

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

Generally we feel that the overall vision and objectives of the Governments aims are fundamentally correct; however, the

The statement that no-one in Scotland has to live in fuel poverty as far as is practicable by 2016 will be extremely challenging to achieve.

Evidence has shown that energy costs have risen significantly over the past 10 – 15 years in comparison to income levels. Estimates show that the costs of energy are likely to continue rising for the foreseeable future which equates to a constantly moving target between income and expenditure.

The volume of properties requiring upgrades or energy improvements is potentially massive and it is unclear whether there are sufficient resources to achieve the task in hand given the significant redundancies that have been made in the construction sector over the past few years.

It has also been demonstrated that fuel poverty can apply to all classes in society, both middle income and the poor. The process to bring society out of fuel poverty needs a combination of both technical solutions, in terms of insulation and draft proofing, but also includes additional financial support for people on very low income streams.

It has been demonstrated that people on very low incomes, even though living in reasonable high, energy efficient homes (band B or C) can still be in fuel poverty given that there is still a requirement to pay utility bills which could still account for 10% of a residents income.

In addition, it must be acknowledged that fuel costs are increasing at a much higher rate than incomes and therefore the objective of getting the majority of people out of fuel poverty in properties that still incur some level of payment for utilities (heating and lighting) will be very difficult to achieve given the constantly moving targets.

From a practical point of view, the proposal to increase the energy efficiency of the existing housing stock to a level such that they require very little energy to heat is very challenging, both from a technical point of view but also in practice.

It may be more practical to tackle the problem of fuel poverty via a new build programme, thereby, offering the opportunity to build zero carbon homes that are totally self sufficient in terms of heating, lighting and power.

Enable the refurbishment and house building sectors to contribute and benefit from Scotlands low carbon economy; This is very much dependent on the availability of funding streams and finance availability for both the public and private sectors and more so, a willingness for individual owners to carry out the necessary works to improve the energy efficiency levels of their homes.

Most funding streams being proposed appear to be moving towards a low

interest rate loan, and away from the grant process.

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

One of the biggest problems facing landlords in improving energy efficiency of their housing stock is principally the lack of finance, but other barriers exist such as:

1. The carrying out large scale refurbishments whilst the property is occupied
2. The ability of technical solutions, especially renewable energy to provide an adequate solution to improve the energy efficiency of a property, especially beyond 2020.
3. The opportunity to carry out extensive energy improvement works whilst the property is occupied.
4. The complexity of obtaining the consent from adjoining neighbours in order to carry out communal upgrades of the building.
5. Gaining access to common roof areas where access is via a top floor flat.
6. Insulation of lofts – many lofts are used as supplementary storage rooms and full of domestic item that will need removed prior to any works being done.
7. Planning constraints especially in relation to listed buildings or properties within conservation zones.
8. Resistance to the Potential acceleration of components not at the end of their life cycle but necessary due to large scale renewable or refurbishment contracts.

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

Taking each of the points noted above in numerical order solutions may range from:

1. Financial incentives to tenants having to be decanted from their home whilst the improvement works are carried out. The provision of suitable decant accommodation which currently is very limited within an RSL or local authorities existing stock.
2. Primarily based on the development of renewable technology and how this advances over the forthcoming 8 – 10 years.
3. The difficulty in carrying out large scale refurbishments whilst tenants are in residence could be overcome by incorporating energy improvements part of a larger scale contract where tenants may need to be decanted. Alternatively, advancement in technology may provide solutions without the need for decant.
4. Owner consents are always difficult when the work is not essential or a legal requirement. Disturbance to a neighbour or inability to provide finance can essentially stop a contract. The

advent of the green deal will hopefully address these problems, providing finance for owners to make investment in energy efficiency with no capital outlay. However, the problem of inconvenience or disturbance still exists.

