

**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"/>
<b>Registered Social Landlord</b>	<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

### Comments

A step change is the preferred mechanism however it will have to have a longer lead in than proposed to reflect the RSL's long term requirement to meet funding from own rental incomes. Expenditure on energy efficiency can only be a small fraction of spend as need to continue to provide and maintain in good and useable condition kitchens, bathrooms, doors, roofs to all properties.

Fuel pricing has a huge input to level of fuel poverty / tariffs selected by households are outwith the control of RSL's and many are known to pay premiums to have card meters.

The ideology that the refurbishment to meet increased energy targets will drive future economic prosperity however giving control of grants to profit making contractors has not delivered this to date. RSL's need funding to invest in reputable Contractors, selected through approval mechanisms, to get necessary control and ensure that reliable job completed.

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

### Comments

#### Barriers

#### Funding

- A difficulty for RSL's to access funding
- Hugely resource intensive for RSL to put a scheme together and then often does not achieve funding that set out to.
- Funding streams changing track before RSL's have time to aggregate schemes and apply

RSL stock can be scattered – unable to access postcode funding as schemes too small.

Householders, tenants and adjoining owner occupiers may not wish to co-operate with the works – non essential, cannot force them. For example Manor has 8 households that do not want central heating of any form.

Home owners do not have cash to invest - recession

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

Comments

Mechanism to fund RSL direct to undertake top up loft insulation, external or internal wall insulation.

Mechanism to fund RSL for adjoining owner occupiers – so can undertake works without the RSL carrying the debt risk.

Council tax rebate if measures “appropriate” to your house build type have been installed.

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

Comments

Funding direct to RSL is essential.

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

Comments

5. (b) How should these be addressed?

Comments

6. Taking into account the models and funding sources outlined in section 1.20-1.37, what role might local authorities and other agencies play in bringing about a step change in retrofitting Scotland’s housing?

Comments

Local Authority need to agree to common funding strategy for all properties regardless of

- number held in each local authority area and
- whether rural or urban situations.

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

Comments

Outline the standard which should be goal for all sectors / tenures.

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

Comments

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

Comments

Need to find a funding measure that suits all tenures.

In its proposed format RSL's would be unfairly disadvantaged taking on the burden of Green Deal for tenants. We foresee huge issues anticipated around change in tenancy and expecting new tenant to take on the Green Deal debt charge.

10. How can we make sure a National Retrofit Programme maximises benefits to all consumers (for example, older people, those from ethnic minorities, those with long term illness or disability)?

Comments

Need an incentive over and above "a reduced fuel bill" to ensure that households attempt to undertake some measures – such as a Council tax rebate / refund etc.

11. (a) Should the Scottish Government consider whether a single mandatory condition standard (beyond the tolerable standard) should apply to all properties, irrespective of tenure?

Yes  No

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

Comments

Yes, because RSL's stock may incorporate properties in shared blocks and with shared common stairs and in some situations RSL's cannot improve their stock if co- owners are not incentivised to participate.

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

Yes  No

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

Comments

Add in

Review tariffs / type of meters to ensure not paying too high a premium for supply in that format.

For landlords, the internals of the property have to be desirable, kitchen, bathroom, electrics, heating, and this needs to be addressed in the listing.

13. Should local authorities be able to require that owners improve their properties, in the same way they can require that they repair them? For example, could poor energy efficiency be a trigger for a work notice? Please answer Yes or No and provide further explanation if you wish, for example on how this might work.

Yes  No

Comments

Yes, provided Local Authorities free up ways to access services and fund them. We have examples of a number of no fines properties sold through RTB – sitting alongside our RSL properties with poor efficiency ratings.

Also this would have to be appropriate to house type – stone built period property – cannot insulate walls outside or inside without losing historical qualities of building.

14. Should local authorities have a power to enforce decisions taken by owners under the title deeds, tenement management scheme or by unanimity? For example, should they have explicit powers to pay missing shares of owners who are not paying for communal repair work, in the same way they can for agreed maintenance work? Please answer Yes or No and provide further explanation, if you wish.

Yes  No

Comments

If Local Authorities took on this role of missing shares then it could be a catalyst to allow schemes of energy efficiency works to move forward.

RSL's have no power to enforce non-essential works and any funding for owners sourced by them would carry premium which would need to be re-charged, adding to the cost and affecting viability of the schemes for owners.

15. Should local authorities be able to automatically issue maintenance orders on any property which has had a work notice? Please provide further explanation if you wish.

Yes  No

Comments

16. Should the process for using maintenance orders be streamlined, and if so, how? Please answer Yes or No and provide further explanation, if you wish.

Yes  No

Comments

17. Should local authorities be able to: a. issue work notices on housing affecting the amenity, and b. require work such as to improve safety and security on properties which are outwith a Housing Renewal area? Please answer Yes or No and provide further explanation if you wish.

