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Scotland's Sustainable Housing Strategy: Analysis of Responses to 'Homes That Don't Cost the Earth' Consultation



SCOTLAND'S SUSTAINABLE HOUSING STRATEGY: ANALYSIS OF RESPONSES TO 'HOMES THAT DON'T COST THE EARTH' CONSULTATION

Liz Shiel Associates

Report prepared by: Liz Shiel, Linda Sheridan, Valerie Strachan

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EXECUTIVE SUMMARY

Key findings

- A large majority of respondents (80%) supported the vision and objectives set out in Scotland's Sustainable Housing Strategy for warm, high quality, affordable, low carbon homes. There was more unqualified support for established and familiar approaches such as information programmes, incentives and area based approaches than for mandatory higher standards for existing housing.
- **National Retrofit Programme (NRP):** Several key representative bodies expressed strong support for the National Retrofit Programme. Many respondents indicated a desire to retain successful elements of recent energy efficiency programmes in the design of the NRP: both a 'universal' area-based programme and a demand-based programme for vulnerable households, delivered via Energy Saving Scotland advice centres, together with local authority leadership, on a partnership model.
- Grant levels would be critical, given that the principal challenges were effective solutions for hard-to-treat homes. Longer-term funding would increase the take up and efficiency of programmes. Some respondents advocated whole house solutions as representing better value than piecemeal measures.
- **The Role of Standards:** There was majority support for consideration of a minimum condition standard beyond the tolerable standard, with slightly less support for a minimum energy efficiency standard to apply to private sector housing. The latter was a key theme of the WWF campaign. However most responding organisations were concerned about the resourcing and practicalities of enforcement, and particularly in relation to a private sector energy efficiency standard, the potential impact on the owner occupied sector where conditions applied at the point of sale might further depress house sales.
- Many supported incentives such as rebates on council tax and Land and Buildings Transaction Tax, allied to promotion of a better appreciation of energy efficiency through information campaigns, improved guidance on technical solutions, and monitoring of the success of improvement programmes.
- **Financial market transformation and new build market transformation:** The current economic climate and state of the housing market, together with reduced levels of funding in local authorities and RSLs were seen as important contextual factors. The current state of the construction industry made it more difficult to contemplate innovation or indeed speculative investment in upskilling or training (see also following paragraph). Mortgage valuations reflect consumers' priorities and still do not reflect energy efficiency improvements. Both RSLs and house-builders need the security of long term funding programmes to develop cost effective planning and procurement in both new build and retrofit.
- **Skills and training:** Potential cuts in college provision would make it less likely that Scotland could both upskill its workforce and train sufficient entrants to take advantage of low carbon opportunities.
- A common theme of responses to many questions was the need for information and sharing of knowledge, to raise awareness of benefits, improve confidence in technologies, clarify funding routes and publicise other types of support.

Context

- 1 'Homes Fit for the 21st Century', the Scottish Government's housing strategy for the next decade, included a commitment to develop a sustainable housing strategy for Scotland bringing together policies on climate change, energy efficiency, fuel poverty, planning and the built environment. 'Homes that don't cost the earth' sets out a vision for sustainable housing with policies and actions on the five themes emerging from the Greener Homes Summit: a National Retrofit Programme (NRP); the role of standards; financial market transformation; new build market transformation; and skills and training.

Profile of responses

- 2 There were 91 non-campaign responses to the consultation, 89 from groups and 2 from individuals. A campaign by WWF Scotland generated 358 responses, of which 21 varied substantially from the standard text and 37 included minor variations. One response was excluded as defamatory. Non-campaign responses were categorised as: the local authority sector; the RSL sector; the private sector; professionals; other group respondents; and individuals. There were 48 questions, some in two parts. Closed questions with a yes/no response were analysed quantitatively. The main focus of the analysis was qualitative, reflecting comments on both closed and open questions. An analytical framework was based on an initial review of the key themes and issues for each question. Response rates were fairly high, with many over 60% and particularly high rates for the sections on the National Retrofit Programme and the Role of Standards.

