

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 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...Trade Association	x

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

The NFRC believes that there is a need to highlight the importance of ensuring that properties are in a good state of repair. There is little point in installing a Smart Meter if there is water ingress and excessive drafts. The Scottish Housing Condition Survey 2010 stated: 81% of dwellings in Scotland have some disrepair and of those, 73% had some disrepair to critical elements. Critical elements are those whose condition is central to a dwelling being wind and weather proof, structurally stable and safeguard against further rapid deterioration.

The government has acknowledged that "Improving Condition Homes can only become more energy efficient if they are in a [good state of repair](#)." The issue of disrepair to Scotland's homes is of paramount importance before we start to look at other ways to minimising the energy required to heat the buildings.

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

The NFRC believes that more emphasis should be placed on raising the standard of current buildings condition. As identified by the government, "Improving Condition Homes can only become more energy efficient if they are in a [good state of repair](#)." The concern here is when one, or more, in a block of flats resists (or cannot afford) essential repairs to properties this can either stop any repairs or create an administrative (and possibly financial) burden on the local authority to ensure that these repairs are undertaken.

There is also a wide range of materials used in Scotland's building stock and this can result in different insulation solutions required and property owners are not aware of the appropriate insulation for their property and therefore don't do anything.

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

Better education of property owners regarding the need to repair and maintain their properties.

It is not always a case of properties spending more money but empowering them to make an informed decision on the repairs and maintenance their property might have.

As there is a wide range of materials used in Scotland's building stock,

property owners have to be able to easily determine the appropriate repairs and maintenance for their building. Once this has been achieved they also need to access information on the appropriate insulations to install which will not compromise the structure of the building.

If a scheme was developed, which property owners subscribe to, which would undertake an independent survey on their property and then give advice on appropriate repairs, maintenance and insulation, this would give property owners the information required to make an informed decision regarding work to be undertaken on their property.

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

Full and independent survey to determine the condition of their property and determine the appropriate insulation and microrenewables which will be appropriate for their building.

There is concern that those with commercial interest in reducing the fuel consumption of properties will sell property owners inappropriate systems. They could also sell their systems when the fabric of the building requires repairs to critical elements of it.

Then when property owner need to address these disrepairs as there could be water ingress to their property, they no longer have the funds to have this work done but have lovely new windows/doors and solar panels.

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

The access to mains supplies for all power.

Appropriate repairs and maintenance on their properties depending on the structure of the property.

Access to skilled work people to undertake repairs and maintenance of the property as there are geographical gaps in college provision key for apprenticeships in key building skills.

5. (b) How should these be addressed?

Develop a Building MOT scheme for property owners to subscribe to and therefore empower them to determine the appropriate repairs and maintenance of their property.

Ensure that current college provision of key building skills is not reduced. While we would all like these building skills to be widely taught at colleges, the cost of this is not practical.

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

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

Ensure that properties fulfil the guidance within this consultation "Looking after your home - a hierarchy of needs" when undertaking funding through the Green Deal or other sources.

Allow property owners to claim funding through the Green Deal for repairs and maintenance on their building. The problem here would be identifying the potential savings to ensure that the work meets the "Golden Rule" but we believe that research should be done in this area to try and assist property owners in fulfilling the "Looking after your home - a hierarchy of needs".

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

As indicated in the consultation, Scotland's building stock differs from that of the rest of Britain and therefore alternative mechanisms could be required to meet the challenges in Scotland.

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

Get all properties wind and watertight.

This can be achieved by initially concentrating on registered social landlords and council properties.

2010 Scottish Housing Condition Survey stated:
81% of dwellings in Scotland have some form of disrepair

90% of Local Authority/other public dwellings were found to have disrepair

Urgent Disrepair – In just under half of dwellings with some form of disrepair, that disrepair is urgent and around a third suffered from extensive disrepair.

