

- Provide information about the why and the when as well as the what
- Provide clear timelines and milestones
- There is a continuing difficulty in maintenance of tenemental property. There is an opportunity to incorporate energy efficiency measures into solutions being developed to address this
- Ahead of the change of standards a major promotion and education

campaign should be initiated targeting the conveyancing industry, private landlords and letting agents. This should promote the timelines for compliance, support available and incentives

- Ahead of the regulation being in place all renters and purchasers of property should know which year's Standard the property meets

24 How could regulation be used to support the uptake of incentives?

A clear vision of what the energy efficiency standard for a home should be needs to be set out. In addition the long-term challenging vision will allow us to promote incentives and say how efficiency a home should be in 20 years time. This combined with a campaign to raise awareness of the regulation which will follow, and when. Incentives could be offered from 2015, with regulation to follow at 2020.

25. In section 2.68 we identify design options for the standard. Do you have any views on the options set out in that report? Are there other options that we should be considering?

(3) Standards based on a recommendation for the property to reach a certain energy efficiency standard, for example by setting an EPC score that must be achieved. A home could have different combinations of energy efficiency measures to reach a given EPC rating, or a specified u value.

- Use a table of house types, as with 'Developing an Energy Efficiency Standard for Social Housing' p27 and case studies for non-standard and non-gas/electric homes as referenced in that document?
www.scotland.gov.uk/Topics/BuiltEnvironment/Housing/sustainable/standard/consultationdraftsofcasestudies
- Use the EPC to prescribe and prioritise measures for the house type, with supportive advice provision to encourage use of all cost-effective measures, not just the minimum

We think the SHQS model will be more challenging to regulate and enforce and favour a model where people can choose the route to meeting the standard.

26. Do you agree that any regulations for private sector housing ought to reflect the energy efficiency capacity of the property and/or location, as is proposed for the social sector?

Yes No

Yes we feel the link with fuel type and property type is a good proxy for setting a target. We think the same target set out for social housing will work for the vast majority of private sector homes. We do feel there should be a path for exemption which might include:

- Within the limits of cost-effectiveness, as with the Golden Rule of Green Deal

- within limits of reasonable upheaval: e.g. floor insulation, internal wall insulation should not be compulsory other than when refurbishment is taking place, such as glazing to be upgraded as windows are replaced
- Consideration to the period features of traditional/historic buildings

27. If you agree with Q26, should houses of the same type in the social and private sectors be expected to meet the same standard?

Yes No

We agree they should meet the same standard but the timescale should be different. We would expect social housing to meet the target first, then private sector landlords and finally owner occupiers. Having the same standard for all tenures will allow contractors to develop their offering in well managed social housing with other tenures benefiting from this skilling up of industry. In addition it supports action in mixed tenure blocks as all tenures need to meet the same standard – albeit at different times. It may encourage owners to join in social landlord programmes of work.

28. Are there other specific issues we need to consider in introducing regulation on the energy efficiency of the home for particular groups of people, for example older people, those with disabilities, people from minority ethnic communities?

- Work should be within limits of reasonable upheaval: e.g. floor or internal wall insulation should not be compulsory other than when refurbishment is taking place; glazing to be upgraded as windows are replaced.
- There may be a case for exemption from some measures e.g. replacement of heating system or controls where householder suffers memory loss or confusion
- This will require careful, co-ordinated, and consistent communication, in partnership with local agencies, as Energy Saving Scotland advice centres do with EAP, and as with the Digital TV rollout
- Close working with social care staff, hospital discharge response teams, and carers needs to be built in – there are examples of this with Changeworks' Warm and Well projects

29. Should we consider additional trigger points to point of sale or rental? If so, what?

Yes No

- Refurbishment: window replacement, loft conversion, extension, heating replacement
- Any works subject to Building Control and planning consents
- HMO licence application
- Landlord registration

- Re-issue of EPC (long-term rented properties)

30. Should rollout of any regulation across the owner occupied and PRS sectors be phased or all at once? If you think that rollout should be phased how do you think this should be done?

