

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 x No

We believe the vision and objectives reflect our shared goals of alleviating fuel poverty and reducing carbon emissions.

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

Hard-to-treat properties limit and prevent energy efficiency works from being progressed, in addition to their excessive costs. Issues which often apply more than once to an individual property include:

- Off-mains gas limits economic fuel choice
- Timber framed/system built houses are difficult to insulate
- Rural nature of outlying properties
- Tenant opt-outs (usually stemming from intrusive nature of works or lack of confidence in energy efficiency technology)
- Property type (blocks of flats with varying tenure)
- Utility tariff availability and structuring
- Private landlords are often reluctant to spend money in order to reduce their tenant's bills
- Funding is very complex and bureaucratic.

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

Possible assistance in the form of:

1. Hard to treat property characteristics:
 - More appreciation and lenience on targets for properties which have multiple hard to treat characteristics; offer an alternative strategy such as tenant energy advice referrals
 - Grant assistance for more expensive measures (i.e. solid wall insulation).
2. Sustainable and economic fuel availability and supply chain:
 - Central electricity tariff review
 - Comprehensive domestic biomass research project undertaken and support network established – this should underpin confidence and stimulate rollout of domestic and community biomass installations.
3. Tenant aspects:
 - Clearer and more definitive guidance on successfully combining tackling fuel poverty with achieving energy efficiency targets.

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

The costs of works are often high and the nature of works often very intrusive. Landlords and tenants need to be able to access the best possible advice and have a simplified means of identifying funding available to assist them with their economic choices.

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

There are significant costs attached to contractors working in rural areas and we have experienced high tender prices as a result. Rural households can also feel isolated from advice and assistance both before and after works are carried out. We have attached as an appendix a recent paper on the Energy Assistance Package (EAP). This was produced by the Affordable Warmth Partners Group which meets in Highland and focuses on some of the issues affecting delivery of EAP in Highland. Its content is relevant to a number of questions in this consultation and reflects the unique rural nature of Highland and the practical difficulties households experience in this area.

5. (b) How should these be addressed?

Local authorities and community councils are able to access remote areas and signpost households to advice and assistance. Specific attention is required to ensure that these households are not missed out and full engagement with local groups/contractors/energy advisors takes place.

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 have shown that an area-based scheme, the Universal Home Insulation Scheme (UHIS), can be successful in targeting areas of high fuel poverty and reaching out to households who normally would not consider or could afford energy works. The challenge is to develop schemes which target external wall insulation and to develop the marketing, support, quality assurance and monitoring required. As part of this there needs to be a continued focus on partnership working to ensure that all stakeholders promote and deliver schemes. Part of this will include information-sharing and ensuring that all relevant sources of data are collated. In this, we would encourage further development of the Energy Saving Trust's database and stakeholder access to it. There have been previous issues with delays in updating this database but potentially it could provide all stakeholders with the most accurate up-to-date information on private sector housing rather than assumptions based on cloned information or historic data. This would then allow analysis alongside the detailed stock information that social landlords have collected to meet the Housing Quality Standard.

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

Funding the necessary works is crucial to ensuring the success of the Programme. In our response to the Energy Efficiency Standard for Social Housing consultation, we have identified the challenges in meeting the current Housing Quality Standard and the financial implications of trying to achieve an enhanced target. We have also identified the issue of Green deal funding for the social sector and how there are no guarantees that utilities will allow for a pro-rata share in Scotland.

The same applies for the private sector and we have no assurance to date that Green Deal funding can work in remote rural areas where the actual costs of works will far exceed similar works in other parts of the UK. We would welcome continued efforts from the Scottish Government to lobby on behalf of the fuel poor in Scotland for a guaranteed pro-rate share of funding.

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

Any simplification of the funding processes and issuing specific regional guidance would be welcomed.

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

There needs to be a promotional approach similar to UHIS which emphasises the local nature of improvement programmes. These programmes need to be inclusive in nature and the message needs to be one of supporting households from initial referral through to post-work monitoring.

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)?

There should be trained advisors available that can maximise the contact with householders in terms of benefits and utility tariff checks. This should be a streamlined process which avoids the bureaucracy that has made EAP difficult to promote to households. Structured interaction between agencies dealing with older and vulnerable households is crucial.

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 x No

11. (b) If so, how would that be enforced?

A decision on enforcement can only be taken once advice has been issued and referrals to financial support have been made. For local authorities to enforce a common standard, sufficient resources must be provided to assist in this process.