Results of the consultation

- 3 The majority of respondents (80%) supported the vision and objectives set out in Scotland's Sustainable Housing Strategy for warm, high quality, affordable, low carbon homes. Respondents raised a range of additional issues and commented on how the vision and objectives might best be achieved. Issues raised by respondents included a range of views on fuel poverty issues, on technical aspects of improvements to buildings, such as the need for good repair standards and appropriate ventilation, the scale of investment and funding needed at a time of limited resources and economic difficulties, the potential for adverse impact on the housing market if higher standards were enforced, and concerns about the likely effectiveness of the Green Deal and Energy Company Obligation (ECO), particularly for rural homes. (Q1)

A National Retrofit Programme

- 4 Several representative bodies volunteered broad support for the National Retrofit Programme (NRP). Respondents identified many barriers to home owners and landlords installing energy efficiency measures: costs and financing; consumer perceptions and behaviour; the 'hassle' involved in having work done, either as occupant or landlord; inadequate information; questionable benefits of measures or fears of technical problems; the physical nature of the stock; building condition issues; energy supply problems in areas off the gas grid; the confusing range of offers for energy efficiency

improvements; the difficulties of improving mixed tenure blocks and common parts of buildings; uncertainties about advisors and contractors; the lack of incentives for private landlords with poor returns on investment in energy efficiency improvements; and limitations imposed in conservation areas and listed buildings. (Q2)

- 5 Various solutions were advocated including measures that the Scottish Government might undertake: continued support for the Energy Saving Scotland advice centres (ESSacs); financial incentives including council tax and LBTT rebates; grant support for vulnerable households; area-based improvement programmes to be led by local authorities over a number of years; promotional campaigns; and improved technical information and demonstration projects. Some questioned the viability of the Green Deal and ECO, including calls for a simpler funding model for Scottish retrofit and a simpler offer to consumers. There were particular concerns about traditional buildings and a need for guidance on hard-to-treat house types. Respondents suggested a range of measures for traditional construction types and the need for comprehensive advice to ensure that improvements achieve their objectives, such as ensuring adequate insulation before installing air source heat pumps. (Qs 3-4)
- 6 The key issues for improving energy efficiency in rural, remote or island areas were: the rural premium, with higher costs due to difficulties of access and low density; high energy costs in areas off the gas grid; the high proportion of hard-to-treat homes and the expense of solutions; and difficulties in accessing programmes of support, despite high rates of fuel poverty. Suggestions to address these issues included: additional funding, the design of schemes of support, business development support for local companies, technical guidance on solutions for hard-to-treat properties, and community energy generation. (Q5)
- 7 Almost all the local authority groups advocated a central role for local authorities in managing energy efficiency improvements across tenures, some suggesting a regional partnership, with a facilitating rather than delivery role. Few offered opinions on the funding options given in the consultation but there was concern about the challenge funding model. Only c.10% of respondents commented on the Homes for Scotland proposal for new build to contribute funding for the improvement of existing homes in lieu of higher building standards. (Q6)
- 8 The key role for Scottish Government was to maximise resources and provide funding for the National Retrofit Programme, including negotiation of Scotland's share of UK funding. It should also: set standards, design the programme, and take oversight of delivery; promote awareness and disseminate information about technical options, and support the collation of information to better identify need and track progress. Relatively few respondents commented on the role of devolution of additional powers; some identified tax powers and control of budgets as potentially most helpful to retrofit, particularly a reduced rate of Value Added Tax. (Qs 7-9)

- 9 Partnerships with trusted intermediaries such as health visitors, MacMillan nurses, community interest groups, WRVS, cultural groups, Age Scotland etc. were seen as key to ensuring that the NRP would maximise benefits to all consumers, including the most vulnerable. Funding was needed to support such intermediaries to promote the programme. Also, the local authority Care & Repair model could be expanded to cover Green Deal, and energy advice could be offered to single property private sector landlords. Access to independent surveyors, approved contractors, and handholding could allay the fears of vulnerable consumers. Clear communications were important and should include a public engagement campaign at community level. Vulnerable people should be prioritised within area-based schemes, and help should be extended to disabled people who were ineligible for Care and Repair. (Q10)

