

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.

Yes No

The vision and objectives appear appropriate. However, reference could also be made to existing initiatives and good practice at local levels.

For instance, through GHA's investment of over £1 billion in its housing stock has made a significant contribution to improving the energy efficiency of Glasgow's housing stock. GHA is also currently working upon a number of activities with partners aimed at making Glasgow more sustainable such as:

GHA has installed 500 photovoltaic systems across Glasgow to reduce Fuel Poverty. In addition to our dedicated Fuel Poverty Advisor service which delivers individual advice and support; Since inception the service has achieved a cumulative saving through tariff switching or correction of nearly £600,000.00

GHA also renovated a number of high rise – 'hard to treat' – blocks in the city, retrofitting a Combined Heat and Power district system in conjunction with our extensive ongoing external wall insulation programme.

We build all our new homes to Eco Homes 'Very good' Standard. We have also developed The Glasgow House, which is designed to have a total annual heating cost of around £100 when built in 2010

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

There are several identifiable barriers, including:

- Apathy among some owners and landlords
- Issues with mixed tenure blocks with several owners
- Difficulties in some cases of establishing ownership
- A lack of understanding of responsibilities of ownership
- Procurement transparency
- Older owners who are "asset rich but cash poor"
- Landlord issues with gaining access to properties
- Issues with deed amendments
- Currently restricted access to loan finance
- Trading Standards undermined by 'rogue traders'.
- Lack of knowledge/understanding of 'pay-back' in terms of energy costs saved by measure installed.

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

Some clarity on what people are likely to save, in monetary terms, might encourage people to install energy efficiency measures. The UK Government's Green Deal, where consumers pay back the cost of energy efficiency improvements as part of their energy bills, might be further publicised in the Scottish context.

The Green Deal's 'Golden Rule', where the expected financial savings should be equal to or greater than the instalment costs could be further clarified and costed if being considered for Scotland as this could act as a clear incentive for owners and landlords.

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

Given the diversity of Scotland's housing system, it is difficult to summarise the support people need. Measures, however, should be focused on the issues identified above, as well as others that may be identified through this support

Particular thought should be given to specific groups within the population, such as those with disabilities and older people. A full equality impact assessment of the strategy would be useful in identifying the specific support required by different groups.

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 GHA's stock currently comprises of properties in urban areas, landlords and agencies who are based and operate in remote areas are best placed to accurately answer this question.

5. (b) How should these be addressed?

See (5a)

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?

GHA would be supportive approaches aimed at working with local partners, including the city council, to look at local sustainability solutions.

Any activity should be based upon existing community planning mechanisms and organised in a collaborative way.

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

The Scottish Government's role should play a leadership and facilitating role, supporting the local delivery of a programme. A greater presence of the Fuel Poverty Forum should be incorporated into the programme to ensure the 2016 target is met and recording of Fuel Poverty alleviation is made.

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

GHA would have to be aware of the specifics of the devolution powers to accurately answer this question.

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

This is a very broad question to answer meaningfully and succinctly.

It is noteworthy to comment that it is a time of change for the housing system in Scotland. The Homes Fit for the 21st Century refers to the growing role which the private rented sector will continue to play in the Scottish housing system.

Some important legislation has come into effect recently which is relevant to the Private Rented Sector, such as the Private Rented Housing (Scotland) Act 2011 and the Property Factors Act 2012. It is perhaps important to appreciate the drivers of change in the sector in other areas when planning actions in regards to sustainability.

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)?

As commented above, a comprehensive equality impact assessment on the Strategy should help to flesh out specific issues in maximising benefits to all.

One general comment is that the Scottish Government might consider extending the eligibility criteria beyond those housed in private accommodation, i.e. to RSL tenants.

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?

Disproportionate standards currently apply to the social rented sector compared to homes in other tenures. Given the growing importance of the Private Rented sector in meeting housing demand and owner occupation having been the most popular housing tenure, this redressing this imbalance should be a priority.

