

**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 checked="" 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

*Should also issues around peak oil demand/price.  
Ensuring sustainable communities through brown field development & low carbon transport and public transport Strategies.*

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

*Cost / Disruption.  
All easy measures have been done.*

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

*Greater financial, practical help and support*

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

*Best Practice information available.  
Education on ALL heating systems & the use of low carbon technologies*

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

*Education on all appropriate technologies / planning issues / Transport*

5. (b) How should these be addressed?

*Scottish Government Lobbying & Target Setting.*

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?

*Facilitator of programmes and best practice. Assist in unblocking owners who will not improve.*

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

*Ensure longer programmes and greater stability and certainty.*

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

*This would allow more focus on the type of housing stock in Scotland. i.e. tenements.*

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

*Big Carrot. small stick.  
Education.  
Culture Change.*

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)?

*Non disruptive measures considered. Decant provision. Closer connections with community interest groups. Don't reinvent the wheel. Use the one that's available.*

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?

*Local Authority for private property and SHR for public property*

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.

*Combine Ventilation with Insulation, while ensuring the use of healthy materials and systems.*

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

*Private Landlords - Yes, Private owners – No.*

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

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

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

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

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

[ ]

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

*Nothing. Act should suffice.*

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

*Education and Culture change*

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

Yes.

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

Ok.

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

*Longer term programmes with certainty of requirements & commitments*

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

*Depends on detail*

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?

*Remove option 4, as this may require a high energy rated property to undertake further improvements when investment should be prioritised elsewhere.*

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

[ ]

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

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?

*Non disruptive measures investigated. Closer links to existing social community groups.*

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

Yes  No

*Specific Building Control Warrant Applications (major works)*

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

*Phased. Varying standards over time.*

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

*Human Rights Legislation.*

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

*Nothing further*

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?

*We anticipate that elements of the Green Deal will not fulfil their objectives and that the introduction of regulation should be related to the introduction of more effective funding mechanisms*

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?

*Ensure SG meets their strategic housing target for new homes, in the affordable sector with RSL, thus stimulating the market and expectations of tenants and residents.  
Reduction or zero rating on improvement works to existing buildings.  
Ensure revenue value from renewable energy installations is included in the capital valuation of properties.*

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?

*Material savings require to be made by new lending arrangements.  
Positive promotion to available EE mortgages.  
Value of energy savings to be taken into consideration of mortgage offer, as well as income, in relation to any property.*

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?

*Lack of knowledge of property professionals.  
Lack of knowledge of lending institutions.*

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?

*Market high energy users like drunk drivers. i.e. social responsibility.  
Creating a market/demand through Culture Change.*

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

*Appropriate planning regulations to create a neighbourhood with minimal transport requirements to achieve work and life balance. (working near homes near shopping – not separate zones // Bias towards district heating systems & local energy production).  
Green education of Property Professionals.*

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?

*Funding is the main challenge.  
Meeting (or exceeding) the number of new homes identified as being needed within the SG Housing Strategy.  
Ensuring that NB developments provide healthy homes and do not store up future endemic health problems e.g. asthma, either from poor ventilation systems or materials.*

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

*Tax benefits/Grants for research projects.  
Academic/Practitioner knowledge transfer.*

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?

*Increase the current £4,000 subsidy to £6,000+ to enable greater uptake of more suitable measures.  
Remove flaws in the current calculation system for the silver standard e.g. downgrading base specification in order to achieve a 30% improvement.  
Include more flexibility in eligible measures.*

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

*Incentives to both the contractors and clients.*

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?

*n/a*

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

*We need to start the circle.  
Create demand (new homes) to create skill demand.*

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?

*Industry is aware, but need direct investment in house building.*

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

*Change in culture.  
Better training conditions  
Better working conditions*

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?

*Positive Promotion to Female & Ethnic groups.  
Change in culture.  
Better training conditions  
Better working conditions*

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.

*Cost of travelling for training & work.  
Addressed by better use of Broadband to facilitate training.*