

**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 checked="" 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 RIAS support the overall aims of the proposals contained in the consultation document. In developing a national retrofit programme the RIAS believe that in addition to the investment opportunities identified it is essential to look further at the trigger points where improvements to dwellings become cost effective, as we discuss below.

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

Cost and disruption.

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

Domestic energy efficiency measures fall into roughly 3 broad categories:

1. Non-disruptive cost effective measures with a relatively short payback, such as loft and cavity wall insulation, which have been well supported by the Scottish Government
2. Moderately disruptive, costlier measures with a medium payback period, such as window replacement
3. Very disruptive whole house improvements.

Of these three, current and proposed programs support the first. Existing regulations have a part to play in supporting the second, ie replacement windows required to meet the U-values in Section 6 of the Technical Standards. It is the third category where a significant proportion of energy reductions have to be made. Taken in isolation the total refurbishment of a dwelling simply to meet energy targets is not cost effective, however undertaken as part of a major refurbishment, as may happen on a 50 year cycle the extra over cost of transforming the energy efficiency of a dwelling has a medium payback period. Further regulation / incentives are required to ensure these trigger points are not missed.

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

Given the diverse housing stock and the multitude of energy efficiency measures available, not all of which can be applied in every case, it is important to underline the need for independent expert advice for home owners and landlords.

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 important to not conflate energy efficiency, CO<sub>2</sub> emissions and energy costs. There are no technical barriers to improving rural housing in the same way as detached suburban housing to make them energy efficient. However in the absence of mains gas rural properties are either reliant generally on more expensive higher emissions fuel sources or require additional investment to incorporate LZCT systems such as heat pumps and biomass boilers.

5. (b) How should these be addressed?

Firstly by separating out fabric and services efficiencies within funding and regulatory requirements. This ensures that a “fabric first” approach is adopted for all dwellings (not balanced in a whole house approach as can happen at present). Secondly provide additional support for off grid housing. This may be as simple as providing under pinning guarantees for new technologies, see Q 34.

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?

Every local authority has an established link to property owners and landlords, via the mechanism for collecting Council Tax, private landlords registration and RSLs. These links can be further utilised to deliver national policies and programmes.

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

An overall Scotland wide strategy is required to avoid patchy performance and distortions in the property market.

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

The RIAS does not wish to comment.

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

While the Scottish Government has a good understanding of the overall performance of dwellings (the macro view), historically the collection of detailed performance data dwelling by dwelling has been hard to collect (the micro view). Requirements such as SHQS returns and the central register of EPCs provide the opportunity to redress this. However in the case of EPC

data, the current processes and algorithms are fundamentally flawed as noted in the consultation. With the widespread introduction of BIM and cost effective survey techniques the RIAS urge consideration be given to a BIM based central register which provide much more detailed and usable information at a UPRN level.

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)?

Long term the cost effectiveness of energy efficiency improvements is compelling, however largely ineffective where home owners and tenants are unaware of them or lack the initial resources to put them in place or consider that they may not live in their current homes long enough to see the benefit. If the Scottish Government is to mandate energy efficiency requirements they must also support those who are least able to make them.

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?

Yes, but the infrastructure, in terms of a suitable central register is not yet in place.

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.

Items 3 and 4 should be reversed.

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 time, yes, once there is an adequate regulatory framework and central register in place.

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 further 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

No further 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

No further 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

No further 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

No further comments.

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

No further comments.

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

Government initiatives to ensure all properties have an accurate EPC, valid recommendations and smart meters all have a part to play.

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

Any measure to set minimum standards must be tempered by the recognition that there are some dwellings which due to their historic importance or their particular design or their low residual value cannot technically or cost effectively be improved. Historic dwellings therefore need special treatment in deciding what may or may not be appropriate. Dwellings with challenging designs or low residual values may need a more radical approach where investment is not made in advance of planned demolition.

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

rdSAP and SAP currently calculates the impact of occupants on energy use based on an average model which is unrepresentative of most household groups. The underpinning calculation could be run on the assumption of different household groups. Young couples, families and retired couple. Each calculation would give a different and more representative result for individual home owners to compare with their own energy bills.

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

Hard to treat dwellings will require considerable investment to make the worse performing the best performing and this investment can only be justified as part of a planned refurbishment triggered by a major renovation.

This requires a planned program over decades rather than years and should allow for the fact that some hard to treat dwellings have a limited future life. While it is possible for an RSL to manage their stock over such time frames, home owners generally cannot on an individual basis.

The RIAS would welcome the opportunity to be represented on the proposed working group.