Yes No

We agree they should meet the same standard but the timescale should be phased. We would expect social housing to meet the target first, then private sector landlords and finally owner occupiers. Having the same standard for all tenures will allow contractors to develop their offering in well managed social housing with other tenures benefiting from this skilling up of industry. In addition it supports action in mixed tenure blocks as all tenures need to meet the same standard – albeit at different times. It may encourage owners to join in social landlord programmes of work.

That said we do recognise there will be some challenges with this approach:

- Phased rollout could lead to Registered Social Landlords selling their worst properties to the private sector.
- Simultaneous rollout, with Social Housing Sector would support Registered Social Landlords and homeowners to co-ordinate work to mixed tenure blocks
- Simultaneous rollout with Social Housing Sector would support local authorities and partners to co-ordinate area-based schemes
- As with EPC rollout, it may confuse owners and landlords (and advisors) to have a period of different regulation, so simultaneous rollout is preferred

Some of these could be mitigated if it was clear that all tenures would be required to meet this standard and what the long-term standard would be. The 2050 target could be set and milestones in 2015, 2020 – with 42% CO2 reduction target – and every 5 years through to 2050 and the 80% target so that its expectations are set on what will be required over the long term, i.e. this property meets the standard for 2015: the following work will be required to meet the 2020 standard.

Consideration should be given to treatment of private rented properties with sitting tenants that do not have an EPC. These tenants are the most vulnerable in this scenario, being reluctant to risk animosity with their landlord through requesting that their home meet the standard

31. What other issues around enforcement do we need to think about when considering how different approaches to regulation might work?

please see Q30

32. In sections 2.76-2.79 we suggest that one way of regulating would be to issue sanctions.

(a) Do you think that sanctions on owners should be used to enforce regulations?

Yes No

(b) Should owners be able to pass the sanction or obligation on to buyers?

Yes No

We feel it is important to allow people to be able to sell properties they are unable to improve. Compliance could be allowed within a 12-month window but this would need to be enforced.

33. The Scottish Government does not intend to regulate before 2015. The working group will consider what options for timing of any regulation might be appropriate, but, given all the points set out in sections 2.80-2.81, from when do you think it might be appropriate to apply regulations?

With reference to the Fuel Poverty statement target of 2016 we would hope to see minimum standards introduced immediately in 2015, with regular milestones set every 5 years thereafter (being long enough to gather data on progress, short enough to keep in focus). This would align with the targets set for CO2 reduction for 2020 and 2050.

34. (a) In Section 3.4 we describe the range of legislative and policy levers that we believe are available to help us transform the financial market such that it values warm, high quality, low carbon homes. Do you agree that this is the full range of levers?

Yes No

34. (b) Can you suggest any other ways to help transform the market for more energy efficient, sustainable homes?

- Better presentation of information at point of purchase/let
- Apply Council Tax Discount to all properties that have achieved their potential – when Council Tax is increased / reviewed
- An incentive could be introduced within the Land and Buildings Tax replacing stamp duty in 2015 so that homes that comply with the Standard are taxed at a lower level than those that do not. Part of the tax could be reclaimed by the buyer if they achieve the Standard within year 1 of ownership
- Review legislation relating to clean air act and urban biomass to allow for approved appliances for district heating to multiple homes

35. What changes would be required to current survey and lending practice to enable mortgage lenders to take account of the income from new technology or savings on energy bills?

- Training to surveyors to take account of renewable technologies present and assess the income/savings from these
- Training to lenders to take account of additional income and/or savings resulting from renewables when assessing for mortgage

36. Section 3.15 lists a range of challenges that may prevent the benefits of a more sustainable, energy efficient home being fully recognised in its value. What further challenges, if any, need to be addressed?

- Effective engagement with householders: make it interesting
- Giving greater priority and attention to behaviour change to adapt to the improved home and maximise benefits of changes. Follow-up required to monitor progress
- Engaging with people's values, feeling good about themselves and their actions. For example rather than 'saving money' 'getting what you're entitled to. Exploring other motivations that lead to changes of attitude and understanding, rather than one-off action.

37. (a) Sections 3.16-3.22 set out the action that Scottish Government is currently developing to encourage greater recognition of the value of sustainable homes. Do you agree that this action is appropriate?

Yes No

37. (b) What further action is needed to influence consumers and the market?

- Milestones should be more ambitious – and set every 5 years
- They should clearly be related to achieving the fuel poverty and emissions reduction goals
- Support is needed to match appropriate funding to measures, and this support needs to be free, and easy to access

38. What steps can we take to ensure that we design and develop sustainable neighbourhoods?

- Energy review as part of planning process for new build and alterations
- Aim for best practice standard, rather than minimum standard
- Incorporate renewables into all new builds. PV as minimum if appropriate
- Building regs to apply to each element of building rather than the whole, so that one cannot be used to compensate for the other e.g. at present extra loft insulation can be used to compensate for heating system having minimal controls, no room thermostat, or no domestic hot water programmer
- Increased support and incentives to ensure more district heating capacity

39. Section 4.10 sets out the main challenges to address in taking forward our aim of new build transformation. What further challenges, if any, need to be addressed?

Research should be undertaken to investigate whether builders in Scotland are charging a premium for better energy performance compared to the rest of the UK. If this is the case greater transparency in procurement should be sought, market awareness raised and additional contractors encouraged if the market is being distorted.

40. What action is needed to increase the capacity for developing and bringing to market innovative methods of construction?

No comment

41. What further changes to the operation of the Government's affordable housing supply programme would help to enable it to champion greener construction methods and technologies in the medium term?

No comment

42. What further action is needed to influence the construction industry to make greater use of innovative methods to deliver more greener new homes?

No comment

43. (a) Has Chapter 5 of this consultation identified the key challenges to ensuring Scottish companies have the skills to take advantage of the opportunities expected to be on offer?

Yes No

43. (b) If not, What other challenges are there?

In the retrofit market, there is a need to develop the energy efficiency knowledge and skills in those who currently deliver building services. This should include architects, building materials suppliers, builders and tradesmen. We should seek to deliver energy efficiency measures alongside general repairs and improvements. As new technologies and practices develop particularly in relation to internal solid wall insulation it will be important to continually train.

44. What further action is needed to ensure there is appropriate investment in skills and training to meet these opportunities?

There are opportunities to access European Funding to support the energy efficiency supply chain. With the changing priorities for ERDF energy efficiency will become one of the main activities. Through the Regional

Delivery Partner there would be the opportunity to utilise the National Retrofit Funding as match funding so increasing the leverage. The brokerage model may also allow ECO to be used as match funding and needs to be further investigated. The development of a local supply chain would also meet the priority of improving the competitiveness of small to medium sized enterprises.

45. How can the construction industry be made more aware of the potential funding and support for skills and training development opportunities and engage effectively with those providing training to ensure that it meets their current and future needs?

The development of a Regional Delivery Body could engage all stakeholders including skills and training providers

46. How do we ensure that skills and training opportunities are provided on an equitable basis to all groups in society?

The development of a Regional Delivery Body could engage all stakeholders including skills and training providers

47. Apart from training and skills opportunities are there any other issues that should be addressed to make employment in construction and other industries becomes more representative?

No comment

48. Please describe any specific difficulties relating to skills and training that apply to those in remote and island areas and your view on how these may be addressed.

The development of a local supply chain in the remote and island areas is particularly important since larger, national contractors are less likely to exploit the opportunities.

The existing building industry, often consisting of individual tradesmen or small building firms, could form the basis for the future energy efficiency installers if the right support is provided, but there would need to be a co-ordinating and/or support body to enable the 'smaller players', who do not have the infrastructure or resources available to them to engage fully.

To enable sole traders and micro-business to participate in ECO and Green Deal opportunities, a supporting framework will be required such as the Regional Delivery Bodies.

With the Highlands and Islands likely to be eligible for transitional European Funding and with its higher intervention rate the opportunity exists to support such activity.