

**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 checked="" 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  No

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

Cost of measures ; understanding of measures and financial incentives available.

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

There must be more engagement with installers. Energy Saving Trust research has shown that the majority of householders rely on the advice of their plumber, electrician etc when installing replacement heating systems.

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

A range of "carrot and stick "measures may help. Grant support limited to either time or sum tied in with the use of properly qualified installers.

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

5. (b) How should these be addressed?

Comments

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?

LA's in particular do have a role to play as they have the local knowledge to advise on methods of communication to householders etc. However there are dangers if LA's are involved in contract arrangements for such work. In our experience these contracts tend to be packaged in such a way that small firms can't access contracts. The model used for the boiler scrappage scheme whereby the customer can choose their own suitably qualified installer is the way in which such funding should be made available.

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

SG should be seen as the "Information Hub" for consumers. Consumers are more likely to accept the authoritative comments made by SG than any third party.

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?

Comments

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)?

Comments

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.

I would suggest that item 2 should be moved to number 1. It is fundamental that any work is done properly.

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

Not sure that poor energy efficiency can be a trigger for a work notice. Has to be more about education.

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 out with 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?

Easier tools to use to show fuel savings. The key issue is to show how much these products will save.

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

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

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?

Comments

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?



Comments

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?

Comments

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?

The Building regulations are structured in such a way that they can be adopted to reflect new products and methods of installation but both installers and customers need to be convinced of long term benefits/savings.

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 greener new homes?

Most decisions are based on cost! Developers/home owners need to be convinced that such methods actually save money. The message has to be altered to reflect the market. I.e. some people will want "greener homes" as an environmental message whilst others simply want to save on their fuel bills.

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?

It has to be remembered that the majority of renewable or green installations will be undertaken by an already existing workforce! Plumbers, electricians etc can and are already being up-skilled to install such products. Such training is already part of the Modern Apprenticeship in Plumbing and many plumbing operatives have completed additional training.

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

Firms have to be given support in funding training and then in ensuring that they will have a fair opportunity to bid for work. They will not invest in such if they see no potential return and it is therefore vital that the work opportunities are packaged to reflect the industry. Over 80% of our members employ 5 or fewer operatives and over 90% of apprentices are employed by this same sector!



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?

Via trade bodies.

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

See 43.

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?

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.