12. (a) In box 6 we identify a checklist for maintaining a quality home. Do you agree with our proposed hierarchy of needs?

Yes x No

12. (b) If you think anything is missing or in the wrong place please explain your views.

Detail needs to be given about heating systems in non-gas areas, particularly renewable technology.

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 x No

We support this idea in principle and would appreciate if the Scottish Government made set requirements which would offer local authorities the powers to take appropriate actions. There should however be recognition that owners need to be encouraged to improve their homes as the important first step. Incentivising works rather than formal sanctions would be preferable. Funding streams for households need to be clear and specific guidance produced to target each individual stakeholder group.

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 x No

A minimum Energy Performance Certificate (EPC) standard would have to be reached to ensure consistency. Enforcement would also be considered as a last resort in a structured process. Detailed consideration is required on issues such as:

- Which local authority service is best placed to enforce regulations?
- How will enforcement be funded?
- How will enforcement be targeted (simply poorest performing

properties first?)?
- How will charges be recovered?

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 x 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 x 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 x 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 x No

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

We would refer the matter in the first instance to the legislation held in the Property Factors (Scotland) Act 2011.

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

The profile of an EPC should be raised within a Tenant Information Pack and clear information should be provided as to how much the potential running costs of the home are.
Utilities should also be tasked with providing more information both to

householders and landlords on fuel bills and referring them for appropriate funding.

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

It is only equitable that the private sector should be expected to meet minimum standards as with the social sector. However much more detail is required as to how the issue can become more than a statement of principle.

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

EPCs should contain different recommendations and advice relevant to the ownership of the property. For example, social housing should point out that their landlords must meet minimum standards and that a programme of required works is in place. The EPCs should place additional detail on the proposed measures to highlight this information and support this with details of who to contact for further advice and assistance.

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

The following also needs to be considered:

- Affordability – the standards should not result in an unreasonable cost burden on low income owners and private tenants (particularly when we do not know whether the Green Deal will be technically, functionally or economically feasible to implement successfully).
- Impact on other policy priorities – e.g. desire to create a thriving quality private rented sector; enabling a private rented sector which helps to meet housing needs; housing for older people.

We welcome that consideration will be given to the operation of the Green Deal, the housing market and appropriate Scottish standards.

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

We would advocate an awareness campaign to promote the uptake of incentives.

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?

Ensuring that the hierarchy of improvements are included, i.e. fabric ahead of other measures.

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 x No

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 x No

We believe that fuel poverty has to be tackled in all sectors of the housing stock.

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?

There needs to be recognition of remote and isolated communities where cost will be higher. There should also be consideration of older/disabled people who may spend more time in their home or within certain rooms within their home.

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

Yes x No

Works subject to Building Control and HMO licensing.

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

This is a difficult issue as the first impact can be the best opportunity to undertake improvement. Communication and the provision of support is crucial to assist owners and landlords.

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

Quality must be ensured. The cost of enforcement must be assessed and resourced.

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

Care has to be taken to ensure that sanctions do not depress the housing market further as owners are less willing to sell or rent their property if they have to carry out energy measures as part of the process. Further clarification on this issue and details over sellers' obligations are necessary.

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?

Regulations must be consistent with the timescales the Scottish Government has set in terms of meeting climate change targets. Caution should be exercised as to the speed of the regulation and the need for extensive consultation and communication prior to regulation.

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?

Offer Council Tax reductions for better properties, based on levels of improvement.

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?

Surveyors should be trained to identify renewable technology and income potential. This should be indicated on EPCs.

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?

Greater attention should be made to behavioural changes and encouraging householders to value living in an energy efficient home.

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 x No

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

On-going and accessible support is required.

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

An energy review should be part of the planning process. Renewable technology should be incorporated where feasible into all new build.

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?

Cost and access to reliable, simple to understand information.

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

There should be increased funding per housing unit from the Scottish Government. Further to this there should be more accessible information on different methods of construction and confidence that good design should not have to cost more.

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 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?

No 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 x No

43. (b) If not, What other challenges are there?

[]

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

No 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?

Regional development bodies should be introduced to engage relevant stakeholders in training and information-sharing.

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

Ensure smaller contractors are included in training.

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?

No 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.

Support is needed to assist smaller contractors who often have limited training and travel budgets.