The role of standards

- 10 There was broad support (77%) for the Scottish Government to consider a mandatory condition standard, beyond the tolerable standard. However, many respondents, particularly the local authorities, were concerned about the practicalities of enforcement of such a standard, in addition to current requirements to enforce the tolerable standard and repairing standard. Enforcement in the owner occupied sector was likely to be problematic. Compliance for private rented housing might be linked to landlord registration. Some respondents were concerned about the possible impact on the supply of private rented housing and housing waiting lists. However, there was support for use of incentives at the point of sale, particularly a Land and Building Transaction Tax rebate related to a condition standard. (Q11)
- 11 There was strong support (70%) for the principle of a checklist for maintaining a quality home, with a range of suggestions for the content of the checklist and its wording. There was some uncertainty about how the checklist might be used. (Q12)
- 12 A majority (62%) supported the introduction of a local authority power to require owners to improve their properties, which had been suggested to support the achievement of the Scottish Housing Quality Standard (SHQS) in mixed tenure blocks and energy efficiency measures in common parts of buildings. There was cautious support from many, particularly RSLs, but objections from many of the local authorities, particularly about recovery of costs, available resources, and practicalities of enforcement. There was also concern about burdening low-income homeowners who may not be able to afford routine maintenance, let alone improvements. (Q13)
- 13 There was stronger support (73%) for a local authority power to enforce decisions taken by owners in multi-household blocks, albeit with concern about recovery of costs, and also for the optional power to issue maintenance orders on any property which has had a work notice (81%). There was also very strong support (87%) for streamlining the process for using maintenance orders, particularly amongst local authorities, and support (75%) for powers to issue work notices relating to amenity, safety, and security outwith Housing Renewal Areas (HRA), but it was thought they would be little used, given local authorities' lack of resources. There was strong support (82%) for powers to

issue repayment charges for work on commercial properties that would enable work to be undertaken in mixed-use premises, despite concerns that owners of unoccupied commercial premises often could not be traced. (Qs 14-18)

- 14 Given the recent introduction of the Property Factors (Scotland) Act 2011, it was not thought necessary to make it easier to dismiss and replace property factors. Many respondents identified the need to address the lack of factoring in many properties, which posed a significant issue for maintenance. (Q19)
- 15 Respondents suggested ways to raise the priority given by owners to energy efficiency, including the provision of information about running costs at point of sale or renting, and an energy efficiency awareness raising campaign. Many proposed incentives for consumers to make improvements or to purchase new low energy / low carbon homes, in particular discounted council tax (most frequently mentioned) and rebates on the forthcoming Land and Buildings Transaction Tax. (Q20)
- 16 Opinion was divided about the introduction of minimum energy efficiency standards for private sector housing, although the majority (57%) supported them: many respondents expressed concerns about the potential impact on the housing market, about the practicalities of enforcement and the potential impact on hard-to-treat and rural properties. A common response was that incentives and promotional campaigns were preferred to regulation and that regulation should only be introduced if they fail. (Q21)
- 17 Just over half suggested improvements to Energy Performance Certificates (EPC), particularly the inclusion of likely running costs. Some suggested ways to raise the profile of EPCs. There was also some general criticism of EPCs and RdSAP (the Reduced data Standard Assessment Procedure, see glossary). It would appear however that most of the issues raised were covered by the revised EPC recommendations report, issued in October 2012, and requirements for the use of EPC ratings in property advertising, from January 2013. (Qs 22-24)
- 18 The option of using EPC ratings as the basis for an energy efficiency standard attracted most support, because it offered consistency with the format of standard proposed for the Energy Efficiency Standard for Social Housing, and thus for the application of the same standards across the social and private sectors. However, there was concern about the higher costs of achieving the standard in rural areas and, more generally, the potential impact on housing costs without increased recognised value. Advice on diversity issues was similar to that given in the NRP section. (Qs 25-28)
- 19 The trigger points for application of the standard most often suggested in addition to point of sale or rental were applications for building warrant or major building work, landlord registration, HMO licence application, and re-issue of EPCs. However a quarter of respondents thought that requirements should only be triggered at points of sale or rental, or disagreed with regulation. (Q29)

- 20 While 57% favoured an energy efficiency standard in the private sector, a larger majority of respondents (65%) supported sanctions on owners, although with many comments urging caution about the impact on the market and enforcement issues. A minority (46%) supported the sanction or obligation being passed on to buyers. Although 2015 was the date most often suggested for the timing of regulation, many more commended a cautious approach, taking account of progress with programmes soon to be introduced and the current economic climate. (Qs 30-33)

