

**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

Aberdeenshire Council is broadly supportive of the strategy. A ten year programme allows local authorities to plan strategically about how it will tackle the energy performance of the private sector housing.

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

- High cost in installing measures to tackle hard/expensive to treat properties
- Lack of trust/faith in utility companies and installers
- General apathy regarding energy efficiency, even when measures are free.

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

Area based insulation schemes where measures are free. The schemes should be led by the local authority as generally, residents trust the council and are more likely to engage in such schemes.

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

Residents need to trust the organisation that is leading on the insulation schemes. Levels of engagement within UHIS areas are currently high. An extension of UHIS in 2013/2014 would be sensible to allow local authorities to offer loft and cavity wall insulation to those residents that have not yet had the opportunity to participate in the scheme. This will also prevent the momentum from being broken.

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

The suitability and cost effectiveness of measures particularly in older hard to treat housing in off gas areas.

5. (b) How should these be addressed?

More research is needed into the success/failure of specific products for various archetypes of housing. There needs to be a more cohesive approach to sharing information between housing providers. This is possibly something that the SHBVN could support for a short period of time, say two years.

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 play the lead role in the delivery of the NRP. It should however be noted that this will have resource implications for local authorities. The delivery of programmes that will form part of the NRP will be more resource intensive than UHIS due to the type of work that will be carried out through the NRP; project managing solid wall insulation schemes will take far more time than project managing simple loft and cavity wall insulation schemes.

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

The Scottish Government needs to ensure that utility companies invest appropriate levels of ECO funding in Scotland to make Scotland an attractive place for them to invest. The success of the NRP is dependent of ECO funding.

Clarity on how the 200M funding pot will be made up in 2013.2014 would be appreciated. Officers of the Scottish Government have stated that 120M will come from ECO and 65M will come from Scottish Government investment. Where the remaining 15M will come from is not clear.

The Scottish Government should also carry out and publish information required on the levels of investment that homeowners and private sector landlords will need to invest in their properties should regulation be implemented. Consideration must be given to how homeowners and PRS landlords are to fund this investment, given that most local authorities are unable to offer financial incentives through their Schemes of Assistance and how receptive homeowners will be to Green Deal remains unclear.

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

No response.

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

As per previous comments - a local authority led area based insulation scheme that is free to all with a single point of contact.

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)?

Joint working with Community Planning Partnerships who already have existing links with vulnerable groups.

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?

It would not be possible for local authorities to enforce such a standard without additional funding being made available.

The wider economic implications for homeowners/PRS landlords need to be taken into consideration before such a standard is considered. If renting out a property becomes no longer viable, the PRS landlord will either increase the rent or pull out from the sector all together which may have wider implications for social housing providers.

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.

It would also be useful to include information on behavioural change.

Local Housing Strategies should be looking at behavioural change and how it can encourage homeowners to take responsibility for the repairs, maintenance and improvement of their homes.

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

As previously stated, some kind of cost analysis should be carried out on the levels of investment required by homeowners and PRS landlords and consideration as to how individuals will obtain this funding.

Analysis of the number of local authorities that currently use the existing powers of Work Notices and the number of Work Notices served would also be useful. Aberdeenshire Council understands that these powers are not widely used.

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

Any additional duties for local authorities will need to be adequately resourced.

These powers should be restricted to repairs and should not cover improvements. It would not be advisable for local authorities to force homeowners to have expensive insulation measures installed to their own properties, especially when these measures can cost in the region of 25k per property. A realistic and pragmatic approach is required which takes into account individual homeowner's ability to fund such measures.

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

As previously stated, analysis of the number of local authorities that currently use the existing powers would be useful. Aberdeenshire Council understands that these powers are not widely used.

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

As above.

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

Not all local authorities have funding in place to implement existing powers. Whilst it would be useful to have existing powers extended, this needs to be funded appropriately.

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

This would allow those local authorities who have used the powers to be able to recoup their full costs.

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

Yes, the procedure should be made simpler for those owners that may wish to do so.

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

This will require a behavioural change in attitudes which needs to be aligned with Local Housing Strategies and local authorities' Schemes of Assistance.

Owners and tenants need to recognise the importance of having an energy efficient house which will not only reduce carbon emissions but also reduce fuel costs.

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

The impact of the introduction of such standards requires careful consideration. The extent of regulation needs to be provided in more detail before a fully considered response can be provided.

