

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 type="checkbox"/>
Private sector organisation	<input type="checkbox"/>
Third sector/equality organisation	<input checked="" 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

Comments

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

Comments

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

Comments

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

Comments

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

5. (b) How should these be addressed?

Comments

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

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

Comments

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

Comments

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

Comments

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

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?

The Electrical Safety Council (ESC) would fully support the introduction of a single mandatory condition standard across all housing tenures. In particular, we believe that the current distinction between the basic 'tolerable standard' which applies to all properties, and the supplementary 'repairing standard' for privately rented properties, is confusing and leads to inconsistent results, particularly with regard to electrical safety.

For example, one way of meeting the 'tolerable standard' in relation to electrical installations is compliance with the technical rules in BS 7671, Requirements for Electrical Installations (otherwise known as the Wiring Regulations), as published by the Institution of Engineering and Technology (IET). The IET recommends inspection of electrical installations in rented properties on change of tenancy or at least every 5 years. Given that the average lease period is 1-2 years, this is a fairly demanding recommendation. However, in contrast, the supposedly more stringent "repairing standard" requires amongst other things that "electrical installations are in reasonable repair and proper working order" but gives no specification as to on-going maintenance requirements.

Furthermore, statistics highlight that despite the 'repairing standard', the condition of properties in the private rented sector (PRS) is significantly worse than for other tenures. The 2010 Scottish Housing Survey found that 67% of privately rented dwellings had disrepair to critical elements (which presumably include electrical installations), while 3 in 10 were found to be in extensive disrepair. This compares unfavourably with owner occupied

(56% with critical disrepair, 1 in 4 with extensive disrepair) and housing association (46% with critical disrepair, 1 in 5 with extreme disrepair) properties. We believe the differences in quality are created in part by the confusion alluded to earlier, with a lack of knowledge amongst both landlords and tenants of their responsibilities.

The ESC believes that there is no justification for discrepancies in standards between properties on the basis of tenure. Electrical safety is of the utmost importance regardless - figures from the Department for Communities and Local Government show that in the UK in 2010-11 there were 20,284 accidental house fires caused by electricity. Of these, 2,564 were caused by electrical installations and 17,720 by electrical appliances, leading to 48 deaths and 3,324 injuries. The proportion of accidental house fires caused by electricity has grown in recent years (from 49% in 2004, to 51% in 2007 and 53% in 2010) to the point that it is now their number one cause. No tenure information is gathered for these incidents but we believe it is reasonable to expect that householders should enjoy the same safety standards, irrespective of the tenure of their property.

The risk of electric shocks and electrical fires can be countered in a number of ways. While the maintenance of wiring through five-yearly inspections by a competent electrician would be an important step forward, the ESC also advocates more effective protection through appropriate levels of Portable Appliance Testing (PAT) and the installation of consumer unit residual current devices (RCDs). The latter two provide a greater emphasis on improving the safety of properties, whereas the former helps to ensure good conditions are maintained.

In our response to the recent consultation on the Private Rented Sector, the ESC suggested measures that would avoid placing unnecessary burdens on private sector landlords whilst still delivering health and safety benefits, through partial implementation of the IET's Wiring Regulations. We suggested that wiring inspections should be required every five years, with visual inspections undertaken upon change of tenancy (if within this period). The ESC believes this should be included in the requirements for any mandatory condition standard.

It is our understanding that this consultation looks beyond the 'tolerable standard' to include improvements that landlords or owner occupiers should make in the course of other renovations. Within this objective, the ESC would recommend a requirement for the installation of consumer unit RCDs when other major electrical works are carried out. This could be enforced through Codes of Practice for qualified electricians or by modifying conditions on planning permission for larger-scale works.

The ESC believes that the above measures would greatly improve the safety of properties and have the potential to save lives.

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.

The Electrical Safety Council (ESC) is concerned to note that there is no reference to safety in the checklist. The safety of families is of paramount importance, and maintaining a home free from disrepair is one way of the most effective ways of protecting people against unnecessary injury. Whilst this consultation has a focus on sustainability and energy efficiency, the health and safety of residents (whether tenants or owner occupiers) must also be an essential dimension of quality. Our own expertise lies with electrical safety but other considerations such as eliminating damp, regulating temperature and keeping out vermin would also fall within general health and safety justifications for home renovation.

Given this, the ESC would suggest a more explicit reference to safety be made in Point 2, so that it reads:

"Make sure that work is done properly because poor quality repairs may be ineffective *or unsafe* and can cost more in the long run."

Ensuring that home owners understand the underlying reasons behind the Government's recommendations will be crucial to securing buy-in, and behaviour change, on this matter.

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

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

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 No

Yes, as this could help to ensure that safety standards in any given property are maintained to an acceptable level and could stipulate a means by which this could be achieved in terms of electrical safety ie five-yearly wiring inspections.

We would also strongly urge the government to consider further stipulating what is required for the fulfilment of householder responsibility towards 'reasonable repair', so that standards of housing are equal across Scotland, and the risk of uneven implementation by Local Authority area is eliminated.

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

Comments

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

b) Yes, as this would provide a robust means by which to enforce any improvements required for any unsafe dwelling, rather than a select sample.

This complements the point made earlier regarding householders being entitled to decent housing no matter their tenure (or location). It is particularly important for social and private renters, who are not completely responsible for safety provision and living conditions in the homes they occupy.

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?

Comments

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

Comments

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

Comments

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

Comments

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?

Comments

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

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

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 No

Comments

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

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

Yes No

Comments

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

Comments

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

Comments

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

Comments

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

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?

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

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

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?

Comments

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

Comments

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