

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

Particularly with the emphasis on tackling fuel poverty.

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

Cost has been the main barrier for landlords, followed by uncertainty over the long-term performance of new energy efficiency measures. The limited number of cost-effective options in rural areas is a further barrier.

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

The availability of Government funding for high cost measures (biomass community heating, heat pumps, external wall insulation and extension of the mains gas network) have certainly helped.

Improved specification, planning, monitoring and end-user awareness raising have all helped encourage both landlords and occupiers to accept new energy efficiency measures.

Ensuring that installers are properly trained in the installation of the relevant technology is also a key factor.

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

A national campaign of awareness-raising would be helpful, particularly in relation to the benefits of a "fabric first" approach to maintenance/improvement expenditure.

Landlords are unlikely to undertake high-cost energy efficiency improvements unless they can demonstrate a return on their investment. Likewise, homeowners and tenants will be generally reluctant to accept the measures unless they are convinced that it will result in cost saving for them. Behavioural change is only likely to take place if occupiers fully appreciate the relative benefits of installing such measures. Once awareness has been raised then incentives should be used to encourage those householders who might otherwise decline the offer.

Where householders occupy hard to treat properties, then financial incentives may be the only way to encourage take up of the appropriate energy efficiency measures. This should be supported by accurate and impartial advice on the most effective energy efficiency solutions for the

particular property.

The building regulations could be further modified to make it mandatory for alteration works to result in increased thermal efficiency of the relevant dwellings.

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

Many houses in remote or island areas are currently both hard to heat and hard to treat. Higher capital costs, security of supply and annual running/maintenance all barriers to improving energy efficiency.

Rural and remote areas generally suffer from the lack of gas main services and efficient electrical heating systems.

5. (b) How should these be addressed?

The development of sustainable community heating systems would help address these issues.

Landlords may be encouraged to develop community heating systems if supported by competent technical advice and financial assistance. Appropriate training of local contractors could both help stimulate the local economy and minimise delay in addressing maintenance issues when they occur.

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 and other agencies could help bring about a step change by both facilitating initiatives and leading by example.

Scope exists to better integrate the work of Planning/Building Control departments with agencies providing environmental/energy efficiency advice.

In their capacity as landlords, Local Authorities and other Registered Social Landlords (RSLs) could work together to maximise the benefit of community initiatives, particularly in partnership with energy providers and community groups. RSL's could lead by example in bringing about a step change in retrofitting Scotland's housing. Knowledge and experience already gained in progressing the SHQS initiatives make RSLs well-placed to help local residents take advantage of available funding sources.

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

The Scottish Government should ensure that the National Retrofit Programme is well-planned, fit for purpose and is readily understood by landlords, home owners and occupiers.

The Scottish Government should also work with energy providers to help ensure that available funding is targeted at communities in greatest need of energy efficiency improvement.

The Government should also ensure that landlords and homeowners are provided with consistent, high quality energy efficiency advice via initiatives such as the Green Deal and ECO.

The Government could also help facilitate improved communication, sharing of expertise and ready access to relevant case studies. It could also work in partnership with social housing providers to develop relevant case studies, particularly in relation to hard to treat properties.

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

By devolution of additional powers, the Government could help ensure that priority issues are addressed at a local level, thus improving the chances of effective sustainable solutions.

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

A combination of sanctions and incentives will be required across the housing sector to achieve the scale of change 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)?

By ensuring that a consistent approach is applied across the housing 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 No

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

Either through the Scottish Housing Regulator or Local Authorities.

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.

Further explain the benefits of a fabric first approach to energy efficiency would be beneficial.

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

Caution should be used not to discriminate against owners who have inherited properties with poor energy efficiency but not have the resources to meet subsequent energy efficiency standards.

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

As an action of last resort.

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 outwith 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?

As a minimum the Government should issue guidance to homeowners on the subject of dealing with Factors and switching Factors.

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

By awareness-raising campaigns and a combination of sanctions and incentives.

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?

By highlighting on the front page the estimated current and potential annual energy costs.

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

Adopt a consistent approach to minimum standards.

Adopt a balanced approach – considering other relevant social, economic and environmental factors.

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

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

A consistent approach should be adopted across the housing sector.

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

Phases – so that all parts of the housing sector have the same standards by 2020.

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?

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

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

Suggest taking lessons from other industries eg the car industry which has reacted to Government taxation policies by introducing new class-leading vehicles.

