

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

Yes. Figure 2 shows that the main gains are to be achieved by tackling the moderately performing flats and houses. Hardly any dwellings are poor performers.

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

Means-testing puts people off.

The grants only cover the cost of the installation, not the resulting disruption to fixtures, fittings, carpets and decoration. Most people who are eligible for financial assistance can't afford these attendant costs.

The case study in box 2 highlights the complex bureaucracy involved with Mrs P being referred to 3 agencies. Only the most enthusiastic customers will make themselves available for the numerous surveys and assessments required. A one-stop system would improve take-up.

A lot of people can't handle the disruption involved, don't understand the technicalities, don't trust builders, and have often justifiable fears of poor workmanship and value for money.

Private landlords, especially those who are renting out properties for a short period before selling them, are generally more interested in maximising their returns (or minimising losses) than investing in improvements. Demand for private rented accommodation in Partick is such that prospective tenants are unlikely to refuse a tenancy on the ground of energy inefficiency.

In mixed tenure tenements the consent and financial contribution of other owners is required for improvements to common areas. Owners are often unwilling to contribute to the cost of basic common repairs, e. g roof leaks, unless their flat is directly affected. Energy efficiency improvements which have less tangible benefits, e. g. tenement loft insulation, are often a low priority for owners with limited disposable income. The link between asset value and energy efficiency only becomes an issue for owners if they are in the process of selling their flat.

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

The majority of the untreated stock in Partick is traditional pre-1919 tenement flats with solid walls. The physical improvements possible are limited as over cladding is not an option. The key to persuading owners to participate in energy efficiency capital programmes (window replacement, boiler replacement, loft insulation, draught-proofing) is offering more generous and non-means tested financial incentives, and appointing a single local agent to deliver the programme.

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

See 3 above

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

5. (b) How should these be addressed?

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?

Green deal programmes need to be delivered by locally trusted organisations with reputation and track record of delivering effective improvements. Involving the local authority may deter owner-occupiers from participating as it will be seen as a social housing programme. Green deal depends on owners being willing to take on a long term debt to cover capital costs. The compensating savings from reduced bills in the future cannot be guaranteed. The pay-back only works for stable households who are intending to live in their present accommodation indefinitely. It is unlikely to attract short-term landlords, private tenants and owners who intend or may have to move.

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

The Scottish Government should institute its own capital funding programme to complement the range of advice centres currently supported. Calls for relaxation of building standards should be resisted.

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

Devolution of ECO, Green Deal, FIT and RHI would eliminate layers of unnecessary bureaucracy.

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

Action in relation to local authority and RSL stock has been successful to date. The focus should now shift to the private rented sector and marginal owner-occupiers. The barriers here are not necessarily technical but relate to a reluctance to invest in assets due to owners and landlords having a short term outlook and limited discretionary spending power.

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 means for accessing funding and for implementing capital works should be radically simplified and delivered via locally trusted organisations.

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 should be enforced by being registered on the title deeds so that prospective tenants and owners know whether the building complies or not. LAs and RSLs should be required to comply via the Energy Efficiency Standard for Social Housing.

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.

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

Local Authorities should do more to support responsible factors or residents who want to implement energy efficiency improvement works (or even basic repairs) but who are prevented from doing so by a minority of residents who can't or won't pay their share of the costs.

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, but the problem here is that if owners know that the LA will step in to cover their share they will be less likely to agree voluntarily. Most private factors will not carry out any work (even basic repairs) until all residents have paid their shares of the cost in advance.

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

However in Glasgow there is already a huge backlog of maintenance order work to be done. The experience in Edinburgh has caused a loss of trust in local authorities' ability to manage the maintenance order system. Without the ability to resource the work effectively the extension of the maintenance order system to cover energy efficiency improvements risks replicating the same problems.

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

There seems to be a long bureaucratic delay between the order being issued and works being implemented.

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

The types of work covered by work notices and the areas in which they can be issued should be extended as far as possible

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, this is a major problem in Partick where commercial owners on the ground floors of tenement closed frequently veto even basic repair works.

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

The Property Factors (Scotland) Act 2011 has improved this. The amendment proposed in 2.30 Option would remove the veto from commercial owners and help owners to switch to proactive factors who are committed to implementing energy efficiency improvements.

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

Estate Agents and letting agents should be required to state the energy efficiency of properties on all advertising materials in the same way that car retailers do.

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

Yes the same minimum standards should apply to all housing regardless of tenure

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

See 20 above

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

The key principles are correct

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

The link between poor energy efficiency and eligibility for capital funding for improvements needs to be more clearly established i. e. not based on area, means-testing or tenure.

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 (3) would be the simplest to explain and administer

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

The regulations should be tenure neutral

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

See 26 above

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 same regulations should apply to all tenures and types of occupancy

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

Yes No

Additional trigger points could be when any warrantable work or planning consent is required.

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

For the sake of simplicity roll-out should be all at once – this would achieve maximum publicity.

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

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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

This would establish a strong link between a property's market value and its energy efficiency rating.

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?

As soon as possible after 2015

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?

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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?

Better training for surveyors

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?

See 35 above

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?

Stronger link between prices and energy efficiency performance

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

New neighbourhoods should be integrated with existing neighbourhoods and should reduce reliance on cars.

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?

Transformation of the new build market will be difficult while the market is dormant. Current market conditions and lending practices (to developers and buyers) favour out-of-town or peripheral low density high-end developments. There has been a sharp decline in more efficient developments (flatted and integrated within existing communities). Funding to the RSL sector should be increased to kick-start this type of sustainable development.

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

The costs of MMR need to reduce before they will be widely adopted by the construction industry.

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 current HAG targets of £46,000 per unit for Building warrant Silver Level is unsustainable. The government needs to recognise that its strategies of improving the energy efficiency of the AHSP out-put while reducing the AHSP are inconsistent.

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 construction industry will always deliver the most risk free and profitable output. The resulting tendency to resist innovation, both in construction methods and design, is more acute when the industry is in recession. The AHSP needs to be prioritised to counter this tendency.

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?

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

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?

The funding available for training etc. provides for part of the cost, requiring employers to meet the rest. It's difficult to see how the construction industry can be encouraged to invest in training, even with the support available, when the industry is in recession and survival is the priority for most companies.

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

The construction industry remains a white male dominated environment. A lot more engagement with other groups needs to take place before this will change.

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 46 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.