

4. Please indicate which category best describes your organisation

(Tick one only)

Executive Agencies and NDPBs	
Local authority	√
Other statutory organisation	
Registered Social Landlord	
Representative body for private sector organisations	
Representative body for third sector/equality organisations	
Representative body for community organisations	
Representative body for professionals	
Private sector organisation	
Third sector/equality organisation	
Community group	
Academic	
Individual	
Other – please state...	

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 and disruption to house or flats, and reduction in room sizes

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

UHS is a good scheme but doesn't work for internal insulation costs and the reduction in room size is a problem.

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

Grants or discounts on taxes like council tax / VAT. Listed buildings and Conservation areas need special support as internal insulation and secondary glazing is sometimes the only option, at high cost.

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

Window replacement costs , underfloor insulation, and draughtproofing are all major cost issues as well as internal/external insulation. Limited contractor base also can act as a barrier to competition. Detached properties as often found in the country are always more expensive to deal with. Mainly electric or oil fired heating systems are also costly to run.

5. (b) How should these be addressed?

Possibly controlled prices for insulation measures or subsidies from the Scottish Govt depending on the remoteness of the property.

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?

Facilitating measures but not delivering directly. Simple measures could be delivered locally and help sustain local businesses and more complex measures would use an accreditation system for contractors, but not at a high cost of registration..

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

Support and promotion by the Scottish Govt rather than Local Authorities

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

Improved financial support and provide a Scottish solution

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

More funding at low or no cost to householders and landlords

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)?

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?

A single standard would be a simple solution but NOT mandatory as personal choice should still prevail.

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.

Should read "review your heating system and controls etc...." as not all houses have boilers

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

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

Impossible task to place on local authorities without substantial additional new resources

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

Could lay an impossible financial burden on the Authority

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

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

But only in exceptional cases

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

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

Wait till the new Act beds in

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

Using the NHS as a way to deliver a message that health benefits can come from proper heating and ventilation?

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

No

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

Colour coding, as current system, is the clearest and simplest way to communicate energy efficiency to householders

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

Personal choice should remain a key principle of Government

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

No new regulation is required

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?

Standards should only apply to new-build housing

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

No new regulation is required

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

No new regulation is required

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?

No new regulation is required

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

Yes No

No new regulation is required

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

No new regulation is required

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

No new regulation is required

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

No new regulation is required

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?

No new regulation is required

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?

Cheaper mortgages

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?

None – should be covered by the Home report

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?

None at present

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?

Wait and see how the above proposals work in practice

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

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?

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

Reduction in overall procurement controls and encouragement of local skills and ideas

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?

Increase grant available from Government for this type of construction

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

Provide a clear and concise method of assessing "green-ness" and clear up doubts over how transport costs from source for materials, or processing / shipping/ energy consumption, should be assessed

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?

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

More investment in Construction projects and the industry in general so higher profit margins are possible to help fund this.

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?

The construction industry has to engage more fully with Skills Development (Scotland)

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

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?

No

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.

Very small one-person businesses cannot afford to take on non-productive staff in the current difficult climate.