

**4. Please indicate which category best describes your organisation**

**(Tick one only)**

<b>Executive Agencies and NDPBs</b>	<input type="checkbox"/>
<b>Local authority</b>	<input type="checkbox"/>
<b>Other statutory organisation</b>	<input type="checkbox"/>
<b>Registered Social Landlord</b>	<input type="checkbox"/>
<b>Representative body for private sector organisations</b>	<input type="checkbox"/>
<b>Representative body for third sector/equality organisations</b>	<input type="checkbox"/>
<b>Representative body for community organisations</b>	<input type="checkbox"/>
<b>Representative body for professionals</b>	<input type="checkbox"/>
<b>Private sector organisation</b>	<input type="checkbox"/>
<b>Third sector/equality organisation</b>	<input checked="" type="checkbox"/>
<b>Community group</b>	<input type="checkbox"/>
<b>Academic</b>	<input type="checkbox"/>
<b>Individual</b>	<input type="checkbox"/>
<b>Other – please state...</b>	<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

Cost

Disruption

Lack of awareness and interest

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

Comments

Measures need to be fully funded. This has been proved by comparing free loft and cavity insulation area based projects with similar initiatives which require a small contribution from the householder of around £100 per measure. The difference in level of uptake between the different approaches is as much as five to ten times as many installations under a free scheme. It is essential that work can be covered by guarantees – this helps ensure there is an understood value to the measures being installed and that the installation and the product is correct for purpose.

Properties with shared ownership can be difficult to engage all owners/occupiers – some subsidy may be required where shared ownership is a problem.

Cavity constructions are well understood and eligible for improvements with existing funded schemes. Other types of homes need to be catalogued and ways of improving these properties standardized. A national register of property types and improvements needs to be created and widely distributed.

Landlord registration schemes can be an essential way of promoting and ensuring energy efficiency is taken seriously by private landlords.

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

Comments

A flexible whole house approach.

Also see previous comments re national register of house types and the need to offer standardised systems. This requires easy access for property owners and tenants. The range of information is currently difficult for home owners to navigate.

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

There must be a commitment to include rural areas in any campaigns. The costs can be much higher in rural areas – you rarely achieve the economies of scale however the Energy Agency has found that often areas which have not previously been targeted do result in extremely high levels of uptake of measures e.g. remote isolated rural communities. 90% re involvement of households and businesses in Hadyard Hill area in South Ayrshire (880 properties)

The variety of property types in rural areas – from timber framed to solid wall provides challenges for categorising the work required and the potential carbon/energy saved. However it should still be possible for Government to offer standardised methods to improve and measure the effectiveness of measures for these dwellings. Once standard systems are developed, the costs associated with application of these will be measurable.

There are huge advantages of developing an effective supply chain model and working with local organisations and installers to maximise the benefit for local work and expertise in rural areas. Some subsidies may be required initially to up skill those working in rural areas to ensure they have the skills to fully participate in retro fit programs. Subsidies should be available to local companies who are clearly supporting the local economy and residents.

5. (b) How should these be addressed?

Comments,

Where necessary providing additional funding for the extra cost of delivery.

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

Local Authorities have experience through three years of UHIS to extend the successful model and apply it to hard to treat properties. They should be allowed the flexibility to either manage the project themselves or where many have done in the past, appoint a local energy efficiency charity such as the Energy Agency who have the necessary expertise in this area.

We feel strongly that new private sector routes to funding through the Green Deal and ECO should not mean the Scottish Government should pull back on its commitment to tackling fuel poverty and climate change under the assumption that these new funding routes alone will deliver on commitments made within a Scottish context.

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

#### Comments

The role of the Scottish Government should be to persuade Utility companies to commit funding to this programme and provide guidelines that are clear, but allow Local Authorities flexibility to direct funding to the areas they know to be most in need. A sizeable budget for tackling fuel poverty should be maintained and schemes that work alongside the area based approaches should be put in place. This would tackle fuel poverty for people who just miss out from an area based scheme or who can't wait for the scheme to come to their area.

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

#### Comments

Local authorities should be encouraged to report on all housing stock in their geographical area regardless of ownership. This would become an increasingly effective way to encourage the focus of activity for local councils to achieve high levels of uptake in private and rented sectors – this could be an indicator within the CPP reporting. Current incentives are good for local authorities under UHIS – this could be covered by penalties for inaction on carbon emissions.

It could demand a minimum percentage spend of CERT/CESP/ECO type funding from energy utilities, to ensure Scotland has a 'fair share' of funding proportional to the number of household energy customers.

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

#### Comments

Longer term budget commitments and targets. Funding to improve and up-skill the labour capacity in Scotland. Training programmes for existing contractors to diversify into new types of energy efficiency installations.

Many of the issues experienced with exacerbated dampness problems resulting from insulation improvements are the result of inadequate education over the need for proper ventilation alongside the improvements in fabric insulation. Ventilation is often over looked in the pursuit of more insulated and therefore air tight dwellings. This highlights the need for adequate householder education about the impact on and use of their home following installation of 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)?

#### Comments

Ask that Local Authorities market the programme effectively and make best

use of available information and data – utilising effective links with community planning partnerships.  
Using existing networks and finding effective ways of informing frontline advisors, and professionals such as social workers, as to the assistance available to their client groups.

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?

Comments

The single standard could be enforced at point of resale or change of tenant. It is essential to highlight the need to mainstream and provide proper face to face energy advice.

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.

Comments

In terms of a building being structurally sound, ventilation should come before or at the same time as insulation. A property that has insulation retrofitted without addressing ventilation could deteriorate due to condensation.

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

Comments

This should be limited to the most basic measures such as loft, cavity and heating. High cost measures such as solid wall insulation would be difficult to enforce unless it was fully funded.

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

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  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

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?

Comments

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

Comments

Don't just require an EPC to be generated, regulate for action to be taken. Random checks also need to be carried out on accuracy of EPCs and penalties incurred where these are incorrect.

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

Comments

Yes

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

Comments

When used correctly EPCs are excellent tools with little adjustment.

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

All options have their benefits. A flexible approach that takes one or more of all four options into account should be adopted.

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 x  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

Pilot programs need to be encouraged linking colleges industry and local organisations – the Energy Agency is operating one such pilot with external funding.

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 We expect to have relevant information to assist with this response in several months time as a result of current pilot at initial stages.

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

Comments As above

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 Essential to deliver appropriate easily accessible training for local companies who can deliver in the market.