Financial market transformation

- 21 This section of the consultation explored the ability of the market to reflect and value energy efficiency. Respondents - particularly the mortgage lenders - discussed why the market may not reflect energy efficiency. Others argued that better information about the true costs and benefits of energy efficient homes and improved training for surveyors and lenders were key to ensuring that the market places an appropriate value on energy efficiency.
- 22 With regard to levers to support the achievement of the strategy, there was wide-ranging support for the variation of council tax and Land and Building Transaction Tax to reward energy efficiency, but concerns about various aspects of the Green Deal and doubts about equity release products. Concerns were expressed about impacts on the current fragile housing market. (Qs 34-37)

New build market transformation

- 23 The creation of sustainable neighbourhoods could be supported by the use of specialist multi-disciplinary teams and project managers, appropriate locations, on site renewable energy generation including microgeneration, excellent public transport linkages to avoid dependence on the private car, access to amenities, and long term management. Planning guidance and building standards were seen as having an important role. (Q38)
- 24 The consultation asked about challenges to new build transformation and possible solutions. Respondents identified issues including some uncertainties about the true additional cost of sustainability; the need for support for research and development (R&D); the threat to climate change goals posed by suggestions that higher building standards should be deferred; and the risk that poor workmanship would undermine the achievement of sustainability in the built product. (Q39)
- 25 Bringing innovative construction methods to market would require proof that products were sound and would hold their value. Respondents advocated life cycle analysis and proof of product demonstration projects, and the exchange of knowledge about completed projects in the UK and overseas; research and product accreditation, incentives to use modern methods of construction; regulatory standards; and property assurance schemes for new products. (Q40)
- 26 Many argued that if the Affordable Housing Supply Programme (AHSP) were to champion greener construction and technologies, increased funding would

be needed to achieve higher standards of sustainability, particularly in rural areas, and longer term programming. (Q41)

- 27 Some counselled that in the current economic climate, only regulation could influence builders to make greater use of innovative methods. There were calls for a centre of excellence to work with industry in Scotland, whilst the Council for Mortgage Lenders advised on the needs for recognised standards and warranties to give confidence to lenders about modern methods of construction (MMC). (Q42)

Skills and training

- 28 Less than half the respondents answered the section on skills and training. Many commented on the impact of the recession, loss of skills and capacity, and the need for investment to create demand and rebuild the skill base. There were already skills and capacity issues for many of the newer green technologies. The greatest challenge for both retrofit and new build was to fund the re-skilling and up-skilling of existing workers, from design through to build, as well as supporting new entrants in the 16-19 year old age group through Modern Apprenticeship programmes. There was considerable concern about reduced capacity in colleges, compounded by the regionalisation agenda in the post-16 review of vocational education. (Q43)
- 29 Firms need to understand which retrofit solutions would be accepted by Green Deal providers in order to know which products and systems to be trained in. There was a need for skills development in customer service and project planning, as well as trade skills. (Q44)
- 30 Several commented that industry was fully aware of training opportunities but because of market pressures which threaten the survival of businesses in the industry, staff were not offered the time they need away from revenue earning work to take up learning opportunities. (Q45)
- 31 Some respondents called for a culture change in the industry. Suggestions for ways to widen participation were focussed on Community Benefits in Public Procurement and initiatives led by local authorities with private and voluntary sector partners to increase the number of jobs, education, or training opportunities available to young people and equalities groups. (Qs 46,47)
- 32 A minority commented on the challenges to skills and training in remote and island areas. They proposed measures to boost access to training and secure employment – stimulating consumer demand to create predictable workloads, contracting local businesses, and different training modes including distance learning which would require suitable broadband access. Subsidy could allow rural learners to attend college for intensive training packages. (Q48)

INTRODUCTION

- 1 This report summarises the responses to the 14 week consultation on 'Homes that don't cost the earth,' undertaken as a stage in the development of the Sustainable Housing Strategy (SHS). The consultation sought views from a wide range of stakeholders, including local authority, housing association, private business, and third sector groups as well as individuals.