5. Similar to item 4 above where an owners permission may be required. Persuasion or enforcement, may in some cases be the only solution to some of these problems.
6. One solution is to offer removal of these items as part of the insulation works. We are aware of some councils offering a loft clearance service and it appears to have been quite successful in achieving completion of the insulation works.
7. Planning constraints need to be relaxed whilst being mindful of the aesthetic and conservation impact with works being carried out without due consideration for the character of the building or its surroundings.
8. The lifecycle of many components is the mechanism to which may RSL's and Local Authorities develop budgets and works plans for the future. Replacing elements before their official replacement can have a serious impact on budgets and forward planning. Any improvements with regards to energy efficiency must carefully consider its impact on other elements that may need replacing as part of the contract.

a)

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

Given the myriad of technical solutions on offer, companies offering various insulation measures and energy improvements, confusion and misinformation regarding FiT and RHI income streams and different funding mechanisms, there is a certain requirement for a single entity such as the Energy Savings Trust to offer impartial, independent advice so that home owners and Landlords are able to make an informed decision regarding their options. If this is not the case, there are too many opportunist companies to feed off the back of the scale of the task in hand.

Further, the government backed schemes such as run by EAGA or the central heating for the elderly were very worthwhile schemes, targeting advice and technical solutions to where they were needed.

Advertising and public awareness needs to be co-ordinated by a single body such as the BRE or EST and on a scale similar to that of the digital switchover process.

In addition, and following the installation of renewable energy solutions, occupants require training and knowledge of how to use the new system and how the new technology works. There is currently a significant lack of public knowledge as to how renewable technologies work and what they are designed to do.

Performance levels of renewable technologies together with true and factual performance information needs to be collated and made available to the public but in a format easy to read and understand. For example, the performance of solar PV is dependent on size of panel (watts), performance of panel (% loss) performance of inverter (% loss) solar irradiance levels

dependent on geographic location within the UK, and orientation of the roof. It is very difficult for members of the general public to make an informed decision based on these various factors, and therefore the public are very much dependent on advice given to them by installers which, by nature, may not be as impartial as it should be.

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

We are unable to provide significant experience or advice in this area due to the general location of Links portfolio, however, common sense would state the following problems would be encountered with more remote properties:

- a) Geographic location and difficulties in getting materials and resources to the individual remote sites.
- b) Capital unit costs will be higher due to access and resource difficulties. It is likely contractors overheads will be higher carrying out works on islands etc. Due to accommodation requirements, additional transportation costs, and difficulties with material deliveries.

5. (b) How should these be addressed?

Principally, the issue would be a financial implication over and above the normal costs associated with works on the mainland. To resolve these issues, it may be prudent to offer an additional finance package dependent on geographic location in order to bring costs in line with base line cost. However, it may be found that if island works are tendered as part of a much larger package of works, economies of scale may be achieved..

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?

We feel that the local authority may have a significant role in the step change in retrofitting Scotland's housing.

The Local Authority, given their involvement in day to day activities for all households in Scotland through council tax, refuse collection, planning etc. are uniquely placed to provide encouragement, best practice and general advice to Scottish households who wish to carry out energy improvements. They also have the ability to issue information leaflets as part of other communications (Council Tax) presented to individual households as well as using the infrastructure of public libraries around the country to offer guidance and information.

The current Government proposals indicate that funding may be subdivided between local authorities to manage and as part of this process, it makes sense that other associated services sit alongside the funding management as a one-stop shop.

We would however note that more detailed technical knowledge may be better placed with other independent organisations who have a better understanding or technologies and construction to offer this advice to individual occupants.

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

It is our view that the Scottish Government should have the over-arching control of the national retrofit programme but with specific responsibility for planning issues and appeals, legislation and enforcement relating to non-conformity by property owners.

The Government should also be responsible for all advertising, whether this is through Television, local press or radio, or any other medium associated with energy efficiency and the energy performance of buildings given the process is being primarily driven by them.

In order to ensure a strong message is being delivered to the public, the process of advertising needs to be extensive and encompass a strong message that this is not optional but mandatory to safeguard the resources we have left coupled with the environmental impact of climate change.

