

**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 checked="" 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...</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

Comments

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

Would suggest the main factors include; capital cost, competing priorities, inertia, lack of awareness of benefit of energy efficiency measures, lack of understanding of what energy efficiency measures can be applied and how, general suspicion/distrust of grants and offers, short term availability of grants, complex grant criteria and application process (whether perceived or real),  
Another influencing factor can be the "pay back" period. For example; if the average owner stays in their home for 10 years then they are unlikely to want to invest in a measure with a 20 year pay back, , unless there is some other more tangible benefit, e.g. heightened levels of comfort, slower deterioration of the property, enhanced on-sale value etc.

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

For the basic insulation measures such as standard loft and cavity wall insulation (and underfloor) create a single national universal grant offering these measures free to all, and make it available for a sustained period of time (eg 5 years ?). Having a national grant, backed by the Scottish Government, available to all over a number of years would have direct benefit in reducing a few of the barriers highlighted above. Promotion would be easier, local authorities could develop longer term plans to encourage uptake across their area. There would be better opportunity to engage others not directly involved in promoting energy efficiency to "spread the message" i.e. third sector workers, housing visitors, social services, financial inclusion workers, front line staff, trades workers, amongst others. Improved advice and support from trained advisors allied with raising profile of energy efficiency with workers dealing with public.

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

Easily accessible, good quality guidance and support, specific to the householder and their property. This would be of particular benefit for homeowners whose homes are not suited to standard loft and cavity insulation, and for those looking to install new heating.  
i.e. how to guides, technical solutions and information, localised case

studies, cost appraisal with clear costs (capital and lifetime) and benefits etc.

Provide ongoing support and advice for those who plan to proceed with measures. Again to encourage homeowners to install more complex measures or those that have higher cost then a degree of “handholding” could be offered to help provide confidence to proceed

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

Higher Delivery costs - Transportation costs are likely to have an adverse effect on the distribution of materials and labour supply to rural areas. Market reluctance to target these areas, lack of local contractors who can deliver works through grant system.

5. (b) How should these be addressed?

Provide route for local contractors to be employed to deliver measures required. Funding to help with material delivery and/or solutions to minimise this cost ( i.e. storage containers).

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?

Local Authorities should be playing a pivotal role in developing and helping to deliver schemes in their area, working in partnership with various stakeholders from all sectors. The extent of this role would vary depending on the requirements for housing in the area.  
Take lead in delivering improvements to own stock and demonstrate best practise. Share experiences.  
Use ‘void’ period to improve house to appropriate standard.

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

Potentially the Government could offer Local Authorities a solution that minimises the procurement process and the issues surrounding procurement i.e. framework agreement for installers/suppliers/.

The government should also provide strong technical support for installing measures. The type of energy efficiency measures we will need to install to meet targets are going to be more complex and housing stock owners will be less experienced in these areas, therefore there is need to provide information to give confidence that correct, and most sustainable solutions are being applied to the property.

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

Allow greater control of budget and funding?

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

A rebuild programme is a further solution to help help improve the overall quality of housing stock. .

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)?

By ensuring appropriate and accessible communication techniques are used. Ensure messages/schemes are kept straightforward to interpret. Engage with other sectors in particular the Health Sector.

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 X No

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

A National Enforcement Agency,

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 X

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

Agree with order 1-2 and 5-6, but think 3 should be priority before 4.

Point 5 wrongly assumes all houses will have a boiler heating system, suggest it should read along the lines of > Ensure existing heating has appropriate controls, and is being used efficiently and cost effectively.

Suggest an additional point to cover the choice of heating systems i.e. When heating needs replaced, appraise all options before deciding on new system (don't assume like for like)

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

Yes, with additional powers for recovery of monies and government support.

When a Local Authority serves a Works Notice this brings enforcement powers. If a local authority is not in a position to follow through on the enforcement then it is pointless to serve a Notice in the first place. Where works are enforced the Local Authority must pick up the tab and endeavour to recover costs. As the current method of recovery, the Repayment Charge allows up to 30 years for repayment, Local Authorities could find themselves having to bankroll the entire retrofit programme. Using the Governments own figure of £7,500 average cost for each home in Scotland to meet targets, the cost for Aberdeen City is circa £825m. Clearly this is unachievable, albeit a good deal for homeowners with current low interest rates which would be set for 30 years under the terms of the Work Notice.