Additional regulation in the PRS may mean that landlords will either increase rents or remove themselves from the sector if it does not remain

financially viable. This will then impact on social housing providers.

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

Standard occupancy needs to be detailed. Standard Occupancy is based on the assumption that a property is heated to 21 degrees in primary rooms and 18 degrees in secondary rooms for 9 hours per day Monday to Friday and 16 hours per day at the weekends. For many this is more hours that they can actually afford.

There is an element of advice to the occupiers but it is at the bottom of the EPC. This section needs to be more prominent and some type of information should be included to give further explanation.

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

The draft strategy appears to have captured the key principles. Incentives should come first before an appropriate set of equitable standards are introduced.

Green Deal is an unknown at the moment and its impact is yet to be determined. Homeowners and PRS landlords need to be given sufficient time to prepare for the regulation.

Consideration needs to be given to those landlords in the PRS who own more than one property. For example, estate owners who contribute to meeting housing need in rural areas. A sufficient lead in period must be given and consideration of extending the timescales for the landlords who own several properties should be given.

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

Area based incentives prior to regulation would support the uptake of insulation schemes. Incentives need to be introduced prior to any regulation.

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?

Aberdeenshire Council fully support option 1. Further detail is required on the other three options.

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 X

Whilst it would be the desired outcome it is not realistic or attainable to expect the private sector to meet the same standards as the social sector. Significant levels of investment would be required and it is not clear where the homeowner would be able to obtain the funding.

Regulation may impact on increased rents in the PRS. The landlord will always seek to recoup their costs. This could result in rents becoming unaffordable and increase demand on social housing.

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

N/A

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?

Continue to work with Community Planning Partnerships who already have existing links with vulnerable groups and will be aware of the issues to be addressed.

Fuel poverty may affect people living in rural areas more than those in urban areas.

Problems accessing finance will be preclude some people from carrying out essential repairs and maintenance to their homes.

Take account of language barriers within the Minority Ethnic community and low literacy levels within the Gypsy/ Traveller community.

People with disabilities should have the same rights to access to the programme as everyone else.

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

Yes  No

It would be sensible to include triggers where a property is undergoing major structural repairs.

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

The PRS should not be targeted first. PRS landlords in Aberdeenshire frequently inform officers that they feel there is too much regulation aimed at them. The PRS is playing an increasingly important role in meeting housing need in Aberdeenshire and we would not want to see this reduced.

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

How the enforcement will be resourced needs to be considered. Local authorities would be unable to do this within existing resources.

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 X  No

(b) Should owners be able to pass the sanction or obligation on to buyers?  
Yes X  No

Appropriate sanctions are necessary for regulation to be of benefit. Additional enforcement will need to be adequately resourced which may have implications for local authorities.

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?

Homeowners and PRS landlords need a suitable lead in period to allow them to prepare for any regulation. PRS landlords who own several properties should be given longer to allow them to meet the 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  No

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

A change in behaviour from homeowners is required for the market to be transformed. This will not happen overnight and will require a shift in attitudes. The introduction of EPC ratings being displayed on adverts should help raise awareness of the energy performance of a property.

Scottish Government policy needs to focus on how this behavioural change will occur.

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?

As stated above, this change will occur through a culture shift with homeowners placing more emphasis on sustainable housing. Market forces will come into play.

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?

RICS not valuing sustainability in homes.

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?

- Additional marketing/advertising of the Green Homes Network
- Expanding and building on the “Greener Together” Campaign.

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

In environment terms: Is there an opportunity to link improved design and sustainability with community pride and need in terms of encouraging communal space (even the taking over of communal space) where maintenance is the responsibility of households and a charge / factoring cost to them. This could have a number of benefits in terms of the removal of Local Authority responsibility for maintenance process and cost, whilst providing a local community focussed use of land – for community benefit (i.e. play parks, allotment, green wildland use, or garden and club use – e.g. scouts, jogging, cycle, etc.) Safeguard would have to be put in place to ensure appropriate use and reasonable sustainability, perhaps by application of a proportionment of use rule or the like.

Could developers be encouraged to go further in provision of green spaces in developments – i.e. creation of meadowland / woodland, etc. – may perhaps have to be focussed on locality and existing provision.

In ensuring energy efficiency is sustained terms: Could the provision by developers of ‘maintenance covenants for buyers / tenants’ (stating when and what needs to be done and who is responsible for doing it and funding it) be a way of ensuring that homes do not deteriorate in terms of sustainability. In terms of servicing of heating etc. the provision of the first year in a new house with servicing included and the option to renew being default, might have benefits both in terms of keeping systems at optimal performance and in terms of business engendered by the servicing contracts. Those opting out would have to ensure a minimal (stated) level of servicing and establish that their provider was appropriately qualified to do the work.