We would again draw your attention to the Government backed schemes such as the EAGA heating for the Elderly which was used to target a specific group of consumers.

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

The more parties, and the associated powers those parties have may be of significant benefit in terms of resource allocation. It may also be of benefit where financial powers are allocated to Local Authorities or other senior advisory bodies. However, where more parties and organisations are involved in the process, the greater the danger of mixed messages, policies and guidance becoming. This is evident from the current CERT funding process controlled by individual energy companies, where each company has different requirements regarding the percentages of priority and super priority groups. This ultimately leads to confusion and conflict between the funders and those being funded.

We would conclude that it is therefore essential that one over-arching company ensures the full project management of the process using partner type organisations to supplement and enforce specific tasks within the process ensuring that a single, clear message is communicated to the public and contractors to ensure everyone knows what the final goal is, and how they are to achieve it.

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

This can be summed up in about 5 independent paragraphs ;

Significant funding at zero interest rates.

Advertising to make people aware of the reasons the programme is being implemented.

Resources to ensure the works are carried out, and to a high standard.

Incentivise the public to ensure everybody carries out the minimum

requirements.

Assistance and help with vulnerable / elderly / disabled groups in society.

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)?

High risk groups need to be either identified using existing systems / data or requested to make themselves known in order that a tailored assistance package can be employed for these groups

The main aim being that no one is excluded from the works either by age, race or disability, and the best way to achieve this is to use existing communication channels to both promote and activate the programme. Once specific groups have been identified, a full energy assessment needs to be carried out on their home. This should establish their existing circumstances, not only financial but also technical; how much insulation and what type they have, what type of boiler they have, efficiency of heating system and how energy efficient their current home is utilising existing utility bills and energy measurements such as SAP or NHER.

Other methods that may be used by Landlords to supplement the above would be House Condition Survey data, homereport databases, and existing and historical works records via a maintenance and repairs programme.

Once current circumstances have been identified, a tailored package of energy improvements measures should be recommended to the customer, but this again should not only be a technical solution but also encompass general energy advice on any new technologies fitted. together with evidence of the cost benefits to the customer following improvements. This final point is probably the most significant, yet, most difficult to determine prior to the installation of any new energy efficiency measures. People can physically see what they are currently paying in terms of energy (gas / electric) but it is very difficult to categorically advise someone that if they change to a new heating system (for example) their energy bills will reduce by a certain percentage because energy use is determined by so many variable factors such as weather conditions, internal house temperatures, family profile etc. Therefore, carrying out certain measures may not guarantee a reduction in energy cost but one way to assist with this would be the combined installation of an energy monitor to give a visual view of running costs in real time. This could then be compared to a benchmark set before measures were introduced.

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?

It is a well known fact that the general condition of a property will have a

general correlation to the energy efficiency levels of that same property. The tolerable standard is a minimum standard to ensure the public health, comfort and safety of the occupants; However, there is no specific reference to insulation standards or heating systems.

If the Scottish Government wish to upgrade all properties within Scotland to a minimum energy efficiency standard, the only way to achieve this is to ensure the tolerable standard applied to private properties is to significantly increased or make specific reference to both heating and insulation levels.

This however needs to be tied in with the general maintenance levels of the property to ensure that any insulation improvements are not compromised by water ingress or significant air permeability of the building fabric.

Enforcement of the tolerable standard is currently controlled by the Local Authority, and it makes sense that any further improvements to this standard are again controlled by the authority applicable to the area the property is located. I see no significant benefit that enforcement of this is dealt with by a secondary party, although there may be benefits with regard to consistency of approach, thermal analysis and resourcing where energy efficiency levels are being improved.

Other mechanisms could include recovering money from the sale of a property or enforcing the purchaser of a property to bring it up to a certain SAP or energy efficiency rating rating.

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.

All six points appear to be relevant to the facts necessary to maintain a home, however, It may be worth adding that where replacements are being considered (such as windows, doors etc) the most energy efficient replacements should be considered; furthermore, financial subsidies could be considered when people wish to purchase highly energy efficient products such as triple glazed windows which are inherently more expensive that double glazed.

