

**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 checked="" 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 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

We believe that the objectives reflect the national priorities of tackling 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?

A cultural reluctance of home owners to maintain property other than reactively is the main barrier to long-term property maintenance investment and in particular investment in energy efficiency measures. The ability to progress communal measures is also a considerable barrier.

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

The development of a comprehensive information resource delivered through our Scheme of Assistance is aimed at engendering a culture shift towards preventative maintenance measures and in conjunction with this we operate an area based scheme which promotes energy efficiency measures delivered by a reputable provider. We believe that the use of Local Authority branding offers a 'trusted brand' and encourages participation.

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

The security of financial return from significant financial outlay is an important consideration of households considering the installation of energy efficiency measures. As noted in response No. 3, we believe that the use of Local Authority branding offers a 'trusted brand' and encourages participation.

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

5. (b) How should these be addressed?

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?

The proposed funding model 1.35b would provide the maximum funding available and local authorities would be able to source funding based on local priorities and distribute this through existing successful area based initiatives. It would also allow the national Government to have more control over the activities of the energy companies, limiting instances of mis-selling and the cherry picking of customers and easy-to-treat properties.

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

The Scottish Government should play the roles of setting the strategic framework and facilitating national funding schemes. Thereby ensuring that the work of Local Authorities fits with the overarching fuel poverty and national carbon reduction aims and maximising available funding streams into one large 'enabling fund.' There is also a role for the Scottish Government in evaluation of local delivery schemes and promoting good practice based on successful delivery models.

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

Without knowing what the additional powers would be it is difficult to respond in full to this question. However, allowing Local Authorities to set local priorities and providing additional financial incentives to home owners could ensure the installation of retrofit measures.

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

There are 3 key elements to delivering the scale of change required;

- Co-ordinated and consistent information and advice from trusted sources
- The provision of adequate financial assistance
- Penalties for those who do not comply in instances where a reasonable opportunity has been afforded

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)?

Establishing a clear and consistent message with clear routes of referral which links as many voluntary and statutory organisations as possible will increase awareness and maximise the benefit to all consumers. Delivery through trusted sources will also contribute to maximum participation.

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?

This could be an amendment to the existing thermal insulation element of the Tolerable Standard. However, additional financial burdens on home owners during times of economic recession would not be advantageous within the overall housing market and it is suggested that it would be prudent to introduce and enforce a new standards at point of sale through the EPC and Home Report route.

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.

Point 3 should be strengthened to reinforce the role of retrofit in delivering the visions and objectives set out in the strategy.

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

A minimum standard for thermal insulation already exists and this could be enhanced within a policy based on tackling the linked issues of poor thermal efficiency-high fuel bills-low temperatures-ill health.

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

There should be no additional burden on Local Authorities to enforce the decision of owners under the title deeds or tenement management scheme as there are existing legal procedures which the owners can progress themselves. Where existing schemes are utilised, e.g. missing shares, work notices, etc. it is essential that Local Authorities have appropriate powers to recover the costs associated with enforcement. A simplified process for attaching burdens to title would assist recovery of finances.

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

Local Authorities should have this option available as a tool to improve energy efficiency.

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

Any streamlining of the current maintenance order process would be welcome, so long as it is combined with powers to recover the costs associated with taking enforcement action.

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

This change in process would improve the system for issuing work notices.

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?

As noted across previous responses, the provision of independent, trusted advice is key to raising awareness and importance.

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

Yes, an amendment to the Tolerable Standard would be a way of doing this. It is important that the largest housing sector in Scotland is not omitted from improvements in energy efficiency, with the focus remaining on the relatively small social sector.

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

The tenure of a property should not be a factor in the physical conditions in which people live.

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?

It is recognised that people with particular illnesses require greater levels of energy consumption to obtain levels of comfort and it would be laudible of the Scottish Government to pressure energy companies to establish a

separate tariff which allows people with serious and/or terminal illnesses to heat their homes to appropriate standards.

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  No

A phased approach could set a short-term timescale which could be complied with at point of sale (see response to Qu. 11). A further long-term date could be set by which time owners will have received appropriate advice and information enabling them sufficient opportunity for retrofit installation.

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

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