

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 No

The Comhairle agrees with the vision and objectives set out in the consultation document.

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

- Cost of measures
- Uncertainty about effectiveness of measures
- Physical/technical barriers preventing measures to be used (eg method of construction used, such as poured concrete walls)
- Public not fully understanding the potential benefits

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

- Increase public awareness/perception of the benefits of measures
- Financial incentives
- Demonstration of financial benefits to be gained
- Agent/company/supplier to do all the work on owners behalf

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

- Increased range of information made available to public at national and local level
- Roadshows/demonstrations of products/measures
- Increased media presence
- Support/promotion from range of bodies –councils, advice centres, RLSs
- Well trained installers

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

- National schemes do not necessarily suit a rural/island area (for example the Green Deal)
- Remoteness/distance from supply chains
- There will be additional costs involved eg transportation costs
- Economies of scale not always achievable
- Takes more time to complete works
- In island areas most houses detached –very few terraced properties

- Condition of properties often poor due to climate issues
- Many houses are older than national average
- Construction types often poor (eg single wall construction)
- Measures are going to cost more to fit, especially in Hard to Treat properties
- Starting position usually worse than mainland (more homes in Fuel Poverty to begin with)

The cost of domestic fuel in island areas is crucial to addressing the problem – if prices keep rising, then the benefit of any works/measures done will be negated and families will still remain in fuel poverty.

5. (b) How should these be addressed?

- Custom built schemes taking account of rural situations
- Additional funding/incentives
- Issue of Fuel Costs in island/rural areas key to resolving issues

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?

Local authorities can;

- Build retrofitting into Local Housing Strategies
- Assess local conditions/circumstances through Condition Surveys etc
- Bid for funding directly
- Support bids for funding from partner organisations
- Build case for local issues/circumstances
- Raise awareness of measures/schemes
- Build on success of previous/existing schemes (eg UHIS)
- Act as campaigning body
- Monitor effectiveness

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

The Scottish Govt could;

- Introduce the strategy
- Promote the concept
- Provide funding packages
- Secure funding from other agencies (suppliers. Westminster etc)
- Monitor effectiveness

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

A more focused approach to remote/rural/island areas for national schemes

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

Key issues are raising awareness and ensuring adequate funding packages are in place.
In island areas, the significant cost of domestic heating fuel needs to be addressed in tandem with new measures.

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)?

- Targeting specific groups
- Raising awareness amongst client groups
- Provide delivery through agents (eg Care and Repair)
- Remove any concerns through increased awareness of measures

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?

This should be introduced gradually over time, once there is a better understanding of the issues amongst the public, but could be difficult to introduce and implement at this stage.

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.

n/a

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

This would be problematic at the start of the process, and difficult to gauge and also difficult to monitor/enforce. It could however be introduced at a later stage in the process as public awareness increases.

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

An adequate enforcement/recovery system would need to be in place to ensure that any financial burden does not ultimately fall on local authorities.

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

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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

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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

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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

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

Through provision of new Guidance for all parties.

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

Through a publicity programme aimed at increasing public awareness of the benefits of introducing measures

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?

Consider a link between EPCs and the availability of measures/financial support for measures

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

Ensuring a move towards increased understanding of energy efficiency across all sectors of society.

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

By introducing a balanced 'carrot and stick' approach.

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?

The suggested options would appear to be suitable

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

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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

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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?

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

Yes No

Sale or rental would appear to be suitable trigger points, but substantial structural works would also provide an opportunity to trigger the requirement.

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

Phased by energy efficiency rating

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

Impact on small local authorities, in terms of work load/capacity should be considered

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

Sanctions could be a useful tool but would need to be carefully considered, in terms of scope and the timing of introduction.

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?

2015

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?

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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?

Change in understanding/awareness of energy efficiency issues in general from Valuers and Lenders

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?

Caution/concern amongst Lenders due to the current economic climate

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?

Encouraging builders to adopt new practices/technology & improve marketing

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

- Community involvement in design/planning
- Improved public transport links/opportunities
- Better community facilities within a community/settlement

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?

Encouragement to get early adopters needs to include financial incentives

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

- Increasing awareness of Energy Efficiency issues in the sector
- 'Green' training opportunities across the board in the construction industry
- Support for builders to try out new technology – (subsidised pilot schemes etc)

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?

Provide realistic and sustainable levels of subsidy

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

Increased awareness is a key factor, along with opportunities to try out innovative pilot schemes

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?

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

Ensure a suitably sized workforce, with enough people wanting to go into all parts of the construction sector

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?

- Increased advertising of training opportunities/course
- raising awareness through professional bodies

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

- Increase awareness of opportunities
- Targeted training
- Use of Equality Impact Assessments

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?

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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.

Difficulties:

- Smaller workforces
- Lack of 'on island' training opportunities
- Cost of travel to attend training
- Small size of building firms
- Reluctance to move away from 'tried & tested' techniques

Addressed by:

- Encouraging more apprentices across all trades
- Encouragement to take part in specialist training of new energy efficiency measures, as part of apprenticeship training
- Subsidised training opportunities for small firms
- Encourage more partnership working amongst smaller firms –sharing apprentices/sharing costs