No mention of draft proofing or air tightness is mentioned within the checklist. It is again well documented that heat loss from a building will be significantly higher where a high proportion of air changes due to drafts and air leakage is being experienced. A reduction in drafts needs to be tackled to improve heating efficiency, but care should be taken in that significantly reducing drafts could be counterproductive in terms of increasing the risk of condensation, mould growth and the general internal air quality. A building will still require to achieve the appropriate number of air changes in order to prevent poor air quality and the consideration of mechanical ventilation will need to be considered when looking at air-tightness.

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

In order to achieve the objectives of the Governments Policy on Energy Efficiency, the local authority should be able to enforce a statutory notice on an owner of a poorly insulated, energy inefficient home. However, in doing this, a number of very important factors should be taken into account:

- a) The Financial ability of the owner to pay for improvement works.
- b) The type and location of the property; i.e., is the building listed or within a conservation zone that may preclude certain energy efficiency measures being employed.
- c) Certainty regarding the current energy assessment of the building and the practicalities and costs involved in improving those levels.
- d) Reasons why the property is inefficient and what the possible solutions are regarding improving the energy ratings, i.e.: can the walls be insulated, can the roof be insulated?

Once the above points have been established, a decision should be made as to whether the property can be physically improved and the owner has not done the improvement works, or the property can't be improved and therefore some form of exemption should be applied.

It must be noted that it may be likely that due to ornate or historical details in some older properties, it may not be possible to improve insulation levels to some elements within a building without causing significant or irreplaceable damage.

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

This is unlikely to be enforceable as title deeds normally only account for repair works to maintain the fabric of the building and not to enforce or require people to carry out improvements.

It however does make sense that owners are forced to become part of a

larger project affecting their property which has been agreed by a majority of their neighbours or is a requirement under statutory legislation. In addition, where energy efficiency measures will affect the whole building, including common parts, which by default, will be to the benefit of all occupants, then all occupants of that building should be responsible for paying a contribution of the costs. Heat loss from a building will affect all the occupants and energy efficiency improvements should therefore be the responsibility of all residents, and not just individuals who are willing to pay.

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

Unable to provide comments – lack of knowledge in this area

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

Unable to provide comments – lack of knowledge in this area

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

Unable to provide comments – lack of knowledge in this area

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

Unable to provide comments – lack of knowledge in this area

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

Unable to provide comments – lack of knowledge in this area

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

The key in raising the importance of energy efficiency must be principally driven by education to demonstrate the benefits to both owners and tenants of living in a well insulated, warm and cosy property that costs very little to run.

It should be recognised that properties that are very energy efficient should command a higher rental income, given the energy costs for the property will be much lower than a traditional home. Therefore, In terms of future capital value, properties of a higher energy rating should be more expensive than less well insulated properties.

Other mechanisms that could be considered of raising the importance of an energy efficient home would be to incentivise people for either living or owning a highly efficient home; this could be either by way of council tax reduction or pence per unit reduction in energy costs (gas and Electric) based on the energy performance certificate for the individual property.

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

Yes. All domestic properties should have to achieve a minimum energy standard.

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

There are a number of improvements that could be made to the current format of the EPC. The existing certificate only provides an overall energy rating for the property, and does not break this down into say the following sub-groups, all of which combined to provide the overall rating:

- a) Heating
- b) Hot Water
- c) Electricity Consumption
- d) Gas Consumption
- e) Insulation

Having the data broken down into sub-elements, it should make it easier to target specific improvements and demonstrate to occupants that if you spend £x on improving the energy efficiency of certain elements, then will achieve a probable saving of £y and a payback in z years.

However, one area that is not taken into account and can have a significant effect on the energy efficiency of a property is drafts and air changes (air tightness). This single element can increase the heat loss from a dwelling by as much as 43%.

Testing of this element should be considered, but to do this in an occupied property may be difficult to achieve. Ventilation losses could then also be

factored into a physical cost and applied to paragraph 2 above.

