

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"/>

CONSUTATION 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 would be strengthened through acknowledgement that fire in dwellings has a significant social, economic and environmental impact and therefore to be sustainable, housing of the future require to be made fire safe by design. Evidence within the Scotland Together Report and Annual Fire Statistics indicate that the cost and impact of fires in housing in Scotland is far greater than elsewhere in the UK. There are over 6,000 reported fires in dwellings each year in Scotland at an average cost of circa £26,000 per fire, giving rise to an estimated 25,000 Tonnes of Carbon Dioxide emissions.

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

No comment

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

No comment

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

To control the release of harmful/damaging products of combustion a holistic and effective energy efficiency programme could include financial incentives such as reduced household insurance or specific grants for providing measures to prevent fire spread, give early warning to occupants and in the case of sprinkler systems control fire in its incipient stage (thus reducing carbon output and water usage).

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

For life safety, property protection and environmental protection consideration should be given to the benefits of low cost automatic fire suppression systems within homes for high risk householders such as older persons or persons with disability in remote/rural and island communities.

5. (b) How should these be addressed?

By inclusion within future housing standards and building regulatory technical standards. Current requirements for the provision of water based

fire suppression systems in some types of housing should be extended to all housing for older persons or persons with disability.

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?

Retrofit should extend to the upgrading of fire safety provisions such as fire detection and warning systems. The number of new homes built in Scotland each year is approximately the same number as those damaged by fire each year (circa 6,000) and the majority of fires in dwellings involve social housing. The cost of inadequate fire and safety provisions are therefore disproportionately borne by low income families (many of whom are uninsured) and local authority housing and social services. Due to the relatively high number of fires in the home in Scotland investment in fire and safety improvements within refurbished social housing is likely to be cost effective in the medium to long term and would protect the substantial investment being made in making homes more energy efficient.

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

Setting minimum acceptable standards of design, construction and fire performance and fire resistance materials used. Promoting the provision of enhanced/improved fire and safety measures such as automatic fire warning and detection and water based fire suppression systems within homes of high fire risk tenants. Taking steps to ensure that any financial investment in the retrofit programme is being protected. Each year many upgraded homes are subsequently damaged or destroyed by fire, the economic, social and environmental impact of fire can be greatly reduced by improving fire safety measures.

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

No comment

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

No comment

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)?

Due to the ongoing increase in the ageing population a greater percentage of the housing stock requires to be made suitable (safe and secure) for

older and single persons and persons suffering from disabilities and or age related long term limiting illnesses such as dementia. As these are the type of tenants most at risk from fire, improved fire and safety measures should form part of any refurbishment programme for housing specifically designed for older or vulnerable persons.

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?

By better utilising existing enforcement agencies and services such as local authority Building Control and in the specific case of fire safety by the Fire & Rescue Service.

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.

To reduce the social, economic and environmental cost of fire in the home and most importantly minimise harmful carbon emissions resulting from fire, we would advocate that it would be prudent to make sure fire and safety standards are in accordance with the requirements of current building regulations.

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

Improvements should be addressed through the building regulatory framework which should be amended as necessary.

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

Only to the extent of ensuring the ongoing health, safety and welfare of tenants/residents and or protection of the environment.

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

No comment

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

No comment

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

No comment

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

Only where necessary to ensure the health, safety and welfare of persons or the community and or to protect the environment from harm.

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

No comment

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

No comment

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

Yes but in combination with improved standards of fire and safety within housing.

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

No comment

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

Any regulations should be based upon the need to safeguard the environment and ensure the health, safety and welfare of residents/tenants.

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

No comment

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?

No 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

Yes, harmonisation of standards across the private and social housing sector is essential.

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

Absolutely dual housing standards and by implications dual safety standards must be avoided.

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?

As these are the type of tenants most at risk from fire, improved fire and safety measures should form part of any refurbishment programme for housing specifically designed for vulnerable persons. As previously highlighted fire, as a producer of significant quantities of environmentally damaging/harmful combustion products, must be factored into the environmental improvement and sustainability equation.

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

Yes No

No comment

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, any regulations should be applied across the board.

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

In seeking effective measures to protect the environment account must also be taken of the environmental, social and economic impact of the 25,000 deliberate fire fires each year in Scotland in and around housing and a much more robust approach taken to deter persons from deliberate fire setting within communities/neighbourhoods. This should be incorporated into or reflected within existing guidance on neighbourhood management strategies.

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 comment

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 comment

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?

In the case of fire and safety measures to minimise fire and resultant carbon emissions reductions in high fire risk household or housing providers, reductions in insurance premiums could act as an incentive.

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?

No comments

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?

The overall intrinsic safety and security of homes needs to be recognised and factored in if homes of the future are to be sustainable and energy efficient. In addition there requires to be a greater awareness of the damage to the environment from fire in the home resulting from the emission of combustion products.

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?

As previously highlighted the effects of fire and in particular the release of harmful climate changing combustion gases needs to be highlighted as part of an effective package of sustainability measures.

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

As previously discussed more needs to be done to protect individuals, homes neighbourhoods and the environment from the impact of both accidental and deliberate fires.

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?

No comment

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

Following several major fires in buildings under construction there have been a number of concerns raised by the Fire & Rescue Service about new building materials and new methods of construction. To protect people and fire fighters, methods of construction must take into account, the fire performance of new building materials and methods, resistance to fire and fire spread, together with site safety and security throughout the construction phases. Training for construction workers must also include fire and fire safety/prevention.

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?

The provision of low cost water based automatic fire detection and suppression systems should be considered within all housing specifically designed and built for older or vulnerable persons.

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

Scottish water must make it less complicated for home builders to obtain necessary consents, approvals and permissions to connect and commission domestic water based sprinkler/fire suppression systems.

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?

Improved fire and safety training within the housing and construction sector is required to prevent fires during the construction phase and also ensure the correct provision of and fitting of passive and active fire protection measures such as fire stopping, fire resistant walls, floors, doorsets and fire

warning/suppression systems.

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

No comment

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?

No comment

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

No comment

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 comment

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.

No comment