

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 checked="" 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

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

Home owner and landlords are confused by the complexity of the technology and measures available to make their properties more energy efficient.

There is insufficient knowledge and understanding amongst homeowners as to why it is to their benefit to improve the energy efficiency of their homes.

In addition there is an inbuilt reticence amongst homeowners to engage with door step salesmen who try to sell them a "green solution".

This all adds up to extensive apathy amongst homeowners and private landlords to the concept of installing energy efficiency measures.

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

A carrot and stick approach needs to be adopted to overcome the barriers.

The "carrots" could include;

- **5% vat on retrofit energy efficiency improvement work to existing housing stock**
- **Reduction in council tax on homes that meet the appropriate standard**
- **Free independent energy assessment for every house so that homeowners have confidence in choosing the correct measures for their particular house**

The "sticks" could include;

- **A requirement for every home to have a current Energy Performance Certificate (EPC).**
- **Mandatory requirement for a Building MOT that addresses the basic wind and watertight condition of a home.**

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

Homeowners and landlords need help to understand what the appropriate measures for their properties are.

This must not be left to the market but rather a free comprehensive independent energy assessment for each home that wishes it. This will increase the confidence of the homeowner that they have independent expert advice on the appropriate measures for their home.

This information can then be used to secure the appropriate energy efficiency measures from the market. The homeowner or private landlord will be in control of the process rather than being at the mercy of a salesman.

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

As per answer to question 4

5. (b) How should these be addressed?

As per answer to question 4

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 will play a key role in the retrofitting of Scotland's existing housing stock. The Federation of Master Builders (FMB) expect a consistent approach to delivery by all local authorities and one that sets out to positively support locally based SME construction companies.

The FMB cautiously welcomes Homes for Scotland's initiative and looks forward to considering their research when published. The FMB is wary of any scheme that "offsets" responsibility to build new homes to the highest commercially possible standard of energy efficiency.

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

The Scottish Government has a strategic role in securing funding for the National Retrofit programme as well as ensuring that local authorities deliver the programme in a consistent and efficient manner.

Guidance has to be provided to local authorities by Scottish

Government on the requirement for local companies to be an integral part of the delivery of the National Retrofit Programme. The Scottish Government must ensure that PQQ's used by local authorities must not preclude or be onerous for small & micro companies.

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

No comment

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

Vastly improved consumer awareness and knowledge of the financial benefits of improved energy efficiency of their homes is desperately needed if the Scottish Government is to attain its energy efficiency targets.

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

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 Private sector will provide the greatest challenge for a single mandatory condition standard. There needs to be a cultural change where private owners of property accept that it is in their best interest to maintain their property to the mandatory standard.

Persuasion, education and financial reward will be more cost effective than the blunt tool of statutory enforcement.

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

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

No further comment

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

No further comment

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 further comment

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 further comment

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 further comment

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 further comment

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

No comment

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

The Federation of Master Builders believes that a carrot and stick approach needs to be adopted to raise the importance of energy efficiency with home owners.

The “carrots” could include;

- **5% vat on retrofit energy efficiency improvement work to existing housing stock**
- **Reduction in council tax on homes that meet the appropriate standard**
- **Free independent energy assessment for every house so that homeowners have confidence in choosing the correct measures for their particular house**

The “sticks” could include;

- **A requirement for every home to have a current Energy Performance Certificate (EPC).**

Mandatory requirement for a Building MOT that addresses the basic wind and watertight condition of a home.

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

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

No comment

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

No comment

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

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 further comment

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 further comment

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 comment

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

Yes No

No comment

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

Rollout of regulation across the owner occupied and PRS sectors should be carried out all at once. This minimises the likelihood of confusion as to what standard is required - and by when.

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 No

(b) Should owners be able to pass the sanction or obligation on to buyers?
Yes No

No further comment

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

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

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?

Yes No

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

No comment

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

No comment

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 additional challenges to be noted

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

Product research & development is costly. The banking industry view the construction industry as a “high risk” industry and are currently engaged in a programme of reducing their exposure to the industry. A prolonged credit squeeze on construction companies will negatively impact on their ability to invest in new technologies and methods of construction.