In addition to this:

- Ensuring appropriate spatial frameworks through the planning process through Strategic Development Plans and Local Development Plans.
- Encouraging early dialogue/consultation with local communities.
- Promoting public- private partnerships.
- Enabling the availability of funding - private and public finance to assist with the delivery of infrastructure costs and housing; both open market and affordable housing.
- Investment in affordable public transport which meets the needs of residents.

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?

Continuation of New Build grants to Local Authorities but with:

- a) more flexibility in the timing of the delivery of the new works – allowing more thought to go into sustainability and the development planning stage.
- b) additional funding available for ‘joined-up thinking schemes where a development for other facilities (local government or other government funded bodies) is tied to a housing need to ensure better land-use for both

schemes.

c) additional funding for cross-authority co-operation in addressing housing needs.

d) funding to assist with re-development where sites of older stock which was not designed to become long-term housing solutions can be re-developed and the larger plot sizes utilised to gain additional units (may also need some minor relaxation on greenspace requirements to make these sites viable).

e) some way of making more energy-efficient homes benefit the social landlord as much as the tenant – perhaps by allowing efficiency above a set amount to trigger larger rental returns.

Current constrained financial climate means that companies, local authorities etc are cutting back on training which is impacting upon the ability to develop a multi-skilled workforce.

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

- Tax breaks for those developing/using innovative methods of construction.
- Robust evidence of benefits of new technologies/construction methods both in terms of operation and of occupation.
- Productive dialogue with finance sector so that availability of finance is less constrained and more readily available, particularly for new methods which can be seen as more of a risk and can initially be more expensive.
- Greater joint working across public and private sector to share good practice and achieve economies of scale.
- Easier dissemination of information – perhaps a central virtual mall which featured innovation and themes thereon.
- Financial incentives to Local Authorities if they utilise ‘leading edge’ methods / products?

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?

- Recognition of local issues and challenges – housing markets conditions vary widely across local authority areas/Scotland, one approach does not fit all.
- Improved planning/timing so that resource allocations are notified and programmed in advance so that both local authorities and RSLs can plan and develop more effectively.
- Real incentives and support to recompense for additional costs in bringing forward greener construction methods and technologies.
- Certainty of funding for a longer period of time to allow commitment to larger scale projects/ more than current grant funding a unit to

provide affordable rented housing / assistance with procuring affordable private finance.

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

- Clear evidence of the benefits of greener new homes so that a higher 'value' is placed on this type of house and are therefore in demand.
- Tax incentives
- Sharing information to support the industry.
- People need to understand better what it will mean in energy terms. EPCs whilst useful do not say that this sustainable house is 'x'% cheaper to run than this one. More effort needs to be made at a national level to gain and publish this data for everyone's use.

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?

It is very difficult to make construction firms offer additional training when these businesses are struggling to survive in a recession. Any training will therefore have to be supported by Government, UK or Scottish, subsidy. The construction sector has a strong sector training organisation in the CITB which is an industry training body and a Sector Skills Council.

A top-down incentive for local government to become leaders and exponents of training in and about new construction methods, procurement, whole life cost, and sustainability would be useful.

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?

It would be best to work through CITB as it gives out training grants to the industry funded through a Government approved levy system. In addition most Scottish local community planning partnership has an employability arm that will source funds for training especially for those furthest from the job market.

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

During the building boom when there was a shortage of applicants for work in construction more females were considered for apprenticeships. To reduce the gender imbalance, and attract more skilled individuals, the industry has to sell itself as having sustainable jobs where training will be guaranteed. Offering work experience to school pupils can be a good way to let potential recruits know about the opportunities in the construction sector.

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?

There are still a high percentage of jobs in construction that are filled through "word of mouth". There should be a greater effort to recruit through Job Centre Plus and advertising.

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.

Individuals, especially young people, suffer from the lack of public transport in rural areas. This makes attending training and employment difficult. Local schemes exist in Aberdeenshire, funded by the Fairer Scotland Fund, to help young people with transport costs. This Fund is available across Scotland but LAs will have to be persuaded to spend it on transport programmes.

Running training schemes for a small number of people may not be viable and this counts against those in rural areas. Using e-training is only an answer if broadband is available.