

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 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 checked="" 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

The vision and objectives set out in sections 19 and 20 provide clear direction to Scotland's Sustainable Housing Strategy, defining the SMART targets and important themes from the Greener Homes Summit.

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

The main barriers that prevent home owners and landlords installing energy efficiency measures are disruption, a general mistrust of "doorstep salesmen", unclear benefits and sometimes additional costs imposed by contractors (eg scaffolding) that negate the "free" option. The "unclear benefits" issue is an issue which recurs regarding information distribution. Property values are deemed to increase if the homeowner invests in a new kitchen or bathroom but currently this is not as transparent for installing energy efficiency measures.

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

Practical solutions and incentives to overcome such barriers include basic issues such as the use of understandable terminology. Homeowners generally understand the term "energy efficiency" must involve savings and therefore financial benefits. This is not the same for "carbon saving" which often does not have the same positive impact. If clear economic benefits can be proved, both for the current homeowner and by improving the value and saleability of the property in the future, people will be more likely to install energy efficiency measures. To overcome the general mistrust that homeowners have, input from local council covering particular areas at a time would give credence to the work as would the fact that neighbours were also getting the work done. Finally upgrading Building Regulations to impose a certain degree of energy efficiency grading to properties would be a possible solution.

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

*As 3
Consistent information is a key issue. Often homeowners do not understand what is required and what is being offered. A formal sustainability consultants' report on the dwelling could resolve this.*

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

A large proportion of properties are “off the gas grid” so increased investment from the major utility companies is required. In addition an improved supply chain set up by the larger utility suppliers using local firms would benefit the support provided in rural areas. Older properties in rural areas are often of solid wall construction which does not respond to the same simple “energy efficiency” solutions as cavity construction. This makes the property more difficult to treat and often creates a greater degree of disruption.

5. (b) How should these be addressed?

These issues could be addressed in part by a greater investment in utility infrastructure in conjunction with an easier process for SMEs to apply for and gain the stamp of approval from Local Authorities. Regarding the building structure, further design assessment and pilot tests are required on alternative solutions.

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?

The Local Authorities and other agencies could play a critical role in bringing about a step change to retrofitting Scotland’s housing. Initially the release of simple, understandable information to homeowners on ECO and Green Deal options would be beneficial and would resolve some of the mistrust referred to earlier. Particularly in rural areas one option would be to use part of the funding pot to form JVs with utilities companies to improve the supply network infrastructure. Local Authorities could bid into Scottish Government funding programmes; the formula-based option would give LAs incentive to spend in accordance with Fuel Poverty Forum principles. Dependent on the area the Green Deal delivery mechanisms could be adopted through a framework, consortium or partnership with other LAs, RSLs and Housing Associations.

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

The Scottish Government has a fundamental role to play in a National Retrofit Programme. This would include making funding available through a formula-based option for Local Authorities to buy into the National Retrofit Programme. Once in, it would be essential for the Scottish Government to regulate the actions of the Local Authorities to ensure consistency across regions and facilitate the Local Authorities to work together with each other, RSLs and Housing Associations.

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

The devolution of financial incentives to the Scottish Government would increase their powers to facilitate and regulate Local Authorities and enhance actions within the National Retrofit Programme.

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

The primary issue in achieving the scale of change required to existing homes is trust from the homeowners. In order to achieve this involves improved information release and greater ownership by the Scottish Government and Local Authorities on the overall scheme. One option could be a defined programme of works over a geographical area, giving homeowners comfort that all houses are being offered the same improvements. This could also involve an "opt-out" option for homeowners on the understanding that the house will be assessed and solutions defined for the future.

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)?

The National Retrofit Programme will maximise benefits for all consumers provided the information release is improved, making options clear and understandable to all. A "FAQ Website" and helpline could be created to assist consumers.

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 mandatory condition standard could be achieved through undertaking managed property surveys highlighting areas of energy inefficiency and structural improvement. Houses could then be categorised to improve future saleability.

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.

No comment.

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

In principle Local Authorities should be able to require owners to improve their properties but as a follow on from Q11, properties could be surveyed and graded for structural and energy efficiency. A low grading could trigger a work notice but the trigger level of grading would need to be clearly defined.

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

In principle local authorities should have the power to enforce decisions taken by owners under the title deeds, tenement management scheme or by unanimity provided the need for repair work is clearly defined as in Q13.

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 in Q13 and Q14 provided there are clearly defined requirements and formal survey and grading of the properties has taken place.

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

The process for using maintenance orders should be streamlined by prioritising the survey of a property through its type: public, landlord, private. Thereafter the survey should be undertaken and the property graded for structural adequacy and energy efficiency. The survey could be prioritised based on the lowest grade.

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

As Q16

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

The ability for local authorities to issue repayment charges for work done on commercial properties would encourage commercial operators to invest in energy efficiency.

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

Option 2 – issue guidance based upon the Property Factors (Scotland) Act 2011.

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

The importance placed by owners and tenants on the energy efficiency of their properties could be raised through the process of grading the property to improve its value and saleability.

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

Minimum energy efficiency standards should be defined in order to maintain consistency in the retrofit opportunities being offered to homeowners and assist in creating an acceptable competitive market for the design and installation of this work.

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

We would recommend that closer scrutiny is required of the training of those carrying out the surveys to ensure that the reports are professional and accountable and that the information contained in the EPCs can be relied upon.

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

Information relating to the introduction of regulations which impact upon private property owners should be well presented to avoid scare-mongering tactics and encourage buy-in from the public.

