

**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

No Comment.

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

Main barriers are: Cost for hard to treat properties ie older stone build houses that could not (for a variety of reasons) be externally treated. Disruption involved for treating these properties with an internal wall insulation package.

The high cost of renewable heating systems compared with an extended payback time could deter some owners from investment. Owners would need to be given a financial incentive to invest. They would need to see their investment making a surplus rather than simply a neutral cost position as proposed in the Green Deal Golden Rule. Owners' homes should also be expected to comply with minimum energy efficiency standards with powers made available to the authorities to enforce these standards.

For private owners, uncertainty about the most appropriate renewable heating system for their home given the wide range of options currently available on the market. This would be particularly the case for older and vulnerable owners.

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

Increased funding contribution either from central government or the fuel utilities for current high cost measures. Either high investment in some form of grant scheme that would cover most if not all of the costs involved *or* an interest free loan scheme tied into any mortgage or utility bills *or* new legislation preventing the sale/purchase of properties without a suitable SAP rating. For owners, independent advice on the most suitable systems for their homes. Older and vulnerable owners may need support similar to Care & Repair services to assist them through the whole installation process. Obviously, appropriate powers to enforce minimum standards would need to be introduced to compel owners to install measures. These should be linked to financial incentives to owners to install measures but should also be sensitive to circumstances where enforcement could lead to financial hardship for households.

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

In buildings where energy efficiency measures are being installed to common areas – e.g. external cladding or common solar panels – there

could be opposition from some owners to installation proposals or to contribute towards the cost. In these cases, there may need to be enforcement powers available to other owners or local authorities. Planning restrictions may prevent the installation of external fabric measures to many older, historic and stone-built buildings. In addition, owners may be unwilling to change the fabric and character of their building. Internal insulation measures in these buildings may also be inappropriate. For these buildings, it may not be appropriate to apply enforcement powers in respect of minimum standards. Renewable heating systems would be more suitable but obviously this could be a high cost solution beyond the financial means of the owners. Specific financial incentives/grant arrangements may need to be developed for these buildings. A one-stop shop would make it easier for homeowners to access expertise, funding opportunities and installation contracts in order that they can consider carrying out the most cost-effective energy improvements to their homes.

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

Increased funding for renewable heating where properties are 'off-gas' and cannot access all fuel types. Greater use of renewable energy sources. Installers need to be encouraged to include these areas as well as more populated areas. Additional financial assistance may also be required to encourage more basic repair work to be carried out. (Rural home owners are invariably on lower incomes and the general condition of many rural properties is lower than most urban homes)

5. (b) How should these be addressed?

Either high investment in some form of grant scheme that would cover most if not all of the costs involved or an interest free loan scheme tied into any mortgage or utility bills. (Although Housing Grant funding continues to be reduced, historically, it was a good driver to encourage repairs and improvements). However, any type of funding must be easy to access and even easier to understand!

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?

Councils should play a lead role in encouraging works to be carried out but with reducing staff resources this would prove challenging. Perhaps a Framework with other authorities and private companies to provide the necessary financial skills with councils providing active support in promotion on an area basis.

LA's need to play the key role in distributing Green Deal and Energy Company Obligation (ECO) funding to drive the delivery of retrofit programmes in their areas. There are clear advantages to be gained from linking this role to LA's strategic responsibilities for improving house

condition and addressing Fuel Poverty. This would enable LAs to use Green Deal and ECO funding to deliver a retrofit programme that would address local fuel poverty and other strategic priorities and maximise benefits to households and communities in most need. The “need based” approach to the distribution of ECO funding from a Scottish Government managed pot would be the most attractive as this would ensure that resources are directed to installing measures to the homes of those households with the highest levels of Fuel Poverty.

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

Overall monitoring and coordination of the various schemes available, with appropriate central government support made available to local authorities to enable promotion as per item 6. Government would need to provide large scale funding, national advertising, accreditation scheme for providers.

Agree that the Scottish Government should have a key role in securing funding, allocating funding to LAs for distribution to households and in driving the procurement efficiencies of a national retrofit programme.

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

Consideration of tax incentives to promote energy efficiency. A specifically Scottish dimension could be developed for Green Deal and ECO obligations on energy companies.

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

Wider promotion of initiatives and more coordinated approach. This needs a cultural change in attitudes by home owners to “invest” in a low carbon lifestyle. Owners need to become more aware of both energy efficiency and a more importantly “what’s in it for them” before this can happen.

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)?

Access to dedicated support tailored to the applicants specific needs, including a wide range of expertise, clear funding options and cost effective installation contracts in order to carry out the most appropriate energy improvements to their homes.

A Council led Advice & Information team that can assist qualifying clients with a more “hand holding” approach to ensure work can be carried out with as little confusion and/or disruption to this more vulnerable client base.

Inter-agency working with the Care services/NHS as part of the delivery

programme to older and vulnerable people's homes.

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?