The Federation of Master Builders believe a research & development fund needs to be created to allow innovative construction companies to bring new products to commercial reality. This could be linked to co-operative work with Scottish Universities and FE colleges.

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?

No comment

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

Whilst the large volume house building companies will deliver the majority of Scotland's new homes over the next decade the countless small building companies, self builders and rural builders who will build a substantial number of new homes between them each year must not be ignored.

This significant source of new build homes must be identified and included in all Scottish Government initiatives to promote greener construction methods.

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?

Chapter 5 partly identifies the key challenges however the Federation of Master Builders considers there are additional challenges for SME construction companies in this area. These challenges relate to consumer demand, business confidence, provision of information and training provision.

In terms of consumer demand, Scottish SME construction companies are cautious to invest in skills and training, such as the Green Deal, as they are uncertain that consumer demand is sufficient to justify extra training costs. The general public is largely unaware of the Green Deal and there have been no public awareness raising campaigns around this to date. If employers can see that there is clear consumer demand it gives business justification for investment in skills and training in these areas.

A further challenge originates in business confidence. At present, the majority of Scottish SME construction companies lack the confidence to invest in skills and training in retrofitting and new technologies. The Federation of Master Builders agrees with the analysis that this loss of confidence can be partly attributed to a loss in trust in UK Government incentives, such as the Feed-in-Tariff for solar PV projects; however, we consider weak confidence to invest in skills and training has been compounded by the recession in the construction industry. For example, the Scottish construction industry has contracted by 3% in 2011-2012; there is a lack of appetite to train staff at extra cost to the business if it is unclear whether there is a business benefit in doing so. To successfully realise the opportunities identified in this consultation, it will be crucial to involve SME's; over 90% of all

construction companies in Scotland are SME's and the majority of Scotland's construction apprentices are employed by these organisations.

An additional challenge concerns the provision of information to the construction industry, particularly the detailed information about new initiatives and schemes which will give them confidence to invest. At present micro and small construction companies have real difficulty in filtering which initiatives and schemes are/aren't important to their business. A central information portal in an easily accessible format would be beneficial.

Future training provision is a concern for employers. Presently there is a significant reduction in demand for construction courses due to the current recession resulting in an unfavourable impact upon the available capacity across all colleges. This could be further compounded by the rationalisation agenda in the review of vocational education. There is concern that college capacity that is lost in the short-term will be difficult to re-establish once construction training increases when the economy improves.

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

To enable Scottish companies to take advantage of the opportunities offered in building new sustainable homes and upgrading existing homes, it will be necessary to re-skill and up-skill existing workers in the construction industry. At present the majority of funding is targeted towards the 16-19 year old age group through Modern Apprenticeship programmes.

The Federation of Master Builders considers it necessary to increase funding to support existing construction employers to re-train and up-skill in these new techniques. In the current economic climate, SME construction companies will struggle to meet these costs and government funding could/should support this programme.

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?

There are well established and well recognized construction organisations operating in Scotland that traditionally cascade information on funding and support for skills and training to construction companies. This communication network can be improved but does not need to be re-invented.

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

Women and ethnic minorities are under-represented in the construction industry. The Federation of Master Builders believes the correct approach to gender and ethnic diversity in the construction sector is through the promotion of role models in the industry.

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?

The highlighting of clear career pathways and demonstration of actual and possible career progression in both tradition and new and emerging technologies will go a long way to improving representation in the construction industry.

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.

The main difficulties relating to skills and training in remote and island areas are a lack of appropriate training provision and the subsequent requirement to travel large distances to access the required training.

Another difficulty concerns the increased costs of running training courses in remote areas. These issues can be addressed with a combination of measures such as online courses (where appropriate) and government funded/subsidised training courses in rural communities. The Federation of Master Builders would recommend engaging directly with local employers in these areas as many of them will have innovative and practical solutions to some of the key challenges which they face.

The Federation of Master Builders would be willing to facilitate contact with SME's in remote areas to see if they would be interested in taking part in discussions with Scottish Government.