

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

The vision of a step-change in the provision of energy efficient homes is entirely appropriate, but this must be done in tandem with a behaviour change drive to ensure that householders begin to recognise and avoid wrong or wasteful energy use, thus leading to savings rather than creating a rebound effect.

Programmes such as the Universal Home Insulation Scheme, which has been piloted in Orkney, indicate that an area-based retrofit programme would be ideal.

With Orkney having the second highest rate of fuel poverty in Scotland, and – as an archipelago - having a defined boundary, the expectation would be that the county would be high up the list of targets for early work, given the high savings that could be achieved.

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

For landlords the main barriers will include:

- the potential of decant costs if measures cannot be installed with tenants in the house;
- the complexity of pinning down the necessary funding;
- the availability of suitably skilled workforce to carry out the measures

For tenants the potential for disruption, upheaval and intrusion is seen as off-putting – for example with the emptying lofts or rooms.

Often energy efficiency will not be top of their list of priorities, and in some cases loft top-ups have been refused despite messages from landlords of likely savings, more comfort, the need to bring stock up to standard, et cetera.

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

Solutions could include:

- funding to cover any decant costs that might arise out of energy efficiency measures being carried out

- the creation of sufficient demand to create a sustainable local supply chain for energy efficiency work
- the provision of a support network to take away the disruption, for example for loft clearing for those unable to carry out the work themselves
- clear illustrations of potential savings to encourage householders to have work carried out

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

Specialist advice, such as that based on research that has been carried out by Historic Scotland's technical conservation group, needs to be made widely available for homeowners to have facts at hand when choosing what measures are right for their homes.

More advisors need to be 'on the ground' giving face-to-face advice in homes rather than relying on phone services.

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

Delivery needs to be by local, trusted organisations and contractors rather than firms that come into the area and carry out work that may not be up to standard and then disappear.

5. (b) How should these be addressed?

Fundamentally, the skilling up of the local workforce needs to be a priority to create confidence in the local market.

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?

A partnership between local authorities with similar circumstances, along with the relevant social housing providers in these areas might be beneficial in terms of sharing expertise and resources. In Orkney's case, for example, this might involve Shetland and the Western Isles, along with the local housing associations.

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

Comments

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?

Adequate and easily accessible funding is a fundamental requirement to allow the step-change required to reach targets.

Recognition that different audiences need different messages to bring them on board will be crucial, along with the effective delivery of these various messages

Generally the mainstreaming of energy efficiency among home improvements, so that they become part and parcel of 'doing up the house', rather than just sticking in a new kitchen/bathroom etc.

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)?

Engagement with different audiences must take place at community level:

- Groups/organisations that have 'seasons' of talks provide opportunities for 'energy efficiency advisors' to give presentations
- Services such as mobile libraries – or in the islands the ferry services - can carry information
- Social media sites, local radio, local newspapers, community newsletters
- Awareness raising through trusted contacts such as health visitors, community nurses 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

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

Comments

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

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?

This will include:

- Provision of information and use of behaviour change material (and tailoring this to particular audiences)
- Mainstreaming of energy efficiency through PR campaigns
- Increasing the awareness of the relevance of EPC information on how properties can be improved

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

Comments

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

The fundamental way that EPCs are produced means that areas of high renewable electricity generation such as Orkney, where 70% of the annual electricity demand is met by renewable generation, are penalised as the RdSAP does not recognise this.

Further to this, with the actual EPCs themselves

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

Comments

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

Comments

25. In section 2.68 we identify design options for the standard. Do you have any views on the options set out in that report? Are there other options that we should be considering?

Comments

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

Yes No

But with the ability to have exemptions based on:

- Cost-effectiveness of the measures, similar to the Green Deal's Golden Rule
- Applicable measures such as underfloor or internal wall insulation should only have to be carried out as part of overall refurbishment, as with the replacement of windows

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 would ensure that dwellings in the private rented sector, where some of the highest levels of fuel poverty are likely to be found, are improved to the same level as the social rented sector.

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 No

Comments

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

Yes No

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

34. (a) In Section 3.4 we describe the range of legislative and policy levers that we believe are available to help us transform the financial market such that it values warm, high quality, low carbon homes. Do you agree that this is the full range of levers?

Yes No

34. (b) Can you suggest any other ways to help transform the market for more energy efficient, sustainable homes?

Comments

35. What changes would be required to current survey and lending practice to enable mortgage lenders to take account of the income from new technology or savings on energy bills?

Comments

36. Section 3.15 lists a range of challenges that may prevent the benefits of a more sustainable, energy efficient home being fully recognised in its value. What further challenges, if any, need to be addressed?

Comments

37. (a) Sections 3.16-3.22 set out the action that Scottish Government is currently developing to encourage greater recognition of the value of sustainable homes. Do you agree that this action is appropriate?

Yes No

37. (b) What further action is needed to influence consumers and the market?

Comments

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

Comments

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

Comments

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

Comments

41. What further changes to the operation of the Government's affordable housing supply programme would help to enable it to champion greener construction methods and technologies in the medium term?

The provision of a more realistic level of subsidy. An enhanced benchmark figure of £4000 has been given so there is a recognition that there will be an additional cost, but this is still not at a realistic level.

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?

The main challenges from Orkney's point of view are more readily addressed in Question 48.

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

The assurances that firms won't be wasting their time – see the answer at Question 48.

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.

While there is brief mention in Chapter 5 of the fact that there may be lack of skills, or people in the wrong location, there will be specific issues around addressing the situation in areas such as Orkney.

Orkney not only has the second highest fuel poverty figures in Scotland, but it is also likely to have difficulties in providing a local workforce with suitable skills to tackle the upgrades to the islands' aging housing stock, which in itself is one of the main causes of the fuel poverty, along with relatively low incomes and a wet and windy climate.

The preference for the Orkney population would obviously be to have trusted local firms carrying out the work, rather than a situation where a firm comes in from outside, does the work and then disappears again potentially leaving problems behind. However, there may be a hesitancy among local firms to train up their workforce, stemming from past experience where staff time has been spent assessing properties for the UHIS scheme, only for many of the households to decide not to go ahead with work, leaving the firms out of pocket.

Some way of building confidence among local firms that they will not be left in a similar situation would appear critical in ensuring that an area such as Orkney can overcome these issues and so have a fighting chance of reducing its fuel poverty levels.