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

The introduction of any regulations should meet a set of criteria;

- a) Are they stringent enough?
- b) Are they achievable
- c) Are they enforceable?
- d) Can they, or are they measurable?
- e) Who will enforce them?
- f) What are the consequences of non-compliance?
- g) Do they cover all aspects of what we are trying to achieve?

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

In our view, there needs to be a direct link between regulation and the form of incentive, whether this be grant or loan finance or advisory services. The difficulty would come where regulation tends to be implemented for a period of years where incentives tend to be shorter term measures, generally reviewed annually.

The statement regarding homeowners only do the works where incentives are being offered would be difficult to administer, given that each property needs to be assessed on an individual basis and will require differing energy efficiency solutions depending on location, orientation, size, build type etc.

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?

We would generally agree that the 4 options detailed are generally correct in terms of improving the energy efficiency of the housing stock. We would however require further details on each of the standards to make a fully informed decision; However, we would provide comments on the following:

Measures based approach:

Difficult to assess:

Some properties don't have lofts , Not all cavity walls can be insulated, Greatest problem with this approach is that it will not improve the majority of properties in Scotland bringing them up to a minimum energy efficiency standard from the basis that there are so many properties that would be excluded from the measures based approach philosophy.

Standards based on achieving a certain EPC score:

We feel that this option is probably the most beneficial way of tackling all of Scotland's housing stock. There should be no exceptions and because a

combination of different measures could be used, then all the housing stock should be able to achieve these levels.

However, the appropriate funding would need to supplement specific types of properties and the differing energy measures that may need to be employed.

We would however always advise that a “Fabric First” approach should be adopted, ensuring, where, as far as possible, insulation levels and draft reduction are maximised. **Carry out Energy measures recommended by the Energy Report:**

In theory, this is a good idea; However, in practice the proposals and solutions will be very difficult to achieve, and again will not tackle the majority of Scotland’s Housing stock due to the current requirements regarding the production of an energy report.

Energy reports, by their nature focus on the energy performance of the property and do not consider location, listing, age or build type. Therefore, many possible recommendations made in the report may be impractical to achieve due to Planning restrictions, Listed Building status, build type or configuration etc.

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

We think this is a fair and reasonable approach, especially when looking at retro-fit solutions.

Meeting the energy efficiency requirements identified for 2020 should, using existing energy efficiency measures such as cavity and loft insulation, double glazing and central heating should be generally achievable.

However, moving towards 2050 and the energy efficiency levels proposed for this date will be much more challenging, and although technologies will change, how much they will change will be much more difficult to predict.

The only way currently to meet the proposed energy efficiency standards for 2050 is to utilise renewable solutions to supplement existing more traditional measures as detailed above. However, because some buildings, especially flatted developments will have limitations on roof areas for solar pv, solar thermal, or limited external space for ground or air source heat units, it is likely that some properties may never achieve the recommended standards.

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

Irrespective of financial ability to carry out energy efficiency improvements between the private ownership sector and social rented, the overarching goal of the energy efficiency standard as we understand is to reduce carbon production and a corresponding reduction in energy consumption.

There is an argument that homeowners should have higher energy targets than the social rented sector given the likelihood of finance availability; however, this is not always the case and you could not make the assumption that if you own your own property, you are financially able to carry out energy improvements.

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?

The only comments we would make in this regard would be that older people or people with disabilities who have limited mobility generally require slightly higher comfort levels. Again, there is a possible argument that a higher insulation standard should be adopted for specific elderly accommodation such as care homes or supported accommodation for people with disabilities. However, and as noted previously, there is not necessarily a direct correlation between limited financial capacity and the elderly or people with disabilities. If energy improvements are carried out to a sufficiently high standard, then most people should be taken out of fuel poverty bracket which is one of the key aims of the regulations. However, in order for this to work, there should be additional funding to help landlords achieve this.

