

4. Please indicate which category best describes your organisation

(Tick one only)

Executive Agencies and NDPBs	<input type="checkbox"/>
Local authority	<input checked="" 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 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

We support the vision and objectives, but would expect the strategy to address climate change adaptation as well as mitigation.

We generally agree with the outcomes set out in each chapter, subject to the following comments:

A National Retrofit Programme: the language of "strong economic growth" here deviates from the language in the Scottish Government's purpose of "sustainable economic growth". A focus on economic growth without the qualifier "sustainable" could cause conflicts with social and environmental objectives.

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

Comments

- Lack of knowledge
- Finance
- Complexity of various funding streams and ability to get assistance to complete forms and applications
- Disbelief in benefits
- Inconvenience of installing measures
- Cold calling from companies making homeowners sceptical about offers
- Fear of investing in renewable technologies which some still consider to be untested and yet to be proven
- Builders still not convinced that these are priorities (over and above those that they must comply with due to regulation and legislation)
- VAT rate
- Inability in some instances to tap into an energy source i.e off gas grid
- Private landlords failing to see benefits as they already have a guaranteed income.

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

Comments

- Local Energy Efficiency Advisors/local surgeries/face to face
- Local and National Awareness campaigns
- Private landlord regulation e.g accreditation/compliance backed with

financial aid/advice

- ECO/GD and other Government assistance to owners
- Private Sector Housing Grant Assistance
- Partnership awareness campaigns with Social Work, NHS and Educational establishments
- Requiring energy efficiency standards to be met before a house can be sold

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

Comments

Within Clackmannanshire it has been established that face to face contact is the most successful way to promote energy efficiency and to encourage the installation of energy efficiency measures.

Proactive fuel poverty mapping and heat mapping has assisted in identifying clients and the potential to assist people to become more energy efficient.

The development of a one stop LOCAL advice shop would provide focus for all tenures. Local Authority Green Deal assessors are considered to be a way forward as we can provide impartial advice and direct individuals to trusted partner installers. A local one stop shop with trained energy assessors would certainly help to raise the profile of energy efficiency and provide much needed assistance to all tenures and the building trade.

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

Comments

- Solid Walls
- Hard to Treat properties
- Partnership working with Historic Scotland to develop solutions that don't impact on the properties aesthetically
- Raising awareness
- Higher costs in tackling SW and HTT
- Higher costs to provide solutions to remote areas

5. (b) How should these be addressed?

Comments

The key is obviously access to funding and resources. The consultation document identifies a substantial amount of funding which will assist in addressing the above. Key to this will be awareness and education which should incorporate localised face to face support as opposed to just call centres.

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?

Comments

Clackmannanshire has yet to identify the best model of Green Deal to adopt for the community. Presentations from the Scottish Government are scheduled to assist in this process and we are currently noting proposals from energy companies for later consideration. It is considered that we have a pivotal role in the process of promoting and delivering the retrofit programme.

It is strongly believed that we are in the best position to deliver packages that have extensive community benefits that will create local employment and generate increased local income.

It is firmly believed that the local authority is best placed to provide the one stop shop facility that will promote and advise on initiatives.

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

Comments

- Ensuring Scotland obtains a fair share of the national ECO fund.
- Promotion of the programme to all tenures
- Assisting local authorities to establish local energy efficiency one stop shops managed by the L.A.s

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

Comments

From a financial point and as an incentive towards increasing energy efficiency overall – a reduced retrofit VAT

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

Comments

Statutory duties on private landlords (complemented with appropriate financial assistance)

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)?

Comments:

Clackmannanshire's Energy Efficiency and Fuel Debt service offers a template for ensuring the most vulnerable in our community are reached.

Links with Education, Social Work, Voluntary organisations, Community Forums, Private Landlord Forums and an established focus group all would assist in meeting this goal

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

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

Comments:

Enforcement would be a major task across the wide sphere of the owner occupied market and safety nets would have to be incorporated to assist those who could not afford loans due to other financial commitments.

GD and ECO may assist in the process but substantial resources may be required to enforce and monitor.

A phased introduction may be an option, whereby every new let and every house up for sale has to meet insulation standards laid out under current building standards.

12. (a) In box 6 we identify a checklist for maintaining a quality home. Do you agree with our proposed hierarchy of needs?

Yes

12. (b) If you think anything is missing or in the wrong place please explain your views.

Comments

Why not use the phrase "Fit appropriate insulation" to keep it simple

As not all homes have a boiler and it is not always possible to be connected to the most effective fuel supply. Should it not be "ensure that your existing heating system is as energy efficient as possible and review the availability of grants and funding to help you improve the energy efficiency of your system (and if appropriate)..... by contacting your local one stop energy efficiency advice shop

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

Comments

This would require to be supported by funding assistance and advice. In effect a notice could be served which signposted assistance available to enable compliance.

This would certainly help in mixed tenure blocks.

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

Comments

The main problem is recovery and the resources to do so but the situation could be backed with ECO and GD packages to minimise costs

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

Comments.

The major problem here would be policing the notices with current resources

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

Comments

If the local authority was to provide more specific guidance or in fact set out a maintenance plan for the owner, this would help to streamline the process by preventing delays created by inexperienced persons attempting to draw up their own plan.

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

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

Comments

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

Comments

The major problem for Clackmannanshire is in fact the lack of factoring arrangements

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

Comments

Every new tenancy (all tenures) should have details of the likely energy cost for the property based on different scenarios/family profiles.