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

In addition to the current criteria of property value and geographical area, Council Tax grading could be linked to the energy efficiency grading of the property.

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?

We consider the views to be relevant. We would suggest looking at taking this further to consider air tightness testing as a means of determining energy efficiency.

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

Different energy efficiency measures will be applicable to differing ages of properties and properties in differing locations. For example it may be more relevant to focus on draft proofing of older buildings such as tenements and thermal insulation may be more relevant in more recent building stock.

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

In principle houses of the same type in the social and private sectors should be expected to meet the same standard, especially if the private sector housing is being rented out or is part of a mixed tenure. There should be some latitude for private home-owners depending on the type of property and extent of funding available for retrofit work.

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?

We should perhaps consider regulation to make it easier for all groups to see and understand the amount of energy being consumed and also make it easier for them to control that use of energy.

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

Yes No

It is important that regulation does not negatively impact upon the rate of movement of properties so additional trigger points should be considered. Major structural repair or extension could be used as such triggers. A specific time period since last assessment might also be considered as a suitable trigger.

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

Rollout of regulations should be phased based upon the age of the property and the period of time since the undertaking of any energy efficiency work.

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

The proposed issues of cost, capacity, processes and suitability of existing structures would appear to cover the key elements.

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

In principle the sanction should be able to be passed on to the buyers otherwise the principle of purchasing old properties to improve and develop them would become non-existent.

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?

In order to give sufficient time to prepare regulations and to tie in with the launch of PRS in England and Wales, 2018 would appear to be a reasonable year to commence regulations in Scotland.

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?

Terminology is paramount. While it is clear that sustainability and low carbon are prime descriptions of high quality homes, due to the current economic climate the consumer regards "Energy Efficiency" as more important if it can reduce the house outlays.

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?

The Valuation Survey of the property in the future will need to include some reference to modern energy efficiency applications which have been installed in the house in order to create savings on energy bills. This will need to involve suitably technically skilled consultants who can assess the benefits provided by the new technology. The coordination of this with the current surveys undertaken will be a critical issue to create an easy-to-read document, avoiding the seller having to organise multiple reports and the purchaser having to review them.

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?

As defined in section 3.15 the primary challenges which need to be addressed relate to information and communication.

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?

It is clear that schools and further education establishments are educating our children and young people in the matter of sustainability. Unfortunately they won't be purchasing houses for some time. It is the education of the current house owner which needs more work. Unless they are already interested in environmental issues they are unlikely to sign up to the Green

Homes Network or visit the BRE Innovation Park. Regular consistent advertising campaigns with local case studies showing clear economic benefits may be one way to influence the consumer. Another will be through financial measures such as “green mortgages” and reduced Council Tax based on energy efficient results.

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

Scotland new-build developments in general are designed to a much higher level of sustainability, adopting efficient SuDS schemes and well defined layouts encouraging pedestrian traffic, particularly when “Designing Streets” is adopted. However, often it is the Local Authorities Roads Departments who cause problems with the Design Team adopting layouts in accordance with “Designing Streets”. Issues are raised regarding the maintenance of adopted roads and access of refuse collectors particularly in poor weather. Further consideration by the Local Authorities to resolve these issues is required. Generally it should be highly recommended that a sustainability/energy consultant is involved from the very earliest in the design process. This would ensure that all of the key elements of sustainability were worked into the scheme and given the highest priority.

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 described in Q38 a greater degree of “buy-in” from Local Authority maintenance providers is often required to accommodate changes from “the norm”.

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

Where residential development is being undertaken for RSLs, Housing Associations or Local Authorities greater consideration could be given to innovative, “green” construction issues rather than to cost. If the Preferred Bidder is appointed based on such proposals, rather than necessarily being the cheapest, this will encourage innovative methods of construction being brought to the market in the future.

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 incentives for contractors/house-builders to meet high standard of green construction methods. Greater consideration should be given to innovative, “green” construction proposals rather than to cost. If the Preferred Bidder is appointed based on such proposals, rather than necessarily being the cheapest, this will encourage innovative methods of construction being brought to the market in the future.

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

The construction industry will make greater use of innovative methods to deliver greener homes if more research and information is made available on such techniques and they become less of a “dark art” performed by the specialist few. Information on the whole life-cycle-costing benefits of these methods should be more available to all, including the consumer.

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?

No comment.

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

While it is understandable that companies need to invest in their future, due to the current economic situation it is particularly difficult for SMEs to allocate funding to training and apprenticeships. Due to the type of work involved in retrofit it is more likely that such work will be undertaken by such SMEs and therefore more consideration needs to be made to provide support to encourage 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?

Information release appears to be the crux of the issue in a lot of cases. The large construction companies with R&D teams and positions on Cross Party Groups and committees gain knowledge of funding opportunities while the SMEs do not. There is a clear responsibility for the government to make this information more easily accessible. In addition there is a fundamental role for institutions and associations within the construction industry (such as ACE, ICE, IStructE, CECA, RICS, RIAS, CIB, SBF etc) to link with the government and share such funding information with their members.

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

By making information on such opportunities easy to access within the public domain.

47. Apart from training and skills opportunities are there any other issues that should be addressed to make employment in construction and other industries become more representative?

Over the past 10 years the construction industry has made significant progress in embracing and promoting equality and diversity across all levels of its workforce. This has made employment in the industry more representative than it was in the past. However, many trainees require support or encouragement to secure that first step in employment or technical education. The institutions, associations, education establishments and public support services have a major role to play in this area.

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.

We would suggest that the University of the Highlands and Islands might be the right body to ensure that the necessary skills are available.