

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 checked="" 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 No

Yes as this tackles old and new housing, housing markets, skills and training.

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

Information, advice, access to realistic grants/funding to install energy efficient measures. Particularly, lack of readily available information on realistic energy efficient measures relating to either insulation or heating. A further barrier to improvements is associated with the age or type of the PRS stock, which can pose physical challenges to how it can be altered to meet energy efficiency standards. The local authority, working with others who have specialist experience of altering older properties, such as Historic Scotland, has a role in providing advice and guidance on the most effective and efficient way in which alterations can be carried out. Importantly though, the energy efficiency of a property is not just associated with its physical attributes, it is also linked to how a property is used, and the tenant plays a large role in this. Ensuring the tenant understands how to use the heating and make best use of it is as important as providing the heating system itself.

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

It is recognised that information is available via ESSacs but this also needs sector based support through SFHA & COSLA plus more grants. Guidance on what solutions work where and in what property types is especially important? A library of past knowledge and good practice when choosing and installing energy efficient measures should be set up. A Library of grant funding streams available to tenants and owners for energy efficiency measures is also required. A system should be set up where owners and landlords can be rewarded (e.g. removal of VAT burdens on any work carried out) and/or accredited for installing measures and for sharing the knowledge they gained. Increase the uptake of grants by ensuring information is easy for tenants and owners to engage with.

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

Investment and returns advice (Pay-back) plus grants. As above.

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

Better access to fuel and heat sources and advice on relationship to various house types e.g. solid walls. Smaller communities are unable to benefit from bulk procurement economies of scale. It can be more costly to engage with dispersed communities.

5. (b) How should these be addressed?

Create local clubs to pursue fuel and heat sources e.g. wind farms & advice. Provide support for the set-up of bulk procurement organisations for small and dispersed communities to ensure they can enjoy the same economies of scale as larger settlements. . Additional funding to aid the dispersal of information and advice on the need for energy efficiency measures.

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?

Carry out Pilot Schemes to show what to do and act as agents for retrofit to get economies of scale in contracts. Ensure a retrofit programme is managed on a community wide basis rather than piecemeal by RSL/Owners and RSLs separately.

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

Support Pilot Schemes and give an administration grant to help LA's be agents. Provide adequate funding levels to allow all in the community to engage with energy efficient measures. Provide an award scheme to acknowledge good practice.

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

Difficult to answer unless this meant more money flowing in.

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

Advertise good examples of change – show cost savings, pay backs. Ensure sufficient funding mechanisms are available to make the changes

required.

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)?

Look to some form of prioritisation and use OT services to advise on needs. Use could be made of local support groups to ensure the dispersal of information to ethnic minority groups and vulnerable members of the community.

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?

Via HO Regulator & PRHP & possibly linked to landlord registration for PRS

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.

Need to add in Safety in the Home.

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

Again, why not as there must be a minimum standard? However, it may be better if an independent agency pursued all tenures. SHR powers could be extended or could use the PRHP?

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

Role for PRHP and Home Owners Panel to pursue.

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

If Local Authority have that power re the work notice in the first place, yes but PRHP can and does do work on this.

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

Should be clear what is needed, to what standard and to what timescales.

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

Local Authorities have a wider sustainability and community responsibility here and should do this.

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

Again yes but only if all earlier steps are clear and laid out with timescales and standards of work.

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

Better regulations and control.

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

Make it part of the lease. Programme of education for owners and landlords to raise the profile of energy efficiency. Checklist of actions at purchase/letting including estimated energy savings?

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

Absolutely yes and should reflect what is reasonable to do.

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

Yes. If simple measures are required to boost the EPC rating then these should be made mandatory.

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

There needs to be clear penalty structures – with teeth or else this will be ignored.

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

Link certain incentives to certain regulations. Stiff penalties for non-compliance with possible discounts for good practise (reduction in council tax).

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?

These are all reasonable but who decides on what to do.

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

Definitely as some private lets are very isolated and old.

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

Yes, allowing for age and location

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 it were possible – introduce an affordability clause.

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

Yes No

Yes, if there is a programme of renewal or rehab to take place.

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 - Year on year increase in the lettable energy efficiency standards.

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

Enforcement penalties are key although need to be fair and equitable in application. Need to consider what appeals mechanisms are introduced and who adjudicates on these.

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

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?

1st April 2015

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

Not many here – need to be clear what the levers are and how to work.

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

Yes, what about an Awards Scheme for Housing Providers e.g. by Green Appointment. Careful regulation of the insulation and renewable industry to ensure tenants and owners get what they pay for.

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?

Need to address the potential for such technology in surveys. Energy efficient homes could attract a higher valuation.

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?

General lack of interest in doing anything about this – need to incentivise. Benefit of living in an energy efficient home should be made obvious – great property value and discount for council tax – provide obvious financial incentives for change.

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?

Publicity and advertising of steps to take place to improve housing.

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

Push through Community Planning & Health Sectors – the benefits need advertising.

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?

Need to look at housing design and architects drawing up designs.

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

Look for Champions for specific designs.

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?

More investment as limited money means stretching the pound and cutting out add-ons e.g. E.E

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

Procurement clubs be set up to cut costs of provision of green facilities.

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

Partly – Need links to colleges here.

43. (b) If not, What other challenges are there?

As above.

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

Support Apprenticeships and College Support.

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?

Need better publicity and closer links with the industry.

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

Put that into contracts of employment.

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?

Look at the facilities offered at training and on-site.

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.

Travel issues can arise and expense of this – need to subsidise.