

**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 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 checked="" 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

Yes the vision and objectives as set out in the consultation document are appropriate for Scotland's Sustainable Housing Strategy. The vision is a clear, concise statement of intent that looks to deliver long term actions while also tackling the urgent societal problem of fuel poverty in the short term.

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

The challenges identified within the consultation document, namely householder apathy and the perceived hassle of installation, are the main barriers to action. Underlying these is a lack of understanding about the benefits of energy efficiency which go beyond energy bill savings such as thermal comfort and, depending on the measures installed, improved acoustic performance and aesthetics. For homeowners the upfront cost of installation can be a deterrent to action while a failure to engage with schemes offering free and discounted measures could be caused by a lack of trust in either the energy company or the individuals promoting the schemes. For landlords there is also the issue of split incentives where the landlord pays for the work but the tenant enjoys the benefits of it.

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

The Green Deal seeks to overcome the problems of upfront cost and split incentives. The roll out of a Scottish Government backed consumer awareness and engagement campaign which informs consumers about the options available and the benefits of having the works done supported by case studies and testimonials from homeowners could build awareness and trust. Such a campaign could be delivered under the 'Greener Together' programme. Fiscal incentives are tangible to consumers and could range from short term 'cash back' style incentives to longer term incentives such as reduced council tax, stamp duty and inheritance tax.

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

One of the key aspects of dealing with a diverse range of housing is having trained and accredited assessors able to distinguish between housing types and advise on suitable measures for the property in question.

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

It is likely when improving energy efficiency in rural areas, including remote and island areas, that there will be cost implications for labour and transport that may not be an issue for urban areas.

5. (b) How should these be addressed?

It will be important to attempt to leverage as many economies of scale as possible by taking an area based approach, ensuring that potential eligibility for ECO funding is determined and that funding is drawn in and setting an incentive framework in place which encourages homeowners to participate in an area based programme.

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?

As identified within the consultation document, local councils are well placed to play a key role in delivering the National Retrofit Programme. Other bodies such as RSLs, community bodies and private companies will also have an important part to play and therefore the role of the local council should include oversight and co-ordination to ensure all players are working together to deliver the maximum benefit for Scottish households,

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

The Scottish Government should act as the overall oversight body, placing requirements on local councils to set targets and milestones for their stock and reporting on progress against these targets. This will give the Scottish Government sight of how well different areas are progressing to deliver against the goals of the National Retrofit Programme and where additional support may be required.

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?

Communicating the benefits of energy efficiency to households, a strong fiscal incentive programme and increasing the value of energy efficient homes as discussed elsewhere within this response are all important components of driving a step change in retrofitting energy efficiency measures in new homes.

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)?

Ensuring that the delivery model for the National Retrofit Programme integrates with the work of local bodies that engage with older people, those from ethnic minorities and those with a long term illness or disability to ensure that these groups have equal access to help and support to improve the energy efficiency of their properties.

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?

There is an obvious difficulty in enforcing minimum condition standards in private tenure households in that there is little or no oversight on house condition as there is in the social rented sector. A key trigger point for inspecting and enforcing minimum standards would be at change of ownership (where responsibility could sit with either the outgoing or incoming occupant with a deadline for improvement), or when notifiable works are taking place to the property.

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.

The proposed hierarchy of needs is a good summary guide to what a householder should consider. However more detailed guidance should be made available. For example how can a householder ensure that work is done properly, how can they determine what is appropriate insulation and how efficient should a boiler be?

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

Giving Local Authorities the power to require owners to improve their properties would be important for improvement of mixed tenure blocks but

all reasonable steps should be taken to secure agreement from private residents prior to issuing a works notice including negotiating with the social landlords to extend funding to an area or block to cover private tenure households also.

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

Subject to offering appropriate arbitration and support to resolve differences before taking enforcement action.

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

This is not a subject within our area of expertise.

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?

This is not a subject within our area of expertise.

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

The proposals within the consultation document to increase the value placed on energy efficient homes will play an important part in increasing importance of this issue to owners and tenants.

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

Yes. Minimum energy efficiency standards which are enforced at change of ownership and when significant improvement works are taking place encouraging use of the Green Deal, ECO and Scottish Government programmes would support the Scottish Government's ambition to ensure the improvement of existing housing stock.

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

Providing information with EPCs to highlight available sources of funding, particularly ECO for hard to treat properties, and advice services, such as the Green Deal Advice Line, would increase awareness of the help available to implement the measures suggested within the recommendations report.

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

Enforcement of regulation should always be the last resort only if engagement and support with private sector residents is unsuccessful in delivering improved energy efficiency.

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

Regulation could support the uptake of incentives if there is a comprehensive communication and enforcement regime in place to ensure home owners and landlords are aware of the implication of the regulations and the existence of incentives to help them meet their obligation. As described elsewhere, support and advice should always be offered ahead of enforcement.

