

**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 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...Special Health Board</b>	<input checked="" 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

NHS Health Scotland welcomes the broad vision and objectives of this strategy. We recognise that the wider influences of health and health inequality include social determinants such as housing, neighbourhood and community and that addressing fuel poverty and the linked issues of cold, damp and mouldy housing will improve health and will involve targeting those who are most deprived, which may thus impact on the level of health inequalities in the Scottish population.

We would suggest that in order to be sustainable, housing should be healthy and would refer you to the recent reports on housing from the Scottish Government-led Good Places, Better Health initiative. Housing should also be recognised as a key element of neighbourhoods and the communities which live in them.

We are concerned that while the strategy provides a response to the issues of climate change (which we view as a major challenge for public health), it appears to take little cognisance of our longer term reliance on fossil fuels, and their inevitable future scarcity, and actions to address increasing pressure on these resources. There is little discussion of a shift of housing towards energy use from alternative sources, which might be considered appropriate

We would thus submit that a focus only on improving insulation runs the risk of reducing ventilation levels in housing to a degree which allows the build up of poor indoor air quality which may then impact on health. We would also suggest that a focus on making sustainable housing more expensive would lead to a widening of the inequity which Government policy aims to address.

Our work on health inequalities would suggest that the most effective ways of addressing inequality are by introducing structural changes, removing the requirement for people to opt in. This has informed our responses to specific questions below.

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

Evidence from work to address health inequalities has suggested that the most effective actions are targeted at structural issues, and those which remove the need for people to opt in. 71% of British adults said they would consider making improvements to their home to make it more energy efficient. However, more than a third (35%) thought the expense was a key barrier and a fifth (19%) thought it was not their responsibility (Source:

British Social Attitudes Survey 2010).

Workshop discussions linked to the Good Places, Better Health initiative suggested that one of the problems is the complex landscape in terms of grant provision and availability of support. This is reinforced by research for Consumer Focus Scotland (2010) which found that key barriers to introducing energy efficiency measures across all households included:

- Complexities of funding sources
- Complexity of the advice and assistance packages
- Concerns about cavity wall insulation

<http://www.consumerfocus.org.uk/scotland/files/2010/10/Area-Based-Energy-Report.pdf>

There also appears to be a piecemeal approach to recruiting people to undertake the installation of energy efficiency measures with frequent cold calling by telephone, and recipients having no clear idea of the source of the calls. This is a difficult area to navigate for a proportion of the general public, a view substantiated by the fact that 8% of adults don't trust the people selling these improvement and/or don't trust the people installing these improvements to do a good job (British Social Attitudes Survey 2010).

Additional barriers would include affordability for those on tight budgets, literacy and language barriers for those for whom English is not their first language, and also accessibility for those with sensory impairment

The strategic approach and the underlying process would appear to be based on the premise that we need to sell the approach to people, which may be at odds with the needs of the communities themselves.

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

It would follow logically that the most effective way of addressing barriers would be to remove the complex and difficult to navigate system which has emerged and give responsibility and funding to one agency (eg local authorities) to ensure that all housing in their areas is appropriately insulated by an agreed date. Local Authorities would be well placed to prioritise housing in terms of need and to operate a system where householders need to opt out rather than opt into the upgrade of their housing. They may also be considered as trusted agents, and reduce the concerns of the population about employing "cowboy builders". It follows that the upgrades would be free at the point of service and early phases would be prioritised to those most at risk of living in fuel poverty.

Practical solutions would also include ensuring that information is made available in a range of languages and formats (including non-written).

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

Comments See the response to Q3

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

This was one issue which was discussed in the Good Places, Better Health workshops on this area –getting businesses to be willing to travel (particularly to Island communities) to undertake this type of work.

5. (b) How should these be addressed?

Centralising the service and moving to an opt out approach would increase the scale of work requiring to be done which might then make such contracts more attractive to contractors, or the agreed agency could train local residents and companies to undertake the work – thus addressing employment opportunities and ownership of the important process locally. More extensive inclusion of issues should take place, such as micro-generation, considered use of sustainable biofuels (such as sustainable forestry), community windfarms and community heating systems, all of which may be more effective and appropriate in a rural setting. There is learning from the transition town movement which may be of help here <http://www.transitionscotland.org/>

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?