73% of dwellings with disrepair had some disrepair to critical elements (critical elements are those whose condition is central to a dwelling being wind and weather proof, structurally stable and safeguard against further rapid deterioration)

Disrepair to critical elements:

Owner-occupier – 56%

Local Authority/other public – 73%

Housing Association/co-op – 46%

Private rented – 67%

Private sector – 58%

Social sector – 62%

The survey showed that the likelihood of experiencing disrepair to critical elements increased with the age of the dwelling. 76% of pre – 1919 dwellings had some form of disrepair to critical elements compared to 24% of those built after 1982.

Therefore we believe that concentrating efforts on local authority and registered social landlords to get their properties into a good state of repair as essential. We would also suggest a programme that addresses the issue of pre – 1919 dwellings as the initial project.

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)?

The NFRC receives many phone calls from the vulnerable who express concern about approaching trades persons for routine work as they fear being financially exploited and poor standard of work.

If the government was to introduce a scheme where property owners paid a subscription and received regular independent surveys of their property it would empower the property owners to approach a contractor asking him/her to quote only on the work identified by the surveyor.

It has been identified that there is a wide array of structure types and materials used within Scotland's buildings.

A system to approve contractors for specific type(s) of work under the scheme would assist the property owner in identifying a contractor with the appropriate skills for the work.

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?

No at this stage.

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

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

Unenforceable at this stage.

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

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 will save the property owners money in the long-run by ensuring the property does not fall back into a state of disrepair.

The property owners have already demonstrated a lack of ability or interest in maintaining their property in the past if a work notice has had to be issued.

The government has stated it is committed to increasing the supply of housing across all tenures and is bringing forward legislation to help ensure that housing, and funding for housing, are used more efficiently in Scotland through the Council Tax Levy (Charge on Empty Houses) Bill.

By stopping properties falling back into disrepair, it will assist the government in achieving its commitment to increase the supply of housing.

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

Yes x No

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 x No

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

Yes x No

Comments

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

We have not opinion 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?

Make it a requirement when selling a property to include details of the last three years energy costs for the property. This would be far more effective than an EPC.

Make it a requirement for energy companies to send this information on an annual basis.

When purchasing new goods, such as cars or white goods, the EPC or MPG are easily calculated. However, there are many factors which influence the fuel efficiency of a property and these might not always be apparent when the assessor undertakes an EPC on an individual property.

Purchasers are advised of the council tax band (which can often be less than the fuel bills) but a summary of fuel consumption should also be required.

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

No, this could lead to property owners undertaking inappropriate insulation of their properties to meet the standards which could compromise the integrity of the building structure.

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

Include a summary of domestic fuel costs for the property over the last three years.

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

Comments

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

Make a regulation that all properties which are rented have an annual review of the condition of the property and any maintenance issued to critical elements (as per the Scottish Housing Condition Survey) are undertaken within three months.

Ensure that properties fulfil the guidance within this consultation “Looking after your home - a hierarchy of needs” when undertaking funding through the Green Deal or other sources.

Allow property owners to claim funding through the Green Deal for repairs and maintenance on their building. The problem here would be identifying the potential savings to ensure that the work meets the “Golden Rule” but we believe that research should be done in this area to try and assist property owners in fulfilling the “Looking after your home - a hierarchy of needs”.

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?

Ensure that properties fulfil the guidance within this consultation “Looking after your home - a hierarchy of needs”.

26. Do you agree that any regulations for private sector housing ought to reflect the energy efficiency capacity of the property and/or location, as is proposed for the social sector?

Yes x No

This must also take into account the type of construction to ensure that appropriate insulation is made. The NFRC is concerned that those with traditional homes might undertake inappropriate insulation to meet regulations which could be to the detriment of the fabric of the building.

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

Yes x No

It is a confusing enough landscape without adding variations on regulations.

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

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

Yes x No

Those applying for funding through Green Deal should be required to ensure that their properties are wind and watertight and subscribe to a system of maintenance before being approved for such funding.

This should be done in line with the guidance within this consultation "Looking after your home - a hierarchy of needs" and ensure that steps one and two:

1. Make sure that your home is wind and watertight and that it is structurally sound; make sure that it stays that way by carrying out regular maintenance.
2. Make sure that work is done properly because poor quality repairs may be ineffective and can cost more in the long run.

