

4. Please indicate which category best describes your organisation

(Tick one only)

Executive Agencies and NDPBs	<input type="checkbox"/>
Local authority	<input checked="" 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 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

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

We believe that the primary barrier is cost. Additionally we believe that a lack of knowledge or understanding of options has an impact.

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

For cost issues we suggest that the Scottish Government and Local Authorities should facilitate grant access for owners.

For example Renfrewshire Council has been able to cover the additional cost of the insulation through CERT/CESP for the owners in planned external works. It is RC's preference when undertaking external works that we include an upgrade of insulation.

There is some dubiety as to whether we can include insulation as an upgrade under the Tenement Act however we have been able to make available 100% grants for the insulation upgrade, through actively engaging with the potential funders. We hope that the new funding regime under ECO and Green Deal will continue to allow us to access levels of grant that will make External Wall Insulation an attractive addition to the specification.

For knowledge we would suggest that the Scottish Government continues to provide impartial advice service through the ESSac network.

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

We believe that the impartial advice service offered through the ESSac network is a well established and effective service. We believe that this service should continue to receive the support it does from the Scottish Government. An advertising campaign that highlights the diversity of advice available might be appropriate, expanding on the insulation ads. Increased level of grants will help in the uptake.

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

N/A to Renfrewshire

- 5(b) How should these be addressed?

N/A to Renfrewshire

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?

As mentioned above the most achievable change, we believe is that External Wall Insulation should be specified in all external planned improvements over mixed tenancy blocks. Encouraging new technology and publishing case studies will help give confidence to the construction industry, developers and residents.

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

As stated we believe the Scottish Government should continue to support the services from the ESSacs. As a LA we would also appreciate clarification in our ability to include improved insulation specification in any external improvements.

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

Devolution of powers to the Scottish Government or to Local Authorities will enable targeted problems to be resolved and specific local needs to be developed.

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

The cost of the improvements is substantial but grant assistance and financing will be available through Green Deal and ECO. Therefore we suggest that the most appropriate action available to the Scottish Government is to introduce more stringent requirements on the energy standards of new and existing homes. It may be possible to ensure standards are enforced at point of sale.

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)?

It is important that the services offered by the ESSacs are integrated with additional services such as those offered by Help the Aged and the MacMillan Nurses. These services need to be expanded further to include groups which specifically engage with ethnic minorities. In Renfrewshire Council we have supported an Energy Advocacy service providing face to face energy advice and support to vulnerable households. We have recently enhanced this service by integrating an ethnic minority targeted service.

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

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

One option may be to consider homes are subject to an EPC at point of sale or let and that any homes that fall short of a standard are highlighted as such. There is already legislation coming into force for the rental market. We believe that it is appropriate that home buyers are provided protection under law that their purchases are fit for purpose and of an acceptable standard. However we do appreciate that this will be difficult to enforce and exceptions should always be considered.

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

Yes

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

We believe that point 2 should be moved to point 5 and all other points moved up.

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

As stated previously we believe that insulation should be included in improvement works that can be instructed in the same way as repairs.

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

Cost should be recoverable from the property owners; therefore any payment from the council would be short term until the monies are collected from those responsible for them. Local Authorities would need a safety net regarding the finance e.g. Belwin type finance scheme to ensure Local Authorities are recompensed should payment not be forthcoming.

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

The council should be in a position to issue work notices if required by the community. We believe that any work notice to undertake works should be automatically followed with a maintenance order to ensure good practices are followed thereafter. We would highlight that though we are supportive of this we recognise that there are issues with the ability of the Local Authority to resource this and for the householders to finance it.

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

We believe that by including a maintenance plan with a works order we are offering an enhanced service and clear guidance to householders. This will allow a Local Authority to adopt a standard form which may be recorded on the land register. This will ensure a consistent approach across Scotland.

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

Setting up an HRA is complex so any option that allows LAs to address issues of amenity, security and safety without establishing a HRA is welcomed. This will allow us to focus on resources on to the properties identified as being most at need.

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

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

In respect to the actions undertaken by a Local Authority to rectify poor building maintenance it is those buildings without factors that represent the greatest challenges. However we do support clarification on the responsibilities of factors and homeowners and the strengthening of the home owners rights of protection.

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

There should be a greater emphasis on the EPC and the projected running costs of a home at point of sale or let. This may be achieved by introducing a statutory requirement that all property advertisements should include the EPC rating.

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

Yes, with an initial focus on the private rented sector.

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

We suggest that the EPC should form the 1st page of any property report.