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

Yes No

The difficulty with trigger points is the targeting of all the housing stock to which the standard applies. If a trigger point is used as the only means of ensuring a property is brought up to a minimum standard, then this is only going to apply to a very small percentage of the housing stock within Scotland.

However, one option may be to use a trigger point as a secondary check on a property to ensure it meets the required standards of energy efficiency. If, a property fails this check, then a mechanism could be in place to ensure the purchaser of the property carries out the necessary improvements to bring it up to the required standard.

Where a property is being rented, the Landlord should be responsible for bringing the property up to a required standard before the property is allowed to be re-marketed.

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

Given the timescales for carrying out energy efficiency measures, a phased approach would further delay any requirements to improve the energy efficiency of the housing stock.

Examining the proposals for a phased approach, I feel that there are a number of problems with each of the options; Namely:

By Energy Efficiency Ratings: This method would only work where all the stock has an energy efficiency rating. Only properties that have been rented or sold within the last few years will have this detail. This proposal would require all stock to be surveyed and given an energy certificate. There is neither the time nor resources available to achieve this task.

By Location: Many large Scottish Landlords, especially RSL's and Local Authorities have housing stock spread throughout a large geographic area. In terms of energy efficiency programmes, there is a significant benefit to let contracts on a multiyear or term basis to gain the advantage of bulk procurement and economy of scale. In addition, many RSL's and landlords will understand the significant problems of not gaining access to properties due to uncooperative tenants. Having a policy targeting specific geographic areas, may, in effect, financially punish Landlords who may have to carry out retrospective energy efficiency measures at a later date without any funding assistance due to no fault of their own.

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

Although Link have not been the subject of enforcement action, we can only provide comment on our own personal assumption of what may need to be considered:

Where homeowners or landlords either refuse or have not carried out energy efficiency measures, then these need to be checked and a level of enforcement applied to the defaulting landlord or home owner.

With regard to checking and enforcement, a number of issues need to be considered:

How the problem can be corrected:

This could either be by fine on the homeowner, increase in council tax until the works are carried out, enforcement action in getting a company to carry out the necessary measures although this may lead to legality issues surrounding ownership of the property or problems gaining access.

Quality of the works and materials employed.

It may be that the works have been carried out to a minimum standard, but the quality of workmanship and quality of materials are sub standard. All materials used should be approved and easily recognisable for checking.

Scope of Works:

What and how are the measures checked. For example, how is a cavity wall checked for the presence of insulation? How is a loft checked and to what extent? How are renewable energy systems checked such as PV or solar thermal? It may be located on the roof but is it working and how efficient is it

working?

To check some measures, access into the property will be necessary. Who and how will this be done ?

Resources: How many resources will be required, not only in manpower but hardware such as vehicles, thermal imaging cameras etc?

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

Failure to carry out energy efficiency measures by homeowners or the PRS must be enforceable by some means if the Scottish Government are to meet their targets.

It makes sense that the sanction is passed on to the purchaser of a new home, given, they are likely to be living in that property for a significant period of time and will recoup the benefit of the energy efficiency levels of the property.

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?

There is no doubt that in order to upgrade the housing stock in Scotland to a set level is a massive undertaking and resources need to be in place for this to be achieved.

The resources are both labour driven and material /supply driven and both these need to be in place to ensure the works are both carried out and checked / enforced.

The timing of 2015 (2 years) for initial implementation of the policy, when compared to the similar task of the digital switchover is an extremely tight timescale but if resources are organised, this should be achievable.

34. (a) In Section 3.11- 3.13 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?

In terms of energy efficiency, beyond the environmental benefits, the identifiable benefit is financial. However, without the assistance of the law to enforce the requirement, people will generally accept the current situation and be unwilling to change.

Once people engage with the realisation of how much money they can actually save on annual energy bills, people may start to change and adopt a new lifestyle.

I would note that the "Home Energy Score" (similar to EPC) which is used in America compares the home being assessed with other homes of a similar size and build type in the surrounding streets, thereby encouraging "environmental competition" between neighbours in similar neighbourhoods.

