

CONSULTATION QUESTIONS

Section 1

Q1) Do you think the Home Report is meeting its original objectives?

Yes No

Q1a) If yes, please explain why

Our predecessor organisations, the Scottish Consumer Council and Consumer Focus Scotland, were closely involved in the development of the Home Report in Scotland. At this time, we outlined our support for the reports which represented a consumer-focused solution to reducing the risks and stress of one of the biggest decisions anyone ever makes.

Consumer Futures no longer works in areas relating to the general economy, however we are the statutory consumer body for energy. Therefore, the rest of our response focuses solely to the energy element of the Home Report.

Q1b) If no, please explain why

Comments

Q2) Are the original Home Report objectives still appropriate?

Yes No

Q2a) If yes, please explain why

Q2b) If no, please explain why

The landscape has changed since the Home Report was introduced. As noted in the consultation document, the Sustainable Housing Strategy's (SHS) aims, along with those of the Climate Change Act 2009, and the Scottish Government's fuel poverty targets, are also relevant to the design of the home report.

We agree with the ExHA recommendation, that reductions in energy use, carbon emissions and running costs should be included as objectives and the policy evaluated accordingly (i.e. assessed on its impact upon behaviour and particularly investment decisions).

The Sustainable Housing Strategy also contains an objective on market transformation. The Scottish Government is currently giving consideration to how this can be achieved, and we would urge that this continue to be a priority. We echo the response made by the ExHA that market transformation is also built in as an objective for the home report so that energy performance is more effectively reflected in the housing market.

Q3) Should the Home Report play a more central role in promoting energy efficiency and property condition improvements among home owners?

Yes No

Q3a) If yes, please explain why

Yes. The Home Report has a crucial role to play in helping the Scottish Government achieve its ambitious climate change and fuel poverty targets.

The Scottish Government has established a working group to develop a consultation on developing minimum standards for energy efficiency in private housing, of which Consumer Futures is a member. The work of this Group is at an early stage, however there is scope for the Home Report to become an increasingly important tool for consumers to learn about the energy efficiency of properties.

Consumer Futures has conducted research to examine how Energy Performance Certificates could be changed to act as a tool to empower consumers, when choosing energy efficiency measures or taking up improvements¹. The EPC forms an important part of the Energy Report, and there may be elements of this research which are useful when reviewing the effectiveness of the Home Report in relation to the promotion of energy efficiency.

The research findings suggest there is scope to improve the EPC, in terms of clarity, credibility and comparability. At a minimum, the research found that the report needs to inform consumers about the costs and benefits of a properties energy efficiency rating. It should also set out the potential for improvement and advise of any Green Deal charge associated with the property. Consumers should also be signposted to appropriate sources of information and advice, specifically, Home Energy Efficiency Programmes in Scotland (HEEPS).

Importantly, the research found that consumers do not understand CO₂ or kWh savings. The A-G rating system is useful, however this alone is not sufficient as consumers cannot translate it into monetary savings. Potential financial savings and costs can be made much clearer.

To ensure credibility the energy aspect of the report needs to provide accurate up to date information, so it is relevant to potential buyers. A clearer front page A-G rating that also displays the estimated energy bill, would allow consumer to make clearer comparisons.

Additionally, we know that buying a new home is a significant trigger point for home improvements, which could include energy efficiency measures such as insulation or double glazing. The Home Report can play a central

¹ <http://www.consumerfutures.org.uk/reports/as-easy-as-epc-consumer-views-on-the-content-and-format-of-the-energy-performance-certificate>

role in building consumers awareness of energy efficiency at that point in the sales process.

Q3b) If no, please explain why

Comments

Q4) Should a national register of Home Reports be established?

Yes No

Q4a) If yes, please explain why including who should have responsibility for development and maintenance

Comments

Q4b) If no, please explain why

Comments

Section 2

Q5) Do you think the upfront cost of Home Reports is preventing potential sellers from putting their property onto the market?

Yes No

Q5a) If yes, please provide details.

Comments

Q6) Are you aware of any schemes available (e.g. deferred payment) to help potential sellers to pay for home reports?

Yes No

Q6a) If yes, please provide details

Comments

Q7) Are there any issues with the majority of Home Reports being commissioned through selling agents?

Yes No

Q7a) If yes, please explain why

Comments

Q7b) If no, please explain why

Comments

Q8) Should other organisations be allowed to carry out the Single Survey (including valuation) and/or the Energy Report?

Yes No

Q8a) If yes, what other organisations and why

Comments

Q8b) If no, please explain why

Comments

Q9) In your experience is the requirement for a home report before marketing a property leading to delays in properties coming onto the market?

Yes No

Q9a) If yes, please outline the implications of this.

Comments

Q10) Are home reports a useful marketing tool for sellers?

Yes No

Q10a) If yes, please explain why

Comments

Q10b) If no, please explain why

Comments

Q11) Is the 12 week deadline for marketing a property after completion of a home report appropriate and reasonable?

Yes No

Q11a) If yes, please explain why

Comments

Q11b) If no, please explain why

Comments

Q12) Is the 28 day provision for removing a property from the market without requiring a new home report appropriate and reasonable?

Yes No

Q12a) If yes, please explain why

Comments

Q12b) If no, please explain why

Comments

Q13) Are there any issues with potential buyers accessing home reports?

Yes No

Q13a) If yes, please provide an overview and outline the implications of this

Comments

Q14) Is this the most appropriate way to enforce home report legislation?

Yes No

Q14a) If no, please explain why and how this could be improved

Comments

Q15) What are your views on mortgage lenders' acceptance of home report valuations?

Comments

Q16) Are the re-dress options available to buyers reasonable and appropriate?

Yes No

Q16a) If no, please explain why and how these could be improved

Comments

Q17) Do these exceptions need to be amended?

Yes No

Q17a) If yes, please explain what amendments are required and why

Comments

Section 3

Q18) Does the single survey element of the home report provide an appropriate and useful level of information?

Yes No

Q18a) If no, please explain why and what information should be removed and/or added

Comments

Q19) Should the repairs categories in the single survey be amended to make them consistent with the categories used in the Scottish House Conditions Survey?

Yes No

Q19a) If yes, please explain why

Comments

Q19b) If no, please explain why

Comments

Q20) Is the valuation element of the single survey a useful element of the home report? Yes No

Q20a) If yes, please explain why

Comments

Q20b) If no, please explain why

Comments

Q21) Is the information provided in the energy report appropriate and useful?

Yes No

Q21a) If yes, please explain why

Consumer Futures believes that the information provided in the energy report is appropriate and useful. However, as highlighted in our response to question 3, there is scope to considerably improve the energy report, to make it more meaningful to consumers.

Q21b) If no, please explain why

Comments

Q22) Is the information provided in the property questionnaire appropriate and useful? Yes No

Q22a) If yes, please explain why

Comments

Q22b) If no, please explain why

Comments

Q23) Should an additional question on land maintenance fees be added to the Property Questionnaire?

Yes No

Q23a) If yes, please explain why

Comments

Q23b) If no, please explain why

Comments