Comments See comments to Q3-5 above,

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

Start by considering the desired outcomes involve local authorities and promote outcomes agreements in this area, and then work out an approach which has a high probability of meeting these outcomes.

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

Comments

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

A complete rethink of the approach in line with the outcomes identified – simplifying the system by making it opt out rather than opt in, and fund through a single, locally accountable scheme.

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)?

We would encourage a move from a consumer model to one in which people would have to opt out, underwrite the approach so that if anything does go wrong or later prove to be problematic (eg earlier use of UFFI foam as a cavity wall insulant leading to higher levels of formaldehyde in housing as this breaks down) people are assured it will be fixed.

See response to Q9 above. If the choice is that the country continues with the consumer mode, it would be important to target information in an accessible format (eg language, non written resources etc) to these groups, and in some cases use a variety of trusted sources of information as agents eg community health staff, community leaders, care workers, etc

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?

Comments

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.

'Hierarchy dependant on geographical location' – thus in radon protection areas in terms of health, it would be important to include the need to take appropriate measures to limit ingress of radon and ensure that it is not captured within the house.

The language of the hierarchy as listed is not particularly helpful – see for example number two on the list – would need some kind of advice on how to ensure that the work is done properly. The top priority probably makes more sense to a housing professional than to the rest of the population – what does this actually mean? The use of the term “micro-renewable technology” perhaps sums up the problem with the list as it stands.

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

There is a need to audit and then to provide services to ensure that work is done – moving to an opt out system would help this process.

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

Comments

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

Comments

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

Comments

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

Comments

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

Comments

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

Comments

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

There is a more general need for policies which encourage sustainable behaviours whilst ensuring equity and positive impacts on health. One such policy is carbon rationing (if accompanied by appropriate safeguards in other policy areas such as housing, transport and rural living). See refs Hillman M, Fawcett T. How we can save the planet. London: Penguin; 2004. McCartney G, Hanlon P. What can health professionals contribute to the challenge of sustainability? *Public Health* (2009); 123 (12): 761-4.

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

Comments

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

Comments

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

Comments Actions now should be sufficient to meet the long term required outcomes in terms of fuel poverty, climate change and healthy housing (warm, dry and mould free)

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

Comments

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?

Comments We would suggest that option 3 appears to come closest to the desired outcomes (rather than inputs). We should also suggest inclusion of consideration of ventilation levels, cost to heat, and dampness and mould levels.

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

Comments

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

Comments

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?

Opt out rather than opt in processes, information in appropriate formats and using appropriate agents and trusted sources, systematic assessment of need. Timing of regulation is important – at point of sale or change of lease where this is more appropriate to the resident of the house.

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

Yes  No

Action will be too slow to meet desired outcomes if the scheme is limited to major points of change – housing turn-over is very slow. A phased rolling programme of audit followed by supported action might be one way to address this. Target areas could be prioritised following analysis of national surveys.

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

Comments All at once, with sufficient lead in time to allow phased retrofit.

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

Comments

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

Comments Sanctions should only be used as a last resort.

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?

Regulation would depend on the timing of the outcome the scheme wishes to achieve – the time taken to achieve the Scottish Housing Quality Standard by social rented sector would give an indication of how much time the considerably more diverse private sector would require.

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?

We would argue that local councils take responsibility for providing this work, so by passing the issue of market activity .  
We are concerned that sustainable, fuel efficient housing attracts a premium, either onto rental or house prices. This could widen inequalities by making such housing less accessible to those who are able to afford the premium.

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?

Comments

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?

Comments

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?

Comments

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

Sustainable neighbourhoods should also be healthy neighbourhoods in terms of community and individual health and wellbeing. The Good Places, Better Health initiative made a number of recommendations to improve the health and sustainability of neighbourhoods and we would support consideration of these recommendations (see <http://www.scotland.gov.uk/Topics/Health/good-places-better-health/Recommendations> )

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?

Practice will only change if it is an even handed requirement of all developers –revising and improving building standards to ensure that new housing meets high requirements would in turn, ensure the kind of reductions in carbon use required for the agreed outcomes.

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

Set high standards, enforced through regulation, and , ensure that housing built now will be future proofed and sufficient to meet the desired outcomes.

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?

Comments

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

Comments

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?

Comments

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

Comments

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?

Comments

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

Comments

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?

Comments

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.

Comments