Yes  No

Comments

18. Should local authorities be able to issue repayment charges for work done on commercial properties, in the same way they can for residential premises? Please answer Yes or No and provide further explanation below, if you wish.

Yes  No

Comments

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

Comments

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

Comments

Recognising that 85% of housing stock is existing –provision of a library of

case studies for house types, available for public perusal, showing stepped measures to improve energy efficiency including cost, payback period and the expected improvement in Energy ratings would give all householders the chance to see what could be achievable.

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

Comments

RSL's own only a small part of the total housing stock – it would be unfair to be the only tenure targeted.

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

Comments

Payback modelling – to show how much to invest and the potential annual benefit. At present recommended measures show potential improvement to ratings however it is generally the monetary calculations that will focus choice.

Also add in current performance against “2020” or “new” target.

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

Comments

At present you can only access the Register of EPCs in Scotland if you have the licence to produce them – so it will be costly for the RSL to update EPC records as it would involve your survey company.

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

Regarding Option (4) requiring that Energy Report recommendations are

carried out when a house is sold or rented – need to bear in mind that existing boiler or heating system may not be at end of useful life and to renew components ahead of life cycle would not achieve value for money for the RSL.

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

We agree that issues in the private sector need to be addressed as RSL's only have influence on a small share of Scotland's housing stock. RSL's should not be the only sector bearing the burden of achieving carbon reduction in housing.

27. If you agree with Q26, should houses of the same type in the social and private sectors be expected to meet the same standard?

Yes  No

Comments

Yes however we are very aware that the 2020 target is ambitious, a longer lead in period would be preferred.

28. Are there other specific issues we need to consider in introducing regulation on the energy efficiency of the home for particular groups of people, for example older people, those with disabilities, people from minority ethnic communities?

Comments

Accessibility to funding will be the key, especially for households with carers. Preferable for RSL to be funded to undertake the works as have expertise to arrange, plan and organize for households with varying needs.

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

Yes  No

Comments

Trigger point at point of rental would

- create difficulties for budgeting as RSL's do not have any control on numbers of properties becoming vacant and when.

- burdensome for the smooth allocation of properties to those on housing waiting lists and would create additional delay.

30. Should rollout of any regulation across the owner occupied and PRS sectors be phased or all at once? If you think that rollout should be phased how do you think this should be done?

Yes  No

Comments

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

Comments

32. In sections 2.76-2.79 we suggest that one way of regulating would be to issue sanctions.

(a) Do you think that sanctions on owners should be used to enforce regulations?

Yes  No

(b) Should owners be able to pass the sanction or obligation on to buyers?

Yes  No

Comments

33. The Scottish Government does not intend to regulate before 2015. The working group will consider what options for timing of any regulation might be appropriate, but, given all the points set out in sections 2.80-2.81, from when do you think it might be appropriate to apply regulations?

Comments

Staged from 2020 onwards – however as an RSL with widespread stock of wide ranging types – we will have some meeting standard and some will require significant measures due to build type. We view a percentage target to achieve in stages would allow the necessary continued investment in other key property components, kitchens, bathrooms, electrical systems etc.

34. (a) In Section ~~(3.4)~~ 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?

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

Greater publication of ideas, solutions and costs for standard house types across the sectors will assist householders and RSL's to make informed choices on what to invest and likely payback.

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

Comments

After sufficient opportunity for social rented properties, quality schooling, green space, public transport, retail, adequate number and quality of community facilities are the basic requirements.

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

Need to consider life expectancy of the built product and the potential for early failure. Modelling the maintenance and repair cycles together with methods to achieve higher regulatory energy efficiency standards will be essential to see long term outcome. Some of our poorest quality properties are system builds which fitted the innovative construction label in 1960's to 1980's but which are now hard to heat.

Detailed cost analysis of the Housing Innovative Showcase properties should be readily available for public perusal.

Regarding "unwillingness to be early adopters", we are keen to undertake new methods / designs / technologies but we adopt a weighted analysis of methods available – method has to be cost effective, value for money, give maximum life expectancy and give sufficient level of comfort in a controllable format for each household. Whilst new technologies are being tested reliable case study data covering cost and use is not readily available.

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

#### Comments

Life expectancy and life cycle costing of the innovative method needs to equal or better those for traditional masonry cavity wall or timber frame construction before they could be considered.

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

During the early 2000's funding packages were available to tenants themselves and these were controlled by Contractors. RSL's provided approval to undertake works and on many occasions received notification that works had been completed. We are now getting a significant number of enquiries from tenants and energy surveyors stating that "previous measures" were never carried out although they formed part of our bids.

In this respect it is a challenge is to ensure that works are quality checked both for location, and installation, by the grant provider, and that accurate feedback is provided for the RSL.

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