However, enforcing any condition standard would be a major challenge in changing attitudes and would take substantial resources. Given the diminishing fiscal resources that the Scottish Government and Local Authorities. Is additional enforcement something that can be taken on currently?

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.

One of the key stated purposes of the Strategy is to promote culture change. Should energy efficiency not, therefore, be a constituent part of the structural integrity of a building?

At first glance the checklist appears to place sustainability at a low position of priority on the checklist.

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

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

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

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

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

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

It may be advisable to follow option 1. The reason for taking no action is that the new regulations in the Property Factors Act have only just come into effect and it might be advisable to see how effective these are in raising standards in factoring in the first instance.

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

Some evaluation into the effectiveness of Energy Reports in Home Reports in regard to shifting attitudes might be useful in planning additional actions

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

If climate change targets are to be met, then yes. However, the introduction of standards should be a long term process, given the challenges that face the sector.

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

The alterations incorporated into the SAP 9.91 update and Green Deal amendments will improve much of the information, layout and recommendations to improve.
In Scotland it may be especially helpful to include a contact to the National Retrofit Programme funding mechanism when this commences in 2013.

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

Affordability should be considered. Many owners, particularly elderly owners, might be considered 'asset rich but cash poor', and unable to pay for expensive rendering work.

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

As with the answer to question (3) above, some clarity might be given to what the benefits are for householders of investment in energy efficiency alongside with regulation.

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?

It would be logical looking forward that all sectors follow the same approach in the long term. Applying a version of the SHQS criteria seems a sensible way in which to proceed.

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

As noted above, the same approach for all sectors should be the aspiration moving forward.

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

There should be no difference in the standard of different sectors. However, given the challenges, this is likely to be a long-term process.

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?

A comprehensive equality impact assessment should identify any specific issues.

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

Yes No

Standards should apply to all properties. Additional trigger points at point of sale might act as disincentives in difficult economic times.

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

Varying standards over time, encouraging incremental improvements, are probably more likely to be achievable given the challenges faced in making Scotland's housing stock energy efficient.

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

It needs to be clarified who the regulating body will be. Is it; the Scottish Government, Local Authorities, the Scottish Housing Regulator or another agency?

The main issue would appear at this stage to be who the regulating body is, and if they will be sufficiently resourced to carry out this function.

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

Regarding (a) clarity is needed on what the sanctions are and who imposes them.

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?

2015 appears appropriate. However, more detail is required regarding the communications timetable and the intended way of introducing regulations to answer this accurately.

That the regulations are fit for purpose and fully workable are more important than any specific deadline.

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?

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?

Organisations such as the Royal Institute of Chartered Surveyors and the mortgage lenders themselves are probably best placed to answer this question.

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?

See answer to 35.

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?

As with responses to other questions, good information, presented in a clear and unambiguous way, on the monetary benefits of investment in sustainable homes is required to influence consumers in the market.

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

Require Green Infrastructure solutions within the planning of water management and surface run-off.
Incorporate elements of ECO-homes category 9 Ecology into initial Building Warrant permissions.
Markedly increase requirements within Scottish Building Regulations Section 7 Sustainability.

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?

Develop supply chain readiness that supports specification of new technologies, to move from 'immerging' to established methodologies.

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

Primarily prefabrication is not competitive with conventional building while the market for construction is so depressed. As demand increases the price to build will rise, at which point prefabrication will be an alternative.
A requirement for developers to reduce onsite waste would be a good start, as prefabrication retains waste at the factory.

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?

Take into account a whole life funding calculation that includes revenue from Feed-in-Tariff and Renewable Heat being returned to the Government rather than held by the affordable housing developer.

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

This is by definition something that would come through obligations set by regulatory compliance targets, such as zero carbon homes.

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?

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

One suggestion is to incorporate these principles into an earlier school curriculum such as Standard Grades or Highers.

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?

Involve the trade regulating organisations such as Gas Safe in the development of opportunities.

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

Specific issues would be revealed through an equality impact assessment.

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?

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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.

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