

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

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?

Answers to QUS 6 - 9

The emphasis on retrofitting of the existing stock of housing is welcomed and supported. This policy position is supported by the evidence base within the document which states that around 85 percent of homes in Scotland today should still be in use when the final emission targets are to be met in 2050. This is considered significant and important. The contribution that can be made through new construction activity is significant, however in the context of energy consumption overall, it is statistically more limited.

A significant amount of construction activity takes place in the form of alterations to existing buildings. In most Planning Authorities, this accounts

for the vast majority of Planning and Building Warrant applications. It would be useful to quantify the scale of this activity in relation to issues of sustainability and energy efficiency.

Not all of such activity is controlled through Planning Permission although it is all controlled through Building Standards. Given the scale of this construction activity, it would be useful to ensure that it conforms to the latest and therefore highest standards of Building Regulations in respect of sustainable development. Consideration should be given to the removal of the ability to undertake construction based on Building Warrants obtained significantly earlier than construction commencement, and therefore based upon lower standards of sustainable design. Further consideration should be given to regulating through Building Standards, a requirement to retrofit the existing building when applications are made for building alterations.

The majority of householder construction activity is in the form of single one off projects undertaken by local tradesmen and building firms, or on a self build basis. Such construction activity can be resource inefficient in terms of energy, materials and waste to landfill. Consideration should be given to the implementation of measures to address this activity including awareness campaigns, attitudinal change, further regulation, and further increases to landfill tax.

The use of District Heating systems in both existing stock (mainly Local authority) and within new development, requires to be further developed. This will included improving knowledge and awareness, sharing of best practice, development of explicit planning policy support at a national level, and development of expertise.

At Paragraphs 2.22 and 2.23 the report states that there are approximately 70,000 homes in Scotland are empty. This is a significant number which accounts for 15% of the homes the report states will be required to 2035 (450,000). As such, consideration should be give through the Scottish Empty Homes Partnership to the use of compulsory purchase powers, in order to return these homes to active use. This would contribute to regeneration activities and the reduction of the new build housing requirement, and thereby reduce resource and land consumption.

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?

Comments

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

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

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

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

To introduce minimum standards for the existing private stock would be ambitious but could yield the improvements sought.

In order to encourage broad acceptance of this level of regulation, attitudinal and behavioural change will be required.

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

The point of Building Warrant application provides a further potential trigger. A known risk would be that the additional cost of sustainability measures, may deter potential applicants from building alterations.

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?

Attitudinal and behavioural change is an important strand of policy development. There requires to be a transparent debate that recognises that there are increased costs of sustainable construction, but that those costs will yield short term benefits in terms of comfort and enjoyment, and longer term benefits in terms of environmental costs and climate change.

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

QUs 38 -42.

The Scottish Government has produced design guidance on Designing Places and Designing Streets. Imbedding good design within development, that embodies the principles of Designing Streets, and that meets high standards of sustainable design, continues to be challenging for developers and for planning decision makers. In the current economic climate which has impacted severely on the development industry, there is an understandable lack of willingness from the development industry to adopt higher and more costly standards of design.

The government's direction of travel in terms of the sustainable design

agenda is fully supported, however there has to be an open and honest recognition of the impact on development cost, including skills development and resource costs. In order to address these challenges, further clarity and more specific policy guidance would be useful from Scottish Government. Again attitudinal change is also important to encourage the acceptance of development models that cost more, meet the sustainable design agenda and that may therefore differ from conventional layouts and standards. Regulation will ultimately be the most effective tool but will be more acceptable if attitudes on this issue have changed.

The Strategic and Local Development Plan's have a role to play articulating and setting the policy context for standards of design and further detail can be provided within Supplementary Planning Guidance including Development Briefs. Appropriate considerations include the siting, layout, design and orientation of development. Additional considerations include Positive policy support for District Heating and micro-generation.

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?

Qus 43 – 48

Alongside skills development, further quality control, regulation and enforcement may be required in order to fully imbed the higher standards of construction required.

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