Also, anyone applying for funding through a city heritage trust or townscape heritage initiative should be required to subscribe to a maintenance scheme as part of the funding to ensure that the disrepair does not reoccur in twenty years and therefore compromise the fuel efficiency of the property.

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

Yes x No

There needs to be a carrot and stick approach to this. The NFRC feels it imperative that property owners are empowered to undertake appropriate repairs and maintenance on their properties before any changes to regulations.

This could be done via a voluntary Building MOT Scheme which would survey properties, identify repairs/maintenance/insulation etc appropriate, identify contractors qualified to undertake the work and review the property condition on a regular basis.

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 x No

(b) Should owners be able to pass the sanction or obligation on to buyers?
Yes No x

If there are regulations in place and a property is not energy efficient it will reduce the value of the property by a considerable margin and therefore will become a self policing system except in extreme cases.

By making it a requirement to include details of the energy bill for the last three years it will raise the profile of the need to get, and keep, your property energy efficient and not just get it ready for the point of sale.

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?

The NFRC feels that having a scheme of empowerment to property owners to undertake work on their property must be in place before any regulation.

Therefore supply property owners with the information they require to adhere to the hierarchy entitled Looking after your home: What is most important?

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?

The NFRC is concerned regarding the ability to categorise properties along the EPC guidance. The NFRC feels publishing the properties energy consumption over the last three years at point of sale/rental would be a more accurate way of demonstrating the energy efficiency of a property.

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?

Raise the profile of the need to ensure that your property is regularly maintained for properties to remain fuel efficient.

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

Comments

39. Section 4.10 sets out the main challenges to address in taking forward our aim of new build transformation. What further challenges, if any, need to be addressed?

Comments

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

The SVQs for contractors must be kept up to date with emerging technology and delivery of this training as part of an apprenticeship and upskilling existing site operatives.

Unless there is a skilled, and qualified, workforce then there will be a resistance to design and install materials which require emerging technology for their fixing.

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?

The SVQs for contractors must be kept up to date with emerging technology and delivery of this training as part of an apprenticeship and upskilling existing site operatives.

Unless there is a skilled, and qualified, workforce then there will be a resistance to design and install materials which require emerging technology for their fixing.

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?

"Some in the industry perceive there is a lack of training provision and of training facilities and equipment."

This is not perceived. With only six colleges delivering roof slating and tiling across Scotland, there is a lack of training provision.

With only two colleges delivering stone masonry across Scotland, there is lack of training provision.

With no college (or SVQ) for Roof Leadwork, there is lack of training provision.

Therefore the level of training and in many companies in Scotland is purely in the hands of the employer and his/her knowledge.

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

At an absolute minimum, ensure that current college provision for key building trades is not reduced.

Being able to demonstrate the potential flow of work to allow contractors to take on apprentices. Several NFRC members have expressed interest in taking on apprentices but fear for future workload and an inability for them to complete their apprenticeship.

Develop a scheme for shared apprenticeships. If construction requires multi-skilled operatives then apprentices will require to get exposure to these skills in the workplace through several employers.

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?

Training should be accredited and on completion should result in an appropriate endorsement on an CSCS card.

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

By ensuring that there is sufficient college provision for key building skills across Scotland.

This will result in ensuring the quality of training and remove barriers such as travel to someone undertaking accredited training.

47. Apart from training and skills opportunities are there any other issues that should be addressed to make employment in construction and other industries becomes more representative?

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.

No college provision for certain areas for Scotland. There are models to address this but there still remains a high level of skills workers without the relevant qualifications for their trade.

This could be addressed by taking the courses to the islands by using a

mobile training rig and more training related to their apprenticeship being undertaken on site with accurate records kept.

They would then be required to complete a skills test, in their locality, on the mobile training rig before being approved for their SVQ.

The main concern here is to ensure that the quality of delivery and candidate remains high. However, any move along these lines would be an improvement to the existing model which is just not serving them.