

**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

Vision and objectives are appropriate. A long term strategy like this is required to help ensure improvement in the existing housing stock. In addition to this people who live in homes require the support and knowledge to enable them to make improvements to their housing, and energy efficiency.

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

Cost – financial impact and initial outlays in installing measures  
Lack of knowledge/awareness/education about fuel bill savings and how much they would save over what period of time and if it's worth it for them.  
Unsure about the benefits  
Lack of knowledge about grants or assistance available  
For landlords – may not see how it benefits them... tenants get the savings  
Complicated criteria with grants and assistance – i.e. what's in and what's not?  
Mixed tenure –blockers  
Sometimes seen as stress/hassle e.g. clearing lofts etc  
Concerns about quality of workmanship when making improvements

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

Publicise any good quality information and advice services available – e.g. ESSac, or Council services  
Marketing and promotion – case studies, good news stories  
Joined up approach between organisations and council services e.g. by partnerships with care and repair or energy advice services locally led and delivered the right support for vulnerable households can be delivered.  
Financial incentives such as feed in tariff and council tax rebate scheme etc  
Government need to source and identify innovative funding and opportunities – need to support organisations to understand any complex funding models and who are able to maximise any funding available  
More area based schemes so the approach fits local requirements  
The green deal may help with a “whole house” approach, rather than doing bit by bit but significant financial restraints for householders.  
more focus and funding on hard to treat homes – although the GD is geared towards this we are still considering to what extent this could be achieved.

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

Need excellent quality of information and advice to be provided from one coherent source that is consistent and joined up with other organisations etc.

More investment in the Energy Saving Trusts role

Need a good information base, need to invest more in collecting information on the efficiency of homes, perhaps Home Energy Checks need to be more accurate and more in depth. Using EPC data.

For more hard to treat homes we need to build on and improve our knowledge, skills, awareness and expertise in this area – this would be done through training, experience and sharing of knowledge etc.

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

Lack of local contractors with the skills and knowledge – need to improve local supply chains.

A lot of rural properties are off gas, and therefore there is a lack of heating choices available,

many homes in rural area are also hard to treat homes i.e. walled stone or brick properties, coomb ceiling etc and have not benefited from the recent insulation campaigns – loft/CW insulations are restrained by coombs.

Some contractors (the bigger ones) sometimes struggle to deliver in remote rural areas and overcome the challenges that these present.

5. (b) How should these be addressed?

Ensure appropriate training for installers and surveys

Ensure appropriate information and advice – share this knowledge for better partnership working and consistent messages to people.

The Government needs to help support integrated, good, local advice provision using partnerships with Local Authorities and other agencies such as the Energy Saving Trust – community groups should also be able to play a key role.

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?

The Universal Home Insulation Scheme is an example of something that has worked well. It was local and area based and we agree its success should be built on in the national retrofit programme.

Local Authorities are key to delivery and ensuring it fits local needs and in engaging local communities and householders – however looking at the Green Deal there is the requirement for delivery partners. This is a potential role for local authorities, however we strongly believe that there has to be a large number involved to achieve the economies of scale and initial funding required. The initial process would also be very complicated and resource heavy

Delivery is more likely to be sustainable and achievable if its on a regional or national level.

Groups of authorities working collaboratively would be a good model of delivery particularly in terms of the supply chain. A regional model would likely also give the flexibility to tailor local solutions and approaches. Local Authority leadership and branding would generally enhance the delivery of any scheme, but the LA would have to have confidence in the model.

In the current climate the risk to the Local Authority has to be minimised as far as possible. Other issues is that on regional scales potentially competing local priorities and approaches would need to be managed well and the delivery model flexible enough to accommodate this.

Any retrofit programmes would have to align and link with Local Housing Strategy or any other Local Authority programmes/projects.

Although the benefits of being part of the delivery model are recognised, there is an acute awareness by the Council that too much involvement could also be considered a big risk, particularly a financial risk. As a local authority we would likely prefer to input into the delivery model, help shape/design it and tailor it as appropriate, rather than be directly involved in its delivery.

As a stock transfer authority we would also highlight that we would potentially lack the knowledge, skills, staff and resources to deliver/support retrofits in comparison with other authorities- who may, for example, already lead and have experience procuring heating systems and renewable products etc. This is why a partnership approach or a national approach would be more beneficial as it would share the knowledge and expertise and remove the Local Authority from being exposed to too much risk.

There are parts of the Council and Services which would expect to work closely with any retrofit programme and delivery model – potentially private sector enforcement – where we could perhaps introduce particular standard in the private sector for Landlords, Home Energy Advice Services, Planning and Economic Development, other advice services in the authority, the Care and repair service etc. Local authorities could also help engage community groups, making the most of their knowledge and consulting with them.