Yes, many owners will resist the installation of measures. A single minimum standard would need to be sensitive to the range of properties within Scotland and the ease or difficulty with which measures can be installed and also to the financial and personal circumstances of each household.

LAs would be the most appropriate local agency to enforce standards.

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.

Item 5 should be changed from 'boiler' to 'heating system', unless this refers only to properties which have gas available as a heating fuel. We would agree with the proposed hierarchy though for older and disabled people the house would need to be suitable for adaptation.

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

Possibility of a restriction on selling/purchasing a property that is not energy efficient. However, this power must be restricted to energy efficiency only and not for other improvement works

Yes, poor efficiency may be more appropriate for a Works Notice in buildings that require common installation measures. Such notice could also apply to the Private Rented sector.

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

Yes, this would be appropriate but only if councils had finances available to them.

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

This would assist in keeping the property in a reasonable state of repair or its 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

Yes, it would need to be streamlined to be effective. A lengthy, complex process with an uncertain outcome could deter the issuing of Notices.

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

Yes, powers already available under the 2006 Housing (Scotland) Act to issue notices for properties outwith HRA's. Not all energy inefficient properties requiring notices will be grouped in a potential HRA.

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

Yes, for common installation measures

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

Powers already available in new Property Factors Act 2011.

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

A cultural change is required perhaps through advertising campaigns or the reduction of Council Tax for a more efficient house. Actions could also include appropriate financial incentives to install energy efficiency measures, minimum standards, appropriate enforcement powers and a well resourced advice and information network.

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

Yes, this would increase the energy efficiency of a number of properties in the private sector.

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

No Comment

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

Care must be taken to ensure that those in most need (elderly, disabled, fuel poor) are not further discriminated against.

The impact of any potential legislation should be fully risk assessed to ensure that it does not have any detrimental effect on either local or national housing markets.

Regulations must take care not to create financial hardship for households and should be sensitive to building form and construction as well as planning regulations.

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

Regulation could only be used when properties are purchased with punitive measures introduced for non-compliance, although as noted above, the impact of legislation needs to be balanced against market effects.

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?

Option 1 should not be considered as the number of properties falling out with this ie no loft insulation or cavity fill, would be low.

Option 4 would be appropriate as the works would be carried out when the

property in vacant.

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

Tenure should not be a stumbling block for regulations

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

This is considered to be feasible, however given the wider range of properties within the private sector a number of other house 'types' may have to be developed.

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?

Appropriate types of support, expertise, funding options and installation contracts should be offered to all such groups in order that they can be assisted in carrying out the most cost-effective energy improvements to their homes

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

Yes  No

Other trigger points may include when other work (that requires building regulations/ planning) is being carried out not specifically connected to energy efficiency and should apply to the property as a whole. Boiler replacement could also be used as a trigger. This should not replace any area based incentive schemes.

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

It may be that a phased introduction would be preferable to allow some capacity building within the sector. Could any roll out be linked to council tax bands ie Band 1 first alongside energy efficiency ratings. Needs to be a simple approach to avoid confusion on part of householders

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

No Comment

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

The range of proposed sanctions would require wide consultation to ensure that they are reasonable and do not have a negative effect on the housing market. Sanction may be passed on to the new owner. However, work must be carried out before property becomes occupied as policing this would be impossible. Sanctions may be more appropriate where others are affected, e.g. in common buildings and in the private rented sector

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

2015 may be too early given the work required to both detail the proposed regulations and implement. Regulation could possibly come in to force in 2020 to allow time for a national retrofit programme to gain momentum

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?

No Comment

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?

Possible discount on lending rates based on the level of energy efficiency of a property

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?

Any benefits to the home owner must be fully explained Installers need to be trusted.

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?

More needs to be done to convince home owners that energy efficiency works are of benefit to them now and in the long term.

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

This should be reflected in Planning and Building Regulations

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?

Building Regulations are the key to ensuring higher standards of construction. Higher standards will drive innovation in construction, procurement and use of innovative technologies. Land values are a key driver leading to the high cost of housing. Planning policies should aim to increase land supply to drive down land values.

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

Agree that SG has important role in promoting innovation but construction sector is cost and profit driven and not transform unless required. New technologies have a higher risk of failure and SG has a role in important role in promoting research, testing and the accreditation of new products.

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?

£4,000 is not a significant incentive compared with the additional cost of some features and the overall cost of building. The current reduced level of subsidy for affordable housing development constrains the viability of projects, particularly in the RSL sector. As many housing providers are unable to develop at the current subsidy level, the additional funding for energy efficiency is not relevant and would not be taken up. The incentives available for energy efficiency measures have to be seen in the context of a wider review of the ability of the current subsidy system to promote affordable housing development. The level of incentive required to promote energy efficiency would need to form part of this review.

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

Reduction on cost of these technologies and products, and changes to current Building Regulations.

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?

No Comment

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

Increased Government funding for training schemes.

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?

No Comment

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

Wide access to a range of fully funded tailored training schemes, ensuring that they cater for all groups equitably, through a national framework.

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 Comment

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.

No Comment