Appendix:

Improving Fuel Poverty Outcomes from the Energy Assistance Package Paper from Highland's Affordable Warmth Partnership Group August 2012

Introduction

This paper from the Affordable Warmth Partnership Group (AWPG) is in response to experiences and issues identified across Highland. It aims to raise awareness of difficulties encountered in relation to Energy Assistance Package (EAP) Stage 4 and proposes possible solutions. The proposals may be relevant to other energy improvement programmes.

The Affordable Warmth Partnership Group involves a range of organisations who want to bring services together to tackle fuel poverty and affordable warmth issues in the Highlands. Members include representatives from The Highland Council, NHS Highland, Energy Saving Scotland advice centre, Lochalsh & Skye Housing Association, Energy Saving Trust and Energy Action Scotland. Chaired by the Highland Council, its key remit is to help take forward the Highland Partners Affordable Warmth Action Plan, part of Highland's Housing Strategy.

We are aware that the Scottish government, with the EAP providers and others, has been making on-going improvements to its fuel poverty related funding packages. We are aware however, that some of these have still to work their way through in practice. It is also our understanding that the EAP Stage 4 contract is under review. Highland organisations have established a new referral process, Healthy Homes for Highland, which aims to increase referrals from vulnerable households e.g. those in contact with care or support providers.

Following on-going discussions at partnership meetings we felt that there was value in discussing the various issues with Scottish Gas and submitting a paper to them and the Scottish Government. This is with the hope that the delivery of EAP, and related assistance, will further improve, the full value of the investment is realised and, crucially, vulnerable people living in cold houses are helped to have warmer, more energy efficient homes.

As part of the process of drawing up this paper, the AWPG had a useful meeting with Scottish Gas to explore the issues and possible solutions.

The Energy Assistance Package (EAP) is a very important and valuable mechanism in Highland. In the last 3 years, 15,400 Highland households have been assisted by EAP. Almost 2,300 of these have been provided with installations via EAP Stage 4. These outcomes are particularly important given our high levels of households in fuel poverty and extreme fuel poverty.

Local organisations are aware that there are some issues regarding the process of delivery EAP Stage 4. Examples of some of the EAP Stage 4 issues encountered include:

- Confusion, poor communication and miscommunication.
- High levels of cancellations and drop-off following referral.
- Excessive delays - the *shortest* completion time for clients in one area was 168 days, nearly twice the Highland average.
- Poor quality of work and apparent poor accountability for quality control.
- Up front work required in advance of measures which some unable to afford.

Issues & Suggestions

Ensure good and comprehensive communication and documentation

It appears that crucial details (e.g. location, house type or the installation requirements) are often not communicated by surveyors to the installers leading to delays, inconvenience and wasted time and money.

Communication between Scottish Gas, surveyors and contractors and the client has been very poor. Examples include: contacts made at short notice; no confirmation letters; and no follow-up in terms of customer support. This gives rise to significant problems when things do not go as planned and a clear paper trail of surveys, recommendations made and works done is not available.

Scottish Gas has introduced new management, accountability processes and it is hoped that improvements will continue to be seen.

Support and encourage local support and advocacy through process

6 out of 10 of households assisted by EAP Stage 4 in Highland were over 75 and a further one in 5 were over 60. It is likely that a high proportion of these households could be deemed vulnerable and struggle when dealing with organisations and bureaucracy. As Stage 4 process e.g. surveys etc. are complex, older / more vulnerable customers find the process difficult. One of the aims of EAP was to provide a one-stop shop and improvements could better achieve this.

It appears that those who have support from a family member, carer or from local intermediaries such as advice services, have had measures delivered more quickly than those who have had to deal with it all on their own. In addition, cancellation is less likely.

We feel that 3rd party contacts are crucial. There should be scope for more than one 3rd party contact so that, for example, organisations providing support with the process are able to assist alongside a family member.

Research has identified that personal, practical, in-home support and advice can be an important factor in success.

We would also suggest that ways to improve links with organisations who can act as intermediaries are identified and encouraged. For example encouraging customers to give 3rd party contacts; actively supporting referrals and advising customers about local support options and encouraged to provide 3rd party contacts. This is particularly important where a customer has been identified as vulnerable and there is no 3rd party contact.

Programme operators should be encouraged to link with local advice agencies where these exist.

Organisations should be encouraged and resourced to support advocacy arrangements e.g. through use of ECO related funding streams.

Reduce cancellations

We are aware that there are a wide range of reasons why projects are cancelled and that customers can appeal their cancellation. We are concerned about the high level of Stage 4 cancellations.