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?

As shown above, it is very difficult to establish actual savings on someone's energy bill by carrying out energy efficiency measures because of the different and constantly changing variable.

With regard to income generation from renewable technologies, this should be fairly easy to establish by looking at the commissioning sheets for the applicable technology, commissioning / installation date, FiT or RHI income through historic generation data (note that the FiT income may not go to the home owner but go instead to a third party, forward forecast as to the income generation remaining (up to year 25) and any associated cost reductions to the energy bills as a result of the installations (quite difficult to quantify)

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?

Physical benefit to a home owner.

Lack of information generally on renewable technology.

Lack of hard factual and proven financial data demonstrating actual savings against other fuels. This based on a variety of house types, ages or property and build type.

Lack of maintenance data for renewable technologies.

The different technologies available to the public and what they do.

Lack of user education on how to use and get the benefit from new technologies

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?

Principally education of consumers as to the benefits of low carbon homes. There is currently little understanding of the benefit to living in very energy efficient housing, both from a financial perspective and a health benefit.

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

Environmentally and energy efficient housing is part of the key to developing sustainable neighbourhoods along with consideration of transportation networks, shopping areas and employment zones. On a more localised basis, new housing developments need social and interactive areas, not only for children but adults. Housing zones should also consider recycling opportunities and garden areas where the community have an opportunity to grow their own food, fruit trees and vegetables. The Swiss use a system called Minergie Eco which has been developed for refurbishment of existing buildings and the construction of new build but uses several key factors, Comfort, Health, Energy Efficiency and Building Materials. Within each of these main headings there are several design considerations such as air quality, recycling, temperature and comfort levels, light levels. All these factors whether used in refurbishment or new build will help improve the sustainable nature of housing developments being constructed today and the complete life cycle of the house must be taken into account from inception to demolition. Other elements relate to transportation, pedestrian flow and access to main public hubs such as city centres, businesses or supermarkets.

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?

We would generally agree with the challenges identified but would however question why innovation and research needs to be carried out at such significant levels when systems already exist in Germany and Switzerland who both have similar climates to ourselves. Training, development and the adoption of system builds from our European neighbours should be able to achieve the targets laid out by the government, especially in the case of new build.

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

See above: The technology already exists and has been developed by our European neighbours. Scotland has the skills and expertise to modify and improve something that already exists in Europe and has been used for

several years which is proven and sustainable.

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?

It has been proven that although there are financial incentives for Councils and RSLs to build higher efficiency homes under the AHSP, the subsidy being offered does not meet the cost of incorporating technologies to achieve the higher standard.. If the Government wishes RSLs and Councils to champion greener homes, then incentives that at least match the costs of achieving the higher standard must be made available.

There also appears to be a significant bias towards renewable energy solutions and "Greener Technologies" where in principal, a zero carbon home can be constructed with the need for only minimal renewable technologies. In essence, a zero carbon home is an airtight, highly insulated box fitted with mechanical ventilation.

The further statement of varying subsidy standards up to 2013 should be extended to cover the Building Regulations up to 2016 or the construction of code 6 dwellings.

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

House builders and developers, like the economy are directly influenced by the law of supply and demand. If RSL's, Local Authorities or owner occupiers wish to aquire energy efficient homes, then house builders will provide them.

Most innovation within the construction sector is driven by speed of construction or the limited availability of skilled labour, off-site production having this benefit along with other opportunities for recycling, improving efficiencies and continuity and quality improvements.

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?

The majority of the challenges can be focussed in several key areas;

- a) Technology.
- b) New Build
- c) Retro-fit.

A significant challenge to be addressed is the identification of the correct solution for a particular property type especially with regards the retro-fit market.

