

**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

No comment to add.

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

Prohibitive direct cost  
Prohibitive cost of borrowing  
Lack of clear information regarding payback and cost  
Technology that does not offer a payback early enough  
Off gas properties  
Non trad house types

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

Coordination of funding sources  
Govt programme to assist / force main line gas to all communities above a certain size.

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

Financial assistance.

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

No comment to add

5. (b) How should these be addressed?

No comment to add

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?

LA's to coordinate programmes by area, not tenure.

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

Amalgamation of funding pots and budgets to avoid fragmented admin intensive individual bids.

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

No comment to add.

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

No comment to add

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)?

No comment to add

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?

In the same way that the tolerable standard is enforced.

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 to add.

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 the same way that current enforcement works.

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

Yes, but additional funding would be required to support this programme

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 to add.

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 to add.

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 to add.

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

No comment to add.

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

Option 4 would assist.

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

No comment to add.

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?

No comment to add.

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

No.

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

No comment to add.

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 comment to add.

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 comment to add.

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 comment to add.

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, except that there should be equal access and regulation for all groups.

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

Yes  No

As detailed in para 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  No

As detailed in para 2.75

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

No comment to add

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 to add.

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 to add.

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?

No comment to add.

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 comment to add.

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?

Fear that any further regulation will cause uncertainty and act as a deterrent for growth, investment or house mobility.

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?

No comment to add.

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

No comment to add.

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 to add.

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

No comment to add.

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?

There is a very sensitive balance related to delivering a social – not MMR – programme at the current subsidy rate. Currently land and construction markets are depressed, while funding markets are high – this ratio does allow for the delivery of a high quality product. If / when either of the land or construction markets moves in an upwards direction this will stress the social rent funding model and then add on top further requirements will break the model. In the current programme the additional £4,000 greener fund is effectively taking out 10% of the available units in a LA area – which is required more, more properties or a reduction in carbon.

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

No comment to add.

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 to add.

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

No comment to add.

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 to add.

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

No comment to add.

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 to add.

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 to add.