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 4 requiring that recommendations from the Energy Report (up to a cost limit) are applied when a house is sold or rented would ensure that requirements are relevant to the property in question and applied at a key trigger point at change of ownership. The cost limit applied should also take into account the availability of ECO funding for more expensive measures which would make these cost effective. Another trigger which should be considered is when notifiable improvement works such as increases in habitable space are undertaken as having energy efficiency measures installed at the same time as other works minimises the disruption to homeowners. The Scottish Building Regulations already support such an approach by applying a framework which encourages carrying out energy efficiency improvements when other works are carried out.

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

We strongly support his approach as it enables all homes to make a contribution in proportion to the capacity for improvement and does not put in place conflicting requirements in mixed tenure blocks.

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

Requirements for private and social sectors should be aligned so the occupants of either are not disadvantaged by having lower standards of performance set.

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?

Ensure appropriate engagement and support services are available for particular groups of people.

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

Yes  No

As discussed elsewhere in this response, introducing trigger points when other major works are being carried out would act to increase the number of

properties improved and having energy efficiency improvements carried out at the same time as significant other works reduced the disruption to the homeowner. The Scottish Building Regulations already encourage such an approach.

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

Introducing minimum standards in areas which have access to area based incentive schemes and targeting the poorest performing homes would be an appropriate way of phasing in regulations.

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

Engaging with homeowners and offering advice and support to meet their obligations should be undertaken before enforcement action.

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

We would support this subject to robust requirements around disclosure being introduced to ensure that this obligation was clearly communicated to and understood by buyers at an early stage in the purchase process.

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 stated it will be important to have clarity about what regulations will be applied from which date. With this in mind, decisions regarding the type of regulations that might be introduced should be communicated at the earliest opportunity. For example, the regulation of the PRS in England and Wales has been set out as an option which may or may not be applied depending on improvements made in this sector in the meantime. This sends a clear signal and timeframe to private sector landlords to undertake improvement works on their properties ahead of the regulation date to ensure they can continue to rent their properties in the long term.



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?

As described in the consultation, restructuring council tax and the Scottish replacement for stamp duty land tax would provide a long term fiscal benefit for energy efficient homes which will significantly improve home owners' perception of the value of energy efficient homes. Making information on energy efficiency visible through including EPC information on sales and rental adverts would increase awareness. The availability of funding support such as the Green Deal and ECO should also be promoted.

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?

A relatively simple tool could be commissioned for surveyors that calculates the income from renewable technology incentive schemes and the typical energy running costs depending on the EPC rating when compared to similar homes of an average rating. This information could be displayed within the Home Report.

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?

The challenges listed in Section 3.15 represent the main challenges to energy efficiency being recognised in house values.

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?

We strongly support the action proposed by the Scottish Government to encourage greater recognition of the value of sustainable homes. Having education and awareness at the heart of the proposals to raise expectations and understanding of homeowners will be essential in creating the cultural shift needed to have the value of energy efficiency recognised.

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

The steps that the Scottish Government has taken to address the need to design and develop sustainable neighbourhoods already represent a significant step towards achieving this aim by encouraging consideration of the main issues at the design stage and putting in place high performance standards through 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?

There is growing recognition of a performance gap between design and as-built performance. This represents a challenge to achieving the high performance standards for new housing in reality which impacts on the perceived performance of new homes. This is a highly complex area and we are only just starting to understand the impact of installation quality and construction techniques on delivered performance. Introducing a quality assurance scheme for installers would help raise standards. Where an installer chooses not to follow a quality assurance scheme, a design penalty should be applied so the building is effectively “overdesigned” to mitigate the risk of underperformance. Rockwool would be delighted to engage with the Scottish Government in work on understanding the reasons why there is a difference between designed and as-built performance and what actions can be taken to close the gap.

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

Pilot schemes supported and promoted by the Scottish Government would help raise awareness of new and innovative methods of construction and the benefits these could bring in terms of site efficiencies, speed and quality of construction and delivered performance.

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?

Subsidies available to encourage building homes to high standards of performance should be targeted at using passive measures which will lock in energy efficiency for the lifetime of the buildings before measures that will require maintenance and replacement over time.

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

Incentive schemes such as the ASHP and high standards of performance specified in Building Regulations following a Fabric First approach in accordance with the Trias Energetica concept

<http://www.eurima.org/energy-efficiency-in-buildings/trias-energetica>) would encourage the use of innovative methods of construction. There can be a reluctance to adopt innovative material and techniques but incentives to developers to pilot new methods (such as the grants available under ASHP) where appropriate certification for materials and systems (e.g. CE marking where a harmonised standard exists or certification against an ETA) has been secured could showcase innovative materials and techniques in use.

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

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

Clarity of policy direction and creation of a robust training and accreditation framework will give organisations the confidence to invest in skills and training for their employees. This could be supported by seed funding for early adopters and seeking to draw in the funding made available by the UK Government for Green Deal installers to Scotland.

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 providers must engage with Trade Bodies representing SME organisations in construction to promote the availability of funding and support and to develop the skills and training courses to meet current and future needs. The Scottish Government should play an oversight role to ensure that the training courses developed are robust and challenging enough to deliver the highly skilled operatives needed to carry out high quality energy efficiency refurbishments and high performance new homes.

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