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 a minimum there requires to be increased dialogue with the RICS to achieve improved mutual understanding of the issues. Surveying practice and training of individual surveyors could be modified to improve the level of information in surveys or Home Reports on verifiable energy efficiency measures. Ultimately, Surveyors operate on comparators and this approach is unlikely to generate higher values due to the presence of green measures unless a recognisable impact is made upon eg council tax bandings or actual increased mortgagability of greener homes.

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?

Part of the problem to date includes the reputational damage caused to the greener homes movement by under-performing technology or technology which has been over-hyped and under-delivers. Consumers need to have faith that the investment they are making will deliver and the Govt could do more in this area. There has been and will continue to be mis-selling in this big growth area.

There needs to be more recognition and support by Govt for the special challenges of rural and remote areas especially in off-gas areas or former stock transfer estates which could be described as hard to treat.

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?

The provision of suitable tariffs for the use of electric air source heat pumps in off-gas areas is essential.
Provision of greener standards inevitably leads to increased capital cost which is unappealing in the current sluggish housing market. Influencing the market in this scenario may take wider economic or fiscal measures

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

Housing Associations have been leaders in innovation in design and green technology and creating successful and balanced communities. Now is not the time to be de-investing in this sector leading to the shedding of vital capacity. Increased promotion of exemplar projects of this type would be useful.

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?

As stated in 38 above, the transformation desired must take account of the need to support the development of new build. With the current decline in housing association and private sector completions, this is not the atmosphere in which to achieve a significant cultural change in the market

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

Demand levels for affordable housing and low-cost home ownership continue to rise (more than 8,000 applicants, exclusive of transfer applicants in the Highlands for instance) but changes to subsidy rates and absolute investment levels have provided an existential threat to RSL Development capacity. The biggest single action the government could take is to increase support and funding to affordable housing to lead this market transformation.

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?

See comments in 39 and 40 above. Looking to the medium term, one effective additional mechanism could be the introduction of flexibility in subsidy arrangements for projects which were purchased but not yet developed under the previous funding regime. The discounting of previous grant would help to generate subsidy levels capable of developing a number of exemplar projects to champion greener construction methods and technologies.

The current stop/start drip-feed of investment into the sector is not conducive to planning effective, medium term procurement projects involving off-site manufacturing. The industry needs medium-term certainty of investment levels over at least 3 years to generate the efficiencies and relationships which will deliver greener construction methods and technologies.

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

The construction industry is conservative in its approach because it doesn't want to add costs which a competitor is not necessarily facing which will potentially impact upon sales. Specific challenges to the private sector include the funding of costly additional infrastructure such as district heating networks for which more loan funding could be made available

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?

Clearly, training and efforts by new technologies companies to expand to meet demands will be compromised by an erratic and overly complex subsidy environment

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

Further to comments above, there has never been a better time to ramp-up investment in housing and affordable housing in particular. Certainty about investment levels and future workloads is central to companies' ability to invest in skills and training

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?

Unfortunately the construction industry is so damaged by lack of investment, business failures and difficulties in securing borrowing that it's not well placed, currently, to receive messages about the funding and support for skills and training. The Government needs to improve its dialogue with industry bodies and consider loosening the burden of procurement rules. The use of well thought out community benefit clauses can help to support skills and development of training opportunities.

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

These opportunities should be open to all but the govt should find additional methods of supporting local authorities and their partners in their efforts to provide wider social benefits through helping unemployed and vulnerable people

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?

Women are under-represented in this industry and children and young people don't seem to be attracted to the industry in the numbers that ought to be the case. The government and industry should redouble their efforts in this area with effective promotion of the industry, support for flexible working and efforts to rid construction of its confrontational, male-dominated reputation

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.

Rural and remote areas suffer the same difficulties in this area as other parts of the country, only more so due to lack of scale, higher costs etc. In addition rural areas are more susceptible to the reduction in investment and

traditionally lower take-up rates of government initiatives. The rural context must be considered in addressing this issue:

Rural economies have a higher proportion of small and micro-businesses, self-employment and home-based work as well as lower average wages. There is poor availability of and limited access to training opportunities in work based learning, Further and Higher Education.

Key barriers to training and skills development for rural areas include:

- poor public transport, making travel to work difficult for low-paid employees and creating access problems for those seeking training;
- poor access to broadband;
- higher costs of training provision, due to poor economies of scale, where populations are sparse;
- lack of progression opportunities and limited choices within local areas;

Current procurement rules allow contracts to be awarded where little community benefit or local economic spin-off is evident. This should be changed in return for increased investment levels which would allow local firms to compete fairly and plan ahead for real increases in skills and training opportunities based on predictable workloads over the medium term.