An explanation, with worked examples and monetary values, of the effect on energy bills of energy efficiency measures meeting the different EPC ratings - this would make it easier for owners and tenants to understand the benefit of more energy efficient housing.

Our local authority are currently considering the phasing in of annual energy efficiency checks on our homes, which would provide the opportunity for our tenants to become more aware of energy efficiency and assist them to become more energy efficient. The idea is to target new lets initially, along with those identified as vulnerable. Fuel debt advice and associated services will also be provided

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

Comments:

In theory this would be very proactive but the difficulty would be in policing

the standards.

The introduction of minimum standards in the private sector would assist in the private rented housing sector where the incentives for owners to improve energy efficiency are weaker than for the owner occupied sector.

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

Comments

By identifying what the rating would equate to in annual running costs associated with different family lifestyles and profiles.

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

Comments

The principles of the “Energy Pyramid” reflected in Box 6 of the consultation document i.e energy efficient should have a greater priority than renewables.

Individuals incomes and their other established contractual commitments/debts

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

Comments

Improved Council tax discounts could be provided for more energy efficient properties.

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

The standard should mirror the proposals specified within the EESH consultation doc. i.e. option 3

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

All houses should meet the same standard.

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

Agree that standards for social and private housing should be the same.

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

In these instances raising the energy efficiency in these homes would help to reduce the individuals bills and at the same time reduce carbon emissions. It is a known fact that those who are disabled or who have long term illnesses are more likely to be in fuel poverty due to their need for increased heat for longer periods.

Older people and people with disabilities are likely to need additional help in preparing their properties for energy efficiency improvements.

Some groups of people, including people for whom English is not their first language, might be particularly vulnerable to mis-selling or cold-calling - a single trusted source of information (e.g. the local authority) might help to allay any suspicions about the legitimacy of energy efficiency improvements that are offered.

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

Yes

Comments

The points raised in 2.71, 2.72, 2.73 cover the main issues and we would support the suggestions laid out in 2.72

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

Comments;

Regulation should apply to all sectors at the same time to prevent double standards.

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

Comments:

- The current economic climate and ability for individuals to fund improvements.
- The uncertainty of how GD and ECO will pan out at this early stage
- The fragility of the property market
- The impact of welfare reform on private landlords
- Funding and resourcing mechanisms to facilitate enforcement by the Local Authority

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?
See comments

(b) Should owners be able to pass the sanction or obligation on to buyers?
See comments

Comments

Taking into consideration the points raised in the above response (31) the burden of a sanction may have a tremendous impact on the fragility of the current Housing market.

We would suggest that enforcement of the regulation would be easier if owners were not able to pass the sanction or obligation onto buyers, as this means that compliance would have to be achieved before the completion of a sale.

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?

Comments

The following requires to be taken into consideration when determining a date:

- How the Housing Market is performing within the current economic climate and in turn the financial forecasts by Government over the next 8 years
- The agreed date requires to capitalise on the momentum of incentives, to prevent a slow down on uptake at a date too far in the future.
- Requirement to reduce greenhouse gas emissions as soon as possible.
- Taking account of the key dates laid out in 2.81 will also be essential in this deliberation.

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

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

Comments

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?

Comments

An emphasis on the importance of energy efficiency and lending associated with improved measures

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?

Comments

Not identifying the reduction in fuel bills and freeing up of personal income to spend on individuals families.

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

37. (b) What further action is needed to influence consumers and the market?

Comments

Education at all levels starting in schools and expanding to community education

Establishment of local Energy Efficiency teams and Energy champions

The power of the community is essential in delivering the message

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

In addition to the considerations outlined in the consultation document, we suggest that sustainable neighbourhoods should be designed to be well connected by public transport and active travel. Mixed-use developments, on a walking scale, could mean less commuting, allowing people to feel more connected to their neighbourhood and their neighbours, as well as reducing greenhouse gas emissions associated with private car use.

We would expect the design of sustainable neighbourhoods to consider the impacts of climate change, and provide houses and streets that are resilient and adaptable to the impacts of a changing climate.

Green networks, including space for community growing and active travel / outdoor recreation, are also important elements of a sustainable neighbourhood, and deliver health and well-being, as well as environmental, benefits.

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?

Comments

The primary challenges are laid out well in section 4.10.

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

Comments

- Research funding
- Raising awareness of findings and projects
- Establishing schools of excellence associated with energy efficiency
- Partnerships with energy companies to provide educational training and to establish apprenticeships

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?

Comments

The AHSP is a positive way forward and proposals for future expansion of the scheme are welcomed

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

Comments

The consultation document covers this well and the proposals for the future should assist in the delivery of more greener new homes.

Until demand for greener homes increases, the market is unlikely to provide widespread delivery of more sustainable homes of its own accord, so regulation and higher standards (with flexibility in how to meet them) is likely to be necessary in order to achieve reductions in greenhouse gas emissions.

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

43. (b) If not, What other challenges are there?

Comments

N/A

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

Comments

The emphasis lies in long term commitment assurances as specified in 5.13

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?

Comments

This a key role for the Scottish Government to promote alongside the mentioned partner agencies.

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

Comments

By the Scottish Government working with Local Authorities to promote skills and training opportunities and in conjunction with the bodies listed in section 5.7

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?

Comments

Procurement and contractual conditions utilised to ensure employment is more representative

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.

Comments

No comment