

**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 type="checkbox"/>
<b>Third sector/equality organisation</b>	<input checked="" 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

The vision and objectives do not reflect the importance of water-efficient homes both in reducing domestic energy use (through heating less water for use in showers and taps) and more widely in making homes sustainable. The vision reflects an Energy-Efficient Housing Strategy rather than a Sustainable Housing Strategy – and even in this context is not addressing the full potential of energy efficiency measures. Water efficiency needs to feature in both the Sustainable Housing Strategy and the National Retrofit Programme, as it reduces energy use and household bills. Hot water efficiency (showers and taps) is now included in the Green Deal.

Hot water efficiency measures (retrofitting of showers and taps, and advice on their use and on behaviour change) is essential in reducing in-home energy use. Water heating is the second largest use of energy in homes after space heating, before gadget use. Cold water efficiency (retrofitting of toilets) is also important because it reduces Scottish Water's energy use, as less water and wastewater is required to be treated.

Ministers set out the importance of water efficiency in energy use in the 2008 *Conserve and Save* consultation:

- *“Two aspects of water efficiency affect energy consumption: the energy used to produce drinking water and to treat it; and how much energy is used to heat the water we use in our homes and businesses”*
- *“As building standards for energy improve, the proportion of the energy used in new homes to heat water is much higher. It also grows as standards improve, compared to existing homes”*

In the final *Conserve and Save* strategy, published in 2010, Ministers built on this:

*“Energy is used in purifying water, heating water and treating waste water. therefore, it is important that water efficiency is integrated to capture all aspects of energy consumption”*

In that document, Ministers committed to considering the impact of introducing water efficiency measures into the building regulations in 2013.

Hot water use accounts for 8% of Scotland's energy use, and Scottish Water is the biggest energy consumer in Scotland, representing 2% of electricity demand. Waterwise estimates that if all UK homes reduced their hot water use by 5%, this would save one and a half times the CO<sub>2</sub> of all homes in Edinburgh. In *Conserve and Save* (2010), Ministers estimated that *“if every household in Scotland turned down its thermostat by one degree,*

*this could save up to 10% emissions from space and water heating in the domestic sector”.*

To address this issue, we propose the following amendments to the vision and objectives:

Vision

Add

- *Ensure homes are genuinely sustainable and use all possible measures to reduce carbon emissions through targeting water wastage*

Objectives

Amend

- A national retrofit programme to tackle fuel poverty, ensure we meet the climate change milestones set for housing, *ensure homes are not wasting energy or water* and enable Scottish households and businesses to get maximum benefit from energy company and other investment.
- Standards - to consider the role that regulation could play, alongside incentives, in driving uptake of energy efficiency *and water efficiency* measures.
- Financial market transformation to create long-term change in perception among surveyors, lenders and consumers of the real value of low carbon, *sustainable* [DELETE: energy efficient] homes - in order to drive the market.

We make more detailed suggestions below.

In addition, we believe that more work is needed on engagement with customers – this strategy concentrates on the fabric of the buildings, but information and advice on behaviour change is equally important in delivering both energy-efficient and sustainable homes.

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

Comments

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

Comments

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

Comments

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

Comments

5. (b) How should these be addressed?

Comments

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 potential Green Deal delivery models set out in the strategy include Green Deal partnerships. Waterwise and the Energy Saving Trust will shortly be producing a Green Deal Guidance document for water companies and Green Deal providers on how to design an efficient and effective Green Deal partnership which includes water efficiency (taps and showers are now included in the Green Deal List of Measures).

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

As a minimum it should set the framework and standards. This should include both hot and cold water efficiency – showers, taps and toilets.

The RPP1 milestones set out at 1.13 should have the following additional milestone included:

*Every home to have their showers, taps and toilets retrofitted where this will mean wasting less water*

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?

Comments

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)?

Social housing, which often does not include showers, should be required to install them. This would save water and energy and provide a tangible

comfort benefit.

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?

Comments

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

In the context of including water efficiency in the drive to make existing private homes sustainable (the need for which we set out elsewhere in this response), the most effective combination of measures would be product standards with maximum flow and flush rates on showers, taps and toilets (and potentially dishwashers and washing machines), which would influence at point of sale, and the inclusion of water efficiency retrofitting (of showers, taps and toilets) in the National Retrofit Programme.

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

Comments

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

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

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?

Comments

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

Yes  No

Point of refurbishment – via product standards on maximum flow and flush rates for showers, taps and toilets.

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?



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?

We fully support the drive to reflect the sustainability of housing in house prices, including through support for green mortgages.

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?

Ministers have committed to considering the impact of introducing water efficiency measures into the building regulations in 2013. To maximise energy efficiency, and to make homes genuinely sustainable, it is important that water efficiency (showers, taps and toilets) be included in any regulations and standards on new build.

New homes should also be required to be fitted with water meters, to help drive sustainable use of water.

The specific objectives for new build transformation set out at 4.9 should include water use and efficiency, in the first bullet concerning energy use in homes, and in the second concerning energy use in construction.

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?

Comments

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?

It has not addressed the importance of skills to retrofit water-using devices in homes to make them more water-efficient, and of advising customers on their use and on behaviour change. Waterwise will shortly launch a new Qualification and Training programme covering both of these, at two levels, compatible with the Green Deal and accredited by a mainstream body. Please contact Waterwise for details of how this could be linked in with the training programmes mentioned in the chapter. It would help deliver the potential referred to at 5.5 to *"install energy efficiency with repair or improvement works as a package for the consumer"*.

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

All four of the examples of opportunities on offer set out at 5.2 should include water – new build, retrofitting existing homes, working with traditional buildings and standards.

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.

Comments