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

Any regulation must be tempered with an understanding of both the specific dwelling and occupancy behaviour, as noted in the answers to Q21-23

above. Specifically while it is important for all dwellings to as energy efficient as possible for future owners or tenants, it may be that current owners or tenants already have intrinsically low energy requirements through careful management or sporadic occupancy.

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?

Given that by necessity energy efficiency standards must continue to be improved and that the methods for assessing energy performance will continue to improve in accuracy, the RIAS feels that option 1) of the four options is the most viable as it is the most clear cut in terms of a definitive improvement, the least interpretative and provides the clearest mechanism for enforcement.

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

No further comments

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

No further comments

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?

We would reiterate our comments to questions 23 and 24

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

Yes  No

The private rented sector generally has a quicker turnover of tenancies compared to the social rented sector or changes in ownership and therefore creating additional trigger points seems unnecessary.

Imposing requirements on home owners (other perhaps than when a group scheme is proposed for a block or tenement – which could be restricted to cavity / loft / external insulation) is draconian. The exception to this is where

the home owner is proposing to extend or alter to achieve more space or otherwise improve their home. As noted below it is reasonable to expect an investment in greater comfort or convenience to be accompanied by an improvement in performance. Where such changes are proposed in connection with an adaptation required to improve accessibility for those with restricted mobility etc, then further support funding should be made available.

With regard to potential improvements at the point of sale and with reference to our comments to question 3. The insistence at the point of sale of non and moderately disruptive improvements may act as a disincentive to those purchasers planning to undertake a major refurbishment and who might otherwise undertake very disruptive improvements which in themselves have a viable pay back.

Regulation could place the burden of improvement on new owners (the cost of which could be assessed prior to purchase) for implementation within in say 3 years, unless superseded by a warrant for alteration / extension etc inclusive of major upgrades.

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

Aside from the immediate cost effective measures, such as loft insulation, aspiring to make all Scottish homes a bit better and then a bit better again is not cost effective. Ensuring that when homes are refurbished, they are improved to a very high standard is very cost effective if viewed over the longer term and across all of Scotland's homes. The RIAS recognise that this approach is a major regulatory challenge.

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

The issues of enforcement are as complex as regulation. However if it becomes apparent that the lack of energy improvements and the burden on new owners of undertaking those improvements is reflected in the sale price of property this creates a driver to purchase and radically improve.

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 further 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?

Until the detail of the proposed regulation is available it is difficult to assess how long a lead in it is reasonable to provide for such significant cultural changes.

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?

There is a fear amongst some home owners that newer LZCT systems may not deliver the energy / cost savings promised due to either poor design, installation, changes in supportive funding or (in the case of biomass) lack of fuel supply. The Scottish Government could consider backing a new technology guarantee scheme which would provide home owners with a reassurance that should the worst happen they may obtain compensation. The RIAS suggest that this might be a much better use of any off set payments from the new build housing industry (as suggested by Scottish Homes) than it being used to displace other funding streams that are already or may be put into place.

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?

In valuation process took account of whole life costs over say a 50 year cycle then those properties which are well maintained and efficient will need less revenue spend than those which are not. Unfortunately home owner's assumptions are that rising property values means that revenue expenditure is relatively inexpensive when compared to mortgage interest / repayments and local taxes.

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?

A clear step towards greater energy efficiency and low emissions could be delivered by the introduction of district heating systems in urban areas, as are common on the continent but rare in the UK. However there are significant planning, management, technical and legislative impediments to this.

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?

The RIAS has long advocated a move towards a more environmentally responsible approach to the built environments. The RIAS was the first professional organisation to recognise those of its members with specialist skills in this area who leaders not only in Scotland but internationally.

The RIAS would welcome the opportunity to continue to work closely with the Scottish Government in delivering what are in fact complex and nuanced information to the construction industry and building owners.

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

The current suburban model of low density housing development though popular with purchasers (perhaps because alternatives are limited) is intrinsically less sustainable than well designed urban developments with a high concentration of bed spaces in a smaller geographical area, allowing for efficient services and transport as well as, commercial, retail, social and community facilities.

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?

The design and specification of new housing is led by a predominately risk adverse industry with little or no direct design training at boardroom level. It is unsurprising the uptake of innovative construction solutions has so far only occurred on a limited trial basis by the largest house builders, while the rest of the industry waits to see if the solutions might be applicable to them.

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

The Scottish Government has a major influence of the construction of affordable homes, where the history of innovation is much greater and this suggests greater support would be well placed.

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?

With reference to question 34 the provision of a safety net for those investing in innovative technologies and construction techniques would create much greater confidence.

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 rarely shifts common practice except in response to regulation or market expectations.

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?

No further comment

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

No further comment

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 further comment

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

No further comment

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 further 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.

No further comment