

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 type="checkbox"/>
Community group	<input type="checkbox"/>
Academic	<input type="checkbox"/>
Individual	<input checked="" 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

Comments

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

Lack of awareness, independent and impartial advice, cost of measures and demonstrable savings

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

Require better modelling software than RdSAP/SAP, detailed research on how to effectively deal with pre 2007 housing stock, particularly the solid walled and system build types. To develop a range of techniques/methods which will work and can be delivered.

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

Clear unambiguous assessment and advice

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

Training local tradesman to be energy aware, ensure opportunities for thermal refurbishment are captured along with routine maintenance, heating system upgrades, home improvements.

5. (b) How should these be addressed?

Building thermal refurbishment manual required

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?

Working to a set of common standards

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

Provide the focus for standards, skills, training and dissemination of information

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?

Low cost finance <2% interest

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)?

Set common standards across all dwelling types

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 Y

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

The EPC although it needs a radical overhaul in its format and the RDSAP method. NHER was by far the better tool as it modelled actual fuel cost and local conditions .

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

Yes Yes?

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

Consider Insulation - Should be putting this as a priority depending on age of dwelling

Properly Ventilated - too simplistic- there is no definition or measure as yet of proper ventilation. Is it 1ach? We need to provide some convenient and non technical way of expressing this as too much ventilation will waste energy. Most dwellings as probably too leaky.

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.

No

Given the dire economic circumstance we are all in it would be inappropriate to make this coercive measure, many people will not have the resources nor LA's to police this. Better to up the adduce and any assistance, such as that given by EST to householders.

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?

Ensure the EPC or whatever system is chosen to rate dwellings uses real numbers and avoid the rating trap, which are meaningless entities.

This will enable householders to reflect on what energy they are actually using, how well their dwelling performs thermally and what they should be trying to achieve.

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

Yes.

Research I carried out modelling existing housing stock indicated that to achieve the 2050 goals we need the following explicit standards not some EI rating.

Table 9.1 Outline of Thermal Refurbishment Standards

	Basic	Advanced
CO2	≤ 30 kgCO2/m2	≤15 kgCO2/m2
Energy	≤100 kwh/m2	≤ 50kwh/m2
HLP	≤1.5	≤1
U Values Roof	≤ 0.15	≤ 0.10
Wall	≤ 0.2	≤ 0.15
Floors	≤ 0.25	≤ 0.15
Windows & Doors	≤ 1.5	≤1.0
Hot Water Tank Insulation	80mm	100mm
Primary Pipe work	30mm	30mm

Not forgetting air permeability

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

Replace with a revised NHER.

RdSAP is a compliance tool it was not designed for modelling; its standardised approach is hopeless when talking to householders as it cannot reflect their true fuel prices and consumption. Therefore the EPC cannot be modified to make it more user friendly.

We need to create a new NHER type software that is meaningful to the local geographic conditions, fuel prices, consumption, occupancy.

It needs to reflect back what the householder is actually using in terms of energy, (KWh/year of each fuel type) the thermal performance of the dwelling, and a range of options that can be applied, form a basic to advance upgrade. Set aspirational goals (see 9.1 above), it may take 25 years to meet all the goals of a low energy dwelling when starting from a low base.

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

Use actual numbers, we are the only country in Europe which uses a standard based on a % of a % CO2

Get real, let's have some proper numbers based on KWh/m2 and kgCO2/m2 to measure performance and set standards

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

Reductions in council tax based on a differential improvement, to enable step by step improvements to be recognised.

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?

I would recommend a minimum desirable fabric performance U values and translate these to insulation thickness for different constructions.

Not sure they can be enforced at point of sale or rent. Lowering council tax would be a real incentive to get work done as its tangible to a new owner or tenant.

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?

No

I do not accept this notion of energy efficiency capacity .

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?

All properties of whatever tenure should be trying to achieve the highest thermal performance practical.

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?

Ensure there is something like EAP 4 (I am not confident about Green Deal) as interest rates potentially too high even with ECO

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

Yes No

Comments

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

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

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?

I would start working up aspirational standards now and make use voluntary, to ensure retrofit work is not done to poor standards, i.e. adding 50mm insulation now when 120mm is the optimal requirement for 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?

Cut VAT to zero on thermal refurbishment measures

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?

Comments

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?

Comments

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

Comments

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?

Convince developers that fabric first is the correct approach only use the bolt on technologies once the thermal envelope has reached its optimum target.

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