

Housing Sustainability
Scottish Government
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Your Ref: [[Click here for Ref](#)]
Our Ref: SHS

If telephoning or calling please
ask for:

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25th September 2012

Dear Sirs

Consultation Response Scotland's Sustainable Housing Strategy

I enclose our response to the consultation proposals within Scotland's Sustainable Housing Strategy. Overall we welcome the proposed Sustainable Housing Strategy and its intentions to reduce in line with Scottish Government commitments Scotland's carbon emission reduction. However, we have concerns;

- It is our understanding that Social Housing has already or close to achieving carbon emissions saving in excess of the general 42% emissions 2020 target. This does not include the emissions savings achieved from the loss of some 300,000 social homes (regeneration, demolition or sales under RTB) since 1990 that must also help in the sectors reduction in energy use and emissions. The recent report from the Scottish Government "Use of energy in the home" stated that 37% savings in CO₂ emissions has been achieved (at 2010). We would ask is there a need for the social housing standard?
- The proposed delay, until post 2015 of setting up any minimum energy efficiency standards in the private sector (even the min SHOS) will only further distance the inequality of accommodation

between the private and social rented sectors. Is this what the Scottish Government wants?

- We can see no evidence that supports the introduction of area base programmes as suggested by the Fuel Poverty Forum or accept that people in fuel poverty may have to wait up to ten years for help.

The suggestion that the Retrofit programme will focus on fuel poor areas first does raise the question as to how you will be able to identify such areas, especially as many rural areas such as Dumfries & Galloway whilst acknowledge as an area of fuel poverty fails to appear on many indexes of deprivation.

One final question, what happens to the people employed in an area who are delivering the propose National Retrofit Programme in say Dumfries & Galloway after the area is completed? Where will they have to travel to in Scotland if they wish to continue in employment is this sustainability?

We have included under the appropriate question on your respondent information our individual comments.

Yours sincerely

James Shirazi
Director of Investment & Regeneration

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.

No ✓

The National retrofit programme sound wonderful but that's all it is a sound bite especially when you look at the progress so far.
Standards – Social housing was promised many years ago that SHQS would apply to the private rented sector this continuing unfair playing field and non-action before 2015 will further distance the inequality between private and social rented sectors especially if the EES4SH is introduced.

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

Not forced to do it! (Régulation)

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

Introduce legislation and standards

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

Not free cash – easy access to quality organisation that will do it right

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

Understanding and priority – generally these areas do not appear on deprivation index – access to support – consistency of message and time to deliver

5. (b) How should these be addressed?

Joined up approach - Council lead target team that tackles areas at a time long term goal reinforced by local strategy and legislation

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?

Consistent leadership

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

Monitoring, introduction of legislation and setting challenging programme

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

Introduction of legislation

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

Introduction of legislation

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)?

You can't – accept that some people will not join in

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?

Same standard for all homes – via building regulation and legislation

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

No ✓

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

Should this not be an Energy Efficiency hierarchy of needs?

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

Not sure that LA have the staff to enforce this

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

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

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 ✓

Simple streamlined process low cost

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 No

Comments

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

The question should be how the Government can make sure that all mixed tenure blocks are factored – then tackle issues after period of reflection from the new registration process.

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

Little – high fuel costs are the only way

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

Yes a single standard for all homes

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

The EPC is what it is and as a tool unlikely to change behaviour

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

Comments

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

As a Carrot linked to lower Council tax?

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?

If it's about meeting climate emissions target then it has to be an energy standard.

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 ✓

Comments

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 ✓

One for all and all for one

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

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

Yes ✓

Any request for Building warrant or planned improvement

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 ✓

Rolled out as one but phased to come in for 2020

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

No comment

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 ✓

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

Yes ✓

B Buyers obligation only within set time limit

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?

Today,

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?

Maybe a TV programme on finding homes that are energy efficient called – energy efficient - energy efficient - energy efficient

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

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?

No comment

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?

No ✓

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

No action

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

You can't design only support

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

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

Comments

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

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

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?

Comments

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

Comments

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

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

Comments

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

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