Background to the consultation

- 2 'Homes Fit for the 21st Century', the Scottish Government's housing strategy for the next decade, includes a commitment to develop a sustainable housing strategy for Scotland bringing together policies on climate change, energy efficiency, fuel poverty, planning and the built environment. 'Homes that don't cost the earth' also reflects the commitments of the Energy Efficiency Action Plan under the Climate Change (Scotland) Act 2009, the Low Carbon Economic Strategy, and the Scottish Fuel Poverty Statement.
- 3 'Homes that don't cost the earth' sets out a vision for sustainable housing and policies and actions on the five themes emerging from the Greener Homes Summit, seeking opinions on the following:
 - vision and objectives for the Sustainable Housing Strategy;
 - a National Retrofit Programme (NRP);
 - the role of standards;
 - financial market transformation;
 - new build market transformation; and
 - skills and training.

Consultation process

- 4 The consultation document was developed with the Sustainable Housing Strategy Group, whose members include leading housing, fuel poverty, environmental and consumer interests. The development process included meetings and a workshop as well as discussion of an early draft of the consultation document.
- 5 'Homes that don't cost the earth' was published on 25 June 2012, together with an on-line questionnaire prefixed by a Respondent Information Form. The 14-week consultation closed on 28 September, with a few extensions given until 5 October. Officials invited a number of organisations to respond as well as issuing the general invitation online. The consultation was supported by a number of events attended by Scottish Government policy officials.

Methodology

Respective roles of LSA and Scottish Government

- 6 Scottish Government required an independent analysis of the consultation responses and Liz Shiel Associates (LSA) was commissioned to do this work. Scottish Government officials have advised on factual issues relating to the consultation and the consultation process. The consultation document was published on the Scottish Government website. A link to the consultation was circulated by email to a wide range of organisations and groups. Respondents were invited to use a standard questionnaire available on-line. All responses were given a unique number and passed to LSA for processing, including those where the respondent had requested that their response should not be published: LSA's copies have since been deleted.
- 7 Both SG officials and LSA checked responses generated by the WWF campaign for any variations from the exemplar text published online. LSA checked the content of responses with variations and if there were substantial variations, reserved them for individual analysis.
- 8 A simplified categorisation of non-campaign respondent types is used in this study. The groupings are: **RSL sector** (RSLs and their representative organisations); **local authority sector** (local authorities and their representative organisations); **private sector** (businesses and their representative organisations); **professional** (representative bodies for professionals); **'other' groups** (third sector, building related organisations, an NDPB, public sector bodies, and multi-disciplinary networks), and **individuals**. Table A in Annex A summarises the declared respondent categories and the simplified categories, while Table B details the allocation of organisations to the simplified respondent categories.

Analysis of non-campaign responses

- 9 The consultation questions comprised: closed questions with a Yes/No response, mostly plus an invitation to comment, and open questions. Each questionnaire was checked for which questions had been answered. Open questions were recorded as Comment or Nil response. The questionnaire had a tick box for the closed questions. Where this was not used but comments given, we did not input a value for the closed question to avoid the risk of misinterpretation. For closed questions we recorded: Yes, Yes + comment, No, No + comment, Comment only, or Nil response. This is compressed in the summary tables to Yes, No, Comment only, and Nil response. Where respondents did not use the questionnaire, a statement that related directly to a question was recorded as Comment only, otherwise as Nil response. Quantitative analysis tables for each question are presented in Annex B. In a few instances, as noted in the text, comments under one question were more relevant to another and they are discussed under the appropriate question.
- 10 The main focus of the analysis was qualitative, concerned with understanding the full range of respondents' views. LSA used an initial review of responses

to develop an analytical framework for each question, which identified key themes and issues. Each questionnaire was checked against the earlier recording of responses, then the comments were pasted into the framework. The framework was modified where new themes or key issues emerged as the analysis progressed. LSA then reviewed all the comments, organised by the key themes, to write the analysis of responses to each question. Where respondents gave information about current good practice, studies or publications pertinent to the strategy, references are presented in Annex C.

Analysis of campaign responses

- 11 The standard text of the WWF campaign is shown in full at Annex D. None of the campaign responses adopted the questionnaire format or directly answered the consultation questions. However, the content of the standard text and of the responses with substantial variations is noted at relevant points.

Structure of this report

- 12 Chapters 1 to 5 contain the question by question analysis of the consultation responses, structured similarly to the consultation chapters. The annexes contain a list of respondents, tables relating the respondent category to the responses, examples of current good practice, the text of campaign responses, and a glossary.