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

Support joined up working

Provide significant support and guidance

Better link fuel poverty and implications to health etc with other partners and the NHS. NHS resources should be used to help identify vulnerable households. This is done often on a local level for example through the Scottish Borders Home Energy Advice Service – and we agree with our partners that the importance of this kind of approach and the impact the input of NHS services have in identifying vulnerable clients should not be underestimated and should be reflected in national strategies.

SG should explore the possibility of delivering on a national scale – although it's acknowledged that this approach may not allow for the most

competitive pricing, but it would achieve the economies of scale – it should be explored at least.

SG need to be more proactive in helping to collate information in relation to fuel poverty. Fuel Poverty mapping should be done on a national level – with detailed local statistics and information. This would be very helpful to local authorities in order to identify priorities and take action. It has been a significant restraint in the past and this is an excellent opportunity to rectify this. It would help inform any funding applications as well as monitor achievements and progress in improving housing standards and energy efficiency of homes.

The Scottish Government should provide as much funding as it can to support Local authorities and other organisations.

Providing support to any local/regional programmes

Coordinate engagement

Coordinate the sharing of good practice – share knowledge – guide local authorities and organisations in what works and what doesn't – share best practice, publishing relevant material and information about schemes.

Help engage householders and consumers, help convey the messages that consumers need and to educate them

Assist with branding projects – showing SG backing and involvement

Evaluate and monitor achievements and progress

Look at planning policies where/if there are areas that block measures which improve the energy efficiency and standard of a home

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

Unsure

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

Lack of funding and resources will make it hard for all to achieve national fuel poverty and climate change targets

More incentives for landlords

Needs to be easier for less wealthy people to adapt their properties – requires some capital investment from owners.. unless there are more grants and incentives

More information and data

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)?

Effective engagement and publicising

Community engagement and involvement

Increased support and assistance targeted at vulnerable groups – increased skills for staff doing this.

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?

**Possibly** yes, but only with the level of support and assistance so that this enforcement is not detrimental to homeowners and landlords – various ways this could be enforced but I would suggest a light touch and a mindfulness of the resource constraints of the local authorities.

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

In principle this would help achieve required standards, in reality there are no resources for this. We would be reluctant to support this.

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

No comment

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

In theory a good but resources would be significantly tested to monitor and potentially enforce the five year maintenance plan

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

In principle if this is possible then yes, however there are procedures in place and it is difficult to see how this process could be streamlined without adversely affecting the owners or the council.

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

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 – unsure why they currently can't

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

No comment – not an issue in the Scottish Borders

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

As mentioned previously support, publicity, robust and coordinated information and advice, incentives, financial assistance, PR is important.

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

Possibly, if these weren't too onerous and were basic and achievable and there was plenty scope for exemptions

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

no comment – but would mention EPC's are a great source of information and this should be utilised to its full potential.

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

Educating people – PR etc they need to understand why they are being asked to do this and how it benefits them  
Understand people will require significant amounts of support and assistance in this area  
Help people have confidence in this, and any installers, workmen they are engaging with, and that they too have the skills and knowledge.

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

Try to use incentives first before considering regulation – a significant awareness raising exercise would have to come with any regulation

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?

no 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

If its not financially detrimental to the consumer

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

Its good if tenants can find the same quality of house in the private sector as in social.. but again we would be wary of any enforcement and regulation in the private sector and LA ability in terms of resources and skills to support this

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?



Requires high level of support and assistance, need to minimise disruption for people i.e. work being carried out in home, need to be sure confident in having strangers in their home i.e. assessors, installers etc. It is good to have someone like a LA Home Energy Advisor to be able to provide extra support in these instances, as vulnerable people may be more likely to trust a local authority contact. However LA resources to provide such a service is minimal. You may want to consider exemptions for vulnerable groups, although at the same time these are the groups who are more likely to be in fuel poverty and we need to do as much as we can to help them achieve warm and energy efficient homes with lower fuel costs. They may also require support and educating in how to manage their heating systems to achieve the best outcome for them after the installation or adoption of specific measures, so there may be some aftercare required, with advice and information.

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

Yes  No

As mentioned previously any regulation or compulsory standards would have to be looked at carefully

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

Maybe all at once to avoid any manipulation of the system..?

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

No comments – issues mentioned previously

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

No comment

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?

fuel poverty target of 2016..., IF regulations were in place it might be beneficial to introduce in 2015, but even then timescales would be very tight, - unsure better to look at CO2 targets of 2020 and 2050... regulations in 2016/17 potentially

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?

Suggested previously

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?

Training/skills/knowledge/info sharing/ understanding/ education

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?

No comment

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?

Mentioned previously

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

No comment

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?

No comment

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

No comment

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?

No comment

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

No comment

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?

Knowledge/skills/training

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

Need money- funding – financial resources – education, engage with colleges etc

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?

Coordination, partnerships, consistency

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.

Lack of local supply chains, distance to training facilities, financial impact for trainees - need to engage with partners and organisations, get the right facilities in place, encourage local supply and support this to ensure its sustainable.