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

This would seem a logical option as Councils already have power under the 2006 Act to serve a Work Notice and enforce the works. This option would remove the need to serve such a notice where an owner freely admits that they have no objection to the works being carried out but are unable, for whatever reason, to source adequate funds to pay for the works. Any outlay would have to be recoverable through a Charging Order. However, it may have limited uses as the local authority may still prefer the option of serving a Notice in order to satisfy ourselves that any absent owner is fully aware of the consequences and has had an opportunity to comply, or object through the proper channels.

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

The fact that a Local Authority has had cause to serve a Work Notice tends

to suggest that there is a failure within a tenement to co-operate with the repair and maintenance of the tenement and the use of a Maintenance Order immediately after the Works Notice is complete could prove beneficial in promoting a factoring service, even if it is self factoring, as this will be taking advantage of a heightened awareness of the need for maintenance rather than belated repair.

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 X No

The current process for serving Maintenance Orders requires to be streamlined. The need to serve notice against the Title Deeds at every stage is cumbersome, costly and time consuming. Repayment Charges also need to be amended in order that the local authority can determine the pay back period rather than the statutory 30 years as at present. It may be more appropriate for a 5, 10 or 15 years to be stipulated dependant on the size of the debt. It may also prove beneficial for the Council to be able to seize and then sell the property in order to recover our costs in a much earlier timeframe.

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 X No

Aberdeen City Council disagrees with proposal a. to issue a work notice on properties affecting the amenity and also disagree with option b. on safety and security.

The former is an issue which can be resolved with the use of a Maintenance Order, and is probably the more appropriate course of action as it makes the maintenance an ongoing matter for the owner, (up to 10yrs) as opposed to a one of fix which then has to be repeated further down the line, (although maintenance order processes do need to be streamlined). The latter is an issue which the owners of a tenement have powers to resolve themselves through the Tenements Act. For local authorities, there are more pressing issues with regards to repairing the fabric of tenements without getting involved in door entry systems. The Work Notice should remain as a tool for Repairing properties as opposed to Improving them.

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 X No

Aberdeen City Council agrees with this proposal as it is a major concern when dealing with tenements where the ground floor property is a commercial premise that carries liability for the major proportion of cost to repair. When finances are seriously limited, as at present, an inability to secure the return of what can be a substantial amount of money, can influence decisions on whether or not to serve a Notice in the first place.

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

Aberdeen City Council supports both options 2 and 4. While option 4 will make a significant difference for a few, it is not a solution to all issues. Option 2 will be useful in helping to focus attention on all future factoring setups and should assist owners within existing schemes to resolve unsatisfactory factoring issues more effectively.

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

Legislation at point of sale or rent that would prevent that process being completed, without intervention by property owner, or a penalty for non-compliance..

Estate agents could do more by highlighting the energy running costs. Maybe legislation could play part in this, while EPC rating gives a guide to general energy performance of property. The information from the EPC might have greater impact if used or highlighted differently, instead of displaying the band rating of property perhaps the annual heating cost should be shown more clearly, highlighted better as this is what will be of more interest to mass market. i.e. could be requirement that the heating cost has to be shown on property schedule and/or on any advertising of properties for sale or rent.

Also there is so much information in the market place that the Council believes that it is possibly confusing to most homeowners. Clear, simple and practical guidance from the Scottish Government could go a long way to helping owners understand what the issues are for them, and what best meets their requirements, within the limitations of their budget.

A change on balance of emphasis between the carbon emissions and global warming, and general energy efficiency, and more weighting toward the clear benefits to the homeowner, such as enhanced comfort levels within the home, potential for reduced condensation and cheaper fuel bills.

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?

Include a thermal image photograph of property? Although this may be issue over the summer months where the right conditions may not exist to provide accurate representation..

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

The availability of grants and incentives i.e. the carrot and stick balance!

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 X 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 X 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 X No

renovations, extensions, major improvements/building 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

Comments

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

Fair and proper penalties need to be enforced, however this would require investment in resources to allow this to happen.

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?

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?

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