Profile of responses

- 13 There were 91 non-campaign responses to the consultation, 89 from groups and 2 from individuals. The distribution of responses by simplified categories is shown in Table 1.
- 14 Amongst the group responses, Homes for Scotland noted that it represents the home-building sector in Scotland and had discussed the draft strategy with members. There was only one response from an individual house-builder. The Scottish Federation of Housing Associations (SFHA) response notes it reflects opinion gathered during consultation events with members. None of the other representative bodies commented on how they had compiled their responses.
- 15 The Existing Homes Alliance Scotland response was endorsed by another respondent, the Chartered Institute of Housing. There were considerable similarities between the Existing Homes Alliance, Consumer Focus Scotland, Age Scotland, and WWF responses. The responses by Strathclyde Fire and Rescue Services and the Chief Fire Officers Association Scotland were similar to each other.

Table 1: Respondents, by simplified categories

| RSL sector | Local authority sector | Private sector | Professional | 'Other' groups | Individual | ALL |
|------------|------------------------|----------------|--------------|----------------|------------|------------|
| 20 22% | 26 29% | 16 18% | 6 7% | 21 23% | 2 2% | 91 100% |

- 16 A WWF Scotland campaign generated 358 responses, of which 21 varied substantially from the standard text and 37 included minor variations. One response was defamatory and not further considered.
- 17 Not all respondents responded to each question. Some respondents did not answer a closed 'Yes/No' question but did offer a comment. Where this occurred, the total number of respondents is noted as well as the numbers answering 'Yes/No'. Response rates for each question are shown for the simplified respondent categories. Table 2 shows the level of response to each question and the average level of response for each section.
- 18 Response rates were fairly high, with many over 60% and particularly high rates for the sections on the National Retrofit Programme and the role of standards. Response rates were less than 50% for Q8 concerning the devolution of additional powers, Q16 about the maintenance order process and most of the skills and training section.

Table 2: Summary of consultation response, by section and by question

| Total respondents N =91 | | | | | | | | |
|--------------------------------------|-----------|------------|------------------------------|----------|-----|--|-----------|------------|
| Section, question | Response | | Section, question | Response | | Section, question | Response | |
| | No. | % | | No. | % | | No. | % |
| Background | | | The role of standards | | | Financial market transformation | | |
| 1 | 83 | 91% | 11a) | 70 | 77% | 34a) | 55 | 60% |
| A National Retrofit Programme | | | 11b) | 74 | 81% | 34b) | 55 | 60% |
| 2 | 77 | 85% | 12a) | 69 | 76% | 35 | 51 | 56% |
| 3 | 77 | 85% | 12b) | 57 | 63% | 36 | 55 | 60% |
| 4 | 79 | 87% | 13 | 74 | 81% | 37a) | 60 | 66% |
| 5a) | 64 | 70% | 14 | 66 | 73% | 37b) | 61 | 67% |
| 5b) | 64 | 70% | 15 | 57 | 63% | average: | 56 | 62% |
| 6 | 79 | 87% | 16 | 45 | 49% | New build market transformation | | |
| 7 | 78 | 86% | 17 | 53 | 58% | 38 | 62 | 68% |
| 8 | 43 | 47% | 18 | 56 | 62% | 39 | 54 | 59% |
| 9 | 69 | 76% | 19 | 48 | 53% | 40 | 58 | 64% |
| 10 | 71 | 78% | 20 | 72 | 79% | 41 | 54 | 59% |
| average: | 70 | 77% | 21 | 79 | 87% | 42 | 55 | 60% |
| | | | 22 | 66 | 73% | average: | 57 | 62% |
| | | | Skills and training | | | | | |
| | | | 23 | 63 | 69% | 43a) | 55 | 60% |
| | | | 24 | 61 | 67% | 43b) | 40 | 44% |
| | | | 25 | 61 | 67% | 44 | 52 | 57% |
| | | | 26 | 74 | 81% | 45 | 42 | 46% |
| | | | 27 | 69 | 76% | 46 | 44 | 48% |
| | | | 28 | 58 | 64% | 47 | 31 | 34% |
| | | | 29 | 66 | 73% | 48 | 29 | 32% |
| | | | 30 | 69 | 76% | average: | 42 | 46% |
| | | | 31 | 53 | 58% | | | |
| | | | 32a) | 60 | 66% | | | |
| | | | 32b) | 63 | 69% | | | |
| | | | 33 | 62 | 68% | | | |
| average : | 63 | 70% | | | | | | |

1 ANALYSIS OF RESPONSES: VISION

1.1 Question 1 seeks guidance on the vision and objectives for the Sustainable Housing Strategy:

Q1 Are the vision and objectives as set out in sections 19 and 20 appropriate for Scotland's Sustainable Housing Strategy?