We suggest that notification of cancellations, at the time they happen, is passed to the local ESSac, or other appropriate organisation, who can then attempt to contact the household to review the issue. This could lead to the issue being resolved enabling the necessary work to be undertaken. For example, sourcing funding to undertake any re-wiring upgrades required to support the energy improvement.

We would also welcome an examination of the reasons for cancellations. Well-timed data on cancellation reasons at, for example, local authority level would also enable area based issues to be identified and options to be considered. For example, whether funding from an alternative source such as via the Local Authority's Scheme of Assistance would assist.

Clear explanation to the household about all current options for measures

The full range of EAP measures should be considered in each case and the effectiveness of different options assessed. There should be a greater focus on achieving the most affordable heating regime for an individual house.

It appears that this has not been consistent practice - e.g. limited use of internal insulation in appropriate properties.

Fit for purpose solutions available including:

- **Processes in place for traditionally built homes; non-standard properties and awkward cases**
- **Funding or support to source funding for pre-requisite improvements**

We would suggest that assistance should look in the round at what is needed to create a warm, affordable home. There are some measures currently out with the scope of EAP Stage 4 which are penalising households in rural areas.

Room-in-roof properties, common in the Highlands and Islands, are often unsuitable for loft insulation due to lack of access and/or space. This means that frail and/or elderly people are left with very cold bedrooms, which present a significant risk to their health. We need a solution to help the fuel poor who have rooms in the roof.

Extensions, also extremely common in Highland, require to be insulated through, for example, loft and cavity wall insulation. It does not appear to make sense that; for example, a small attic space can be insulated, whilst an extension that is only marginally under the required percentage cannot be, when fuel and carbon savings can be achieved by doing so.

Some measures, e.g. boilers, should not be installed before areas, such as those mentioned above, being insulated. Without installation of adequate insulation, when new heating is installed a householder's energy usage, and therefore cost and carbon emissions, could increase.

Preparatory and related work (e.g. rewiring or chimney re-lining) required in advance, have prevented some measures being installed as households have been unable to afford to carry out necessary improvements. Given that a higher level of support is made available if initial measures fail to bring the house up to standard, it seems logical that this further assistance should include essential re-wiring, chimney lining, loft clearance etc. At the very least, support should be provided to help the household source funding through for example, referrals to local care and repair providers.

Better Promotion of Official identification

The importance of using clear identification which the customer is encouraged to check, including through phoning the provider or ESSac, should be stressed and customer awareness supported.

Moreover all surveyors or installers should be required to leave a calling card with a named contact and their telephone number.

There are increasing number of contractors targeting households on spec e.g. for insulation work.

Explore Options for Locally Based Contractors

It is suggested that there would be value in reviewing options for supporting and developing the use of more locally based contractors for all or part of the process and improve work scheduling in rural areas. This could help make better use of resources and may provide better value. It appears that the logistical and financial implications of sending numerous surveyors and contractors to remote and rural areas are significant. Moreover use of local tradespeople makes good use of knowledge of the local area and helps to invest in rural economies.

Improve understanding of the customer's experience and outcomes

We are aware that data is published on the Energy Saving Trust website on EAP, there doesn't appear to be research or analysis of EAP outcomes and the effectiveness of the investment. We feel that there would be a value in reviewing the EAP outcomes in order to assess what parts of the package are working well and identify where improvements could be made. This could also inform future energy efficiency investment and assistance programmes.

In addition we would very much welcome more local data on EAP with which we could identify and explore any geo-based anomalies. We are keen to understand for example why there are large numbers of enquires which don't appear to move onto the next stages of EAP.

There appears to be no evaluation undertaken after the EAP process to assess the actual improvement in comfort levels within the house or expenditure on energy bills. We think there would be value in these before and after installations. Suggested improvements to a home are based on a computer programme which doesn't appear to have the flexibility to take account of the circumstances of the householder, other than their age and status as regards receipt of benefits. We are aware from experiences that improvement in these does not necessarily follow from energy efficiency measures being installed.

We would also recommend that there is scope for an independent survey which also assesses the client's satisfaction with the process and outcomes.

Conclusion

The above recommendations are based on experiences in Highlands. In looking at what might be included in the EAP contract in 2013, we hope that future schemes have improved customer care processes which better recognise the issues vulnerable people face, can respond to non-standard referrals, and which result in affordable improvements to the comfort levels within a house.

Contact

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