Older build types are, by their nature difficult to improve without significant alterations and improvements due to them being draughty, poorly insulated, fitted with single glazed windows (sliding sash)

and possible have roof structures that are difficult to access to insulate. Specialist knowledge is required to treat these types of property, where incorrectly installed measures can result in interstitial condensation, dampness, mould and rot. Technology is another area where specialist knowledge is required, and because this changes at a rapid rate, regular training will be necessary to keep staff fully informed of new technologies and further, how to correctly install and commission these new systems. Bad press in recent years has left many people sceptical of renewable technologies.

New build is an area that is probably easier to tackle, and because new build properties are well insulated, with a move towards system build, training tends to be more standardised and easier to control.

a)

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

In order to achieve the goals and aspirations of the Scottish Government, new and existing resources need to be trained to both advise on, and install new energy efficiency measures.

One major consideration is the availability of training courses throughout the Scottish area. Private organisations need to provide funding for specific courses to ensure the appropriate training staff are available and suitable qualified to provide the correct training, and the Government need to be providing finance to allow colleges to develop the necessary courses.

Training in new technologies and materials should be incorporated into the syllabus of all apprenticeships to ensure all trades personnel have a basic grounding. Thereafter, more specific training should be incorporated in the professional qualifications for gas fitters or electricians.

Investment in training is generally seen as good practice and allows organisations to further develop their knowledge base and experience in certain specific fields.

The use of community benefit clauses in the procurement process for public bodies (this includes RSLs) has become more wide spread in recent years, but there is still a great many organisations not fully exploiting this opportunity. By ensuring that contractors take on work placements and apprenticeships as a condition of winning a public sector contract, the private sector will increase the numbers of training places available as a matter of course. Link's community benefit approach is based on the industry benchmarks developed by Construction Skills Scotland and this relationship has worked well. At present there is no specific benchmark for work that involves energy efficiency, but this could be easily developed. If organisations are supported through this process i.e. through the procurement process to evaluation, then the numbers of training placements in this area could be increased significantly.

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?

This is difficult and although there are specific organisations that are directly involved in apprentice training within the construction industry such as the CITB, the best way to make contractors and developers aware of funding and support opportunities is by way of direct advertising and communication between the training providers and employers.

Funding by the Government also needs to be highlighted, both to employers and members of the public who may be considering a career in the industry. Advertising may be done through national press advertising, direct contact and roadshows and schools and public events.

Corporate events for the construction industry may also provide a suitable platform for training providers to offer assistance to employers and advise what they have to offer.

Homes for Scotland may also offer valuable advertising and act as an intermediary between the training providers and the construction industry.

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

Using CBiP principles -

Recruitment opportunities exist in various forms but several methods that could be considered are:

- a) Specific targeting of localised geographic areas or zones.
- b) Targeting of social deprivation areas where high percentages are unemployed.
- c) Targeting schools, with a view to identifying the less represented classes in the construction sector such as females and the disabled. There is no reason why disabled personnel can't be employed in an office environment as appose to a site based environment. Significant numbers of back office staff will be required by many companies to coordinate, manage and ensure works are done on time and within specific constraints.
- d) Offer organisations additional assistance packages for recruitment of the less well represented classes such as disabled / female.
- e) Ensure organisations can cater for minority classes, both at site level and within office environments.

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?

See comments above.

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.

Link does not operate within the Island communities, and can therefore only offer our views based on a general perception of the possible problems that may be encountered in these remote communities.

Potential employment opportunities for people living in remote island communities are more difficult to obtain when compared with people living on the mainland.

Some of the more prominent difficulties that will be experienced can be summarised below:

- a) Lack of employers in the local communities.
- b) Lack of access to training facilities.
- c) Difficulties in getting transport, and the time it would take to get to further afield sites or developments.

Possible solutions to these problems, together with other options that may help promote training, recruitment / employment problems can be summarised below:

- a) Provision of Roadshows / demonstrations by potential employers who may be considering employment of local labour.
- b) Provide access to training facilities for practical training, or access to IT facilities to supplement distance learning or theoretical training programmes.
- c) Government offer subsidised grants / funding to allow for the purchase of IT equipment for distance learning courses.
- d) Update / ensure broadband access is suitable to all to allow for potential video conferencing.