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

One option may be to consider that thermal improvements are deemed to be statutory requirements at point of let, sale or major upgrade.

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

We do not support the use of legislation to define incentives that Local Authorities are obliged to offer. The scheme referenced in the consultation document (council tax discounts for energy efficiency) has suffered from poor uptake because this has almost invariably not been the best offer available to householders. Given the dynamic nature of the energy efficiency domestic grants, particularly at the current time when we are moving from CERT/CESP to Green Deal/ECO where so many details are yet to be defined, we would not support further legislation to Local Authorities to offer specified types of deals.

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?

We believe that options 1) and 2) are over-prescriptive and do not necessarily deliver the most appropriate solutions. We would suggest that any specification should be based on performance and not measures. We therefore support options 3) and 4). We would suggest that the goal of the Scottish Government should be to move our retrofit standards towards higher airtightness and insulation levels through a stepped process e.g.(Passiv haus retrofit standard, EnerPHit)

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

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

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?

If we are to move towards greater energy efficiency standards, ultimately we will be looking at renewable technologies as solutions. It is essential that any assessment that recommends a renewable technology considers the occupancy levels and occupants when suggesting a suitable technology. As mentioned above we believe that there is an important role for the ESSacs to play in delivering Energy Advocacy.

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

Yes additional triggers to be developed.

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

Following on from the 2016 Private Rented Sector standard that will exclude any properties below an EPC level G to be rented, lessons should be considered when the effect of this has been gauged.

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

As previously stated the availability of grant assistance for energy efficiency work is in a state of change. We do not think it is appropriate to be over prescriptive at this time. Despite more offers being available through Green Deal/ECO, they will be extremely complicated and many of our householders will struggle to understand what is being offered. We do not think it would be appropriate to enforce such vulnerable households into contracting through Green Deal.

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

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

No

We suggest that standards are enforced at point of sale.

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?

Regulations for all housing sectors should synchronise, i.e. they should match the planned upgrade of Registered Social Landlord stock through EESH and subsequent proposed standards.

- 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

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

With the introduction of Green Deal and ECO there may be major changes in how the energy efficiency work in homes operates. We suggest that the Scottish Government should monitor and review what impact GD/ECO has on the market over 2013 before developing any further ways in which it may transform the market.

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?

Low carbon, energy efficient homes, including those with micro-generation technology, do not currently attract favourable lending terms or higher property values. An awareness and education program is required for lenders.

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?

Communication and education involving communities at an early stage may help to address these challenges.

- 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

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

We believe that the use of building regulations and standards is adequate in terms of

regulation however we think there is a knowledge gap to be filled. We suggest that in addition to the proposed changes to regulations that an education and or public information programme is delivered. It would be appropriate for such a programme to draw references and examples from the Scandinavian housing sector.

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

We recognise that in developing sustainable neighbourhoods there are a wide variety of issues to be considered. Planning guidance already directs architects to consider many of these issues. The Council's Planning and Transport Department would like to consider option to ensure appropriate outcomes are achieved.

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?

One of the major challenges is to ensure that high quality housing is built in line with community requirements. There is a small and specialist housing market for modern designed housing however the general market remains much more conservative in its tastes. As Local Authorities we should encourage creative and innovative design.

One way that local authorities can help in this is by installing renewable energy generation technologies where appropriate and practical in its own stock, as many Local Authorities already do.

We also believe that there is a need for education as mentioned above.

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

We would suggest that a stepped approach is best adopted in recognition of the level of resistance to change existing in the construction industry. We would suggest that some of the steps to consider are these outlined below.

- 1) One option is that a planning requirement should be introduced that all houses are orientated to the South unless justifiable not to do so.
- 2) Design to Passiv haus standards
- 3) New estates should be designed around district heating systems.

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?

The Scottish Government should consider the German model for new build where the additional cost of renewable technologies/Passiv Haus standards is covered through a 10 year low cost loan attached to the properties. Green Deal may be appropriate to be considered as an option to fund renewables in new build.

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

The Council's Planning and Transport Department are considering these option but inevitably more legislation and consideration of the whole cost of carbon need to be considered.

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

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 support the proposals drive to resolve issues between procurement and local employment initiatives.

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?

Greater specific legislation to ensure standards and targets are met with specific training requirements will engage the construction industry.

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

Communication and ensuring readily available access to training required will help in ensuring training opportunities are provided on an equitable basis

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?

Renfrewshire Council work closely with it's communities and suppliers, through its procurement process, to ensure that employment is at the heart of our activities.

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.

Not applicable to Renfrewshire.