1.2 Almost all respondents answered this question or made relevant comments in a non-questionnaire response (91%). A large majority answered 'Yes' (80%), with strongest support amongst the local authority (100%) and RSL groups (79%). Nearly half offered generally supportive comments and the WWF campaign response welcomed the Strategy's vision for "warm, high quality, affordable, low carbon homes." However, concerns about implementation were expressed by two thirds of respondents.

1.3 Key issues were: energy supply and energy costs related to fuel poverty; funding, impact on sales and private renting; scope of sustainability strategy and ambition; need to emphasise behaviour change; and technical aspects of improvements to buildings.

1.4 **Energy supply and energy costs related to fuel poverty** RSL and 'other' group respondents suggested that the strategy should address reliance on fossil fuels and peak oil issues, while a private sector organisation suggested that promoting mains gas was not in Scotland's long term interest. The Energy Saving Trust called for the NRP to include advice on income maximisation and fuel bill reduction. Some highlighted the need to influence energy companies' pricing and advice to customers. Views on the fuel poverty target varied: some suggested removing it from the list of objectives because price increases create a moving target, while others suggested increasing funding to meet the target; private sector and 'other' group organisations suggested that the strategy should include consideration of post-2016 avoidance of fuel poverty.

1.5 **Funding, impact on sales and private renting** Respondents pointed to the need for significant investment for existing housing. Several questioned reliance on the Green Deal and ECO, and a few feared that the schemes might disadvantage rural homes. Some RSLs felt they must prioritise scarce funds for housing maintenance rather than energy improvement. There were calls both to impose standards on private landlords, and to change rent-setting and valuation processes so that landlords and developers get a return on their investment in energy efficiency.¹ Some private sector respondents were concerned that rising energy-related building standards may deter investment in new build, and reduce the availability of rural affordable housing, whilst the priority should be improvements to existing buildings.

¹ There was no acknowledgement of DECC's stated ambition to overcome the split incentive for landlords through being part of the Green Deal.

- 1.6 **Scope of sustainability strategy and ambition** Respondents suggested expanding the strategy to cover: water efficiency, waste of materials, embodied energy and life cycle analysis, fire safety, and planning and transport issues. Some considered the proposals to be optimistic because transforming markets would require major cultural change. Others called for higher targets, suggesting: a requirement for an average EPC rating 'B' in 2030; a cut in housing emissions by 42% rather than 36% to compensate for other sectors; for the milestones set out in the first report on proposals and policies (RPP1) to be updated in the second report (RPP2); and a call for Government commitment to the Sullivan report recommendations.
- 1.7 **Technical aspects of improvements to buildings** Professionals highlighted the need for appropriate ventilation levels to avoid condensation due to insulation and consequent damage to buildings and occupant health, while private sector respondents called for awareness that properties should be in a good state of repair ahead of energy efficiency improvements.
- 1.8 **Emphasise behaviour change** There were some calls for education about efficient energy use, including support for house-holders to avoid the 'rebound' effect, and for smart metering to help vulnerable people to understand energy use.

2 **ANALYSIS OF RESPONSES: A NATIONAL RETROFIT PROGRAMME**

- 2.1 Questions 2 to 10 address issues of the National Retrofit Programme (NRP); all were open questions. There was a high average response rate for this section (77%).
- 2.2 The WWF campaign response welcomed the National Retrofit Programme, but did not directly answer the consultation questions. It noted the need for milestones to meet a 42% reduction in emissions from the housing sector by 2020 and eradicate fuel poverty by 2016.
- 2.3 Questions 2 to 4 address how to facilitate the installation of energy efficiency measures in the private sector, including in rural, remote and island areas.
- Q2 What do you think are the main barriers that prevent home owners and landlords from installing energy efficiency measures?**
- 2.4 Most respondents answered question 2 (85%). A quarter provided extensive responses. Some suggested solutions as well as barriers; these are included in the analysis of question 3. A few of the non-standard campaign responses also identified barriers. The main barriers identified are set out below.
- 2.5 **Costs and financing** Respondents pointed out that capital for up-front costs is a particular barrier in lower value first time buyer homes, while investment in energy efficiency may not enhance the value of the property, and measures to improve hard-to-treat properties have long payback periods. There was

confusion about how the Green Deal and ECO would apply, and concerns about whether ECO would be effective for hard-to-treat properties, including uncertainty about the funding of solid wall insulation.

- 2.6 **Consumer perceptions and behaviour, inadequate information**
Consumers were often not aware of the measures or practices they could adopt and the benefits that would result from investment. Residents were often unable to see a direct impact from passive measures such as loft and cavity insulation and installation was unlikely to encourage neighbours to do the same.
- 2.7 **Perceived 'hassle' and disruption.** Several respondents commented on issues such as residents being unwilling to clear loft space or move furniture to allow skirtings to be taped before installing cavity wall insulation. They noted that some measures cause high levels of disruption and that internal wall insulation reduces room sizes. RSLs could also face 'hassle' with Combined Heat and Power (CHP) or district heating schemes where they become the energy supplier, responsible for collecting payments from tenants.
- 2.8 **Questionable benefits of measures, fears of technical problems** Some relayed consumers' lack of confidence in claimed energy savings, and fear of poor quality of work and damage to their homes. There was generally little understanding of wall insulation, while building professionals appeared to disagree over the technical aspects of solid wall insulation.
- 2.9 **Physical nature of the stock** Many respondents identified difficulties associated with the physical nature of the stock, building condition, energy supply, or location. These were illustrated by some of the non-standard campaign responses: these called for research to help those living in granite buildings to insulate their homes and reduce energy burdens; reported problems with the replacement of degraded cavity wall insulation; described the difficulty and cost of heating common urban house types such as ground floor tenement flats; and called for replacements for inefficient white meter electric storage heaters.
- 2.10 **Confusing range of offers and uncertainties about advisors and contractors** Several local authorities felt that households don't know who to trust, with letters from utility companies and door step selling which create suspicions of genuine free offers and fears about bogus callers. Funding mechanisms were difficult to understand and there was a complex landscape of grant provision, with frequent changes in programmes.
- “we have had to report several companies to trading standards for telling people that they are working for the Council when they are not and for stating that the householder will be fined if they do not get loft insulation installed” – Local authority
- 2.11 **Difficulties of improving mixed tenure blocks and common parts**
Respondents noted that improvements were often delayed where the consent

of owners must be obtained and was withheld. This is a particular challenge in non-traditional properties where the cost of retrofit is higher.

- 2.12 Other issues were the **lack of incentives for private landlords**, and **limitations imposed in conservation areas and listed buildings**, a concern also raised in some non-standard campaign responses:

“My house costs £155 per month for electricity and £30 per week, averaged out over the year, for firewood. I am not permitted to double-glaze, even with appropriately designed timber frames, as the house is B Listed - as a pensioner, this is a quite unaffordable burden” – Individual campaign respondent

Q3 Please explain any practical solutions and/or incentives to overcome any barriers you have identified.

- 2.13 Most respondents answered question 3 (85%) and offered possible solutions to some of the barriers they had identified. A quarter provided extensive responses. The following analysis links responses to the key issues identified in question 2 to suggestions in question 3 - often similar solutions were raised to address different issues; some may not be directly relevant to the NRP.

- 2.14 **Funding the work** Respondents recommended a variety of incentives including continuity of funding schemes and assistance for owners, while some questioned the viability of the Green Deal and ECO. All types of respondents called for **incentives** related to energy efficiency improvements or energy generation. Council tax rebates were most often mentioned. Several called for additional reductions in Value Added Tax (VAT), such as a zero rate on insulation, windows, and retro-fitting works, or more commonly a 5% rate on the labour element of home repair, maintenance and improvement works.

- 2.15 Others called for a rebate on Land and Buildings Transaction Tax (LBTT)² for those purchasing the most energy efficient homes or for retrofitting within 6 months of purchase. One respondent suggested a sliding scale rebate for LBTT, up to 100% for achieving an 80% reduction in predicted CO₂ emissions. Others called for a Scottish Feed-in Tariff (FiT) at the previous higher level, and to make the Renewable Heat Incentive (RHI) available to larger landlords such as RSