

**4. Please indicate which category best describes your organisation**

**(Tick one only)**

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

Sections 19 and 20 seem to cover the issues well

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

Lack of knowledge of the benefits of schemes such as cavity wall insulation and the perception that they are expensive with very long pay back times

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

Continue the area based approach to insulation measures as that seems to be successful in achieving results

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

Continue to develop solutions for 'hard to treat' property types and make them available through the new Green Deal

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

Where practical expand the gas grid but otherwise maximise the insulation of properties and ensure that appropriate heating systems are available for them.

5. (b) How should these be addressed?

The Green Deal offers great scope for levering in funding for community schemes

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?

The role of local authorities should be to coordinate the range of activities being carried out by energy companies and other agencies to optimise the outcomes for their communities

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

Provide funding for local authorities to coordinate activities and funding for the continuing research into treatments for 'hard to treat' properties.

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

Given the interconnections of the UK energy market it is unlikely that the devolution of additional powers to Scotland or Scottish local authorities would have a significant impact.

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

Continue the area based approach with local authorities utilising their good knowledge of local conditions and having a coordination role.

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)?

Continue the area based approach with local authorities, utilising their good knowledge of local conditions and local people, having a coordination role.

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?

It would be extremely difficult to enforce. Incentives would be more effective than enforcement.

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.

The hierarchy outlined seems sufficient

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

Again, this would be difficult to enforce and has significant affordability implications.

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

It should however not be made a duty on the local authority to do this

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

It should however not be made a duty on the local authority to do this

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

All local authority processes should be simple, transparent and open to challenge. However, the process is not the main impediment. Funding the initial outlay is more problematic.

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

It should however not be made a duty on the local authority to do this, and probably limited to safety and security.

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

Especially where there is a safety or security issue.

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

The powers contained in the Property Factors (Scotland) Act 2011 have yet to make an impact. The time to make further changes would be if they prove to be inadequate

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

Persuasive rather than compulsory. Market forces, ie. cost of fuel will act as an incentive.

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

Possibly for private rented sector, but not owner occupiers.

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

Rising energy prices will do most to influence behaviour, but EPCs could perhaps be amended to try and quantify the market premium that can be expected from reduced energy costs

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

The principles outlined seem sufficient

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

Possibly invoice a Council Tax additional levy if properties remain energy efficient.

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?

The approach outlined seem sufficient

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

Private rented sector only. Applying this to owner occupied sector would prove very difficult to enforce.

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

Restricted to private rented sector.

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?

Older people and those with disabilities may need warmer living accommodation as they are more likely to be static for longer periods than the general population

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

Yes  No

Granting of building warrants for alteration or improvement works could be a further suitable trigger

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

If universally applied, then phased, starting with PRS.

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

If enforcement is to be used to drive up standards then the capacity of local authorities to do this will need to be considered if that is to be the responsible body.

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

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?

2017 would probably be the earliest date from which regulations could apply.

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?

It will be interesting to see the extent to which the Green Deal is used as a funding mechanism in Scotland for improving energy efficiency and whether a market premium does develop for homes with the full range of measures fitted to them.

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?

If a market premium does develop then practice will change to quantify that premium which may be recorded as part of an EPC?

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?

The list provided seems comprehensive

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?

The list of proposed actions seems comprehensive

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

The development of district heating schemes with individual metering should provide lower running costs for households

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?

The ones listed will be quite enough

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

Encourage mortgage lenders to expand the range of options that they are willing to consider

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?

Further incentivise the adoption of appropriate technologies

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

Further incentivise the adoption of appropriate technologies

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?

The list provided seems sufficiently challenging

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

Funding needs to be sustained for Modern Apprenticeships

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 existing programmes need to be constantly publicised with an emphasis on the benefits to prospective employers

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

Monitoring of take up of opportunities should highlight those groups who are missing out. Where the lack of take up is for cultural reasons, that could prove difficult to deal with.

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?

Cultural attitudes in the construction and allied industries have changed beyond recognition over the years, but further efforts need to be made

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.

Bringing together work, training and people is especially difficult in remote areas. Programmes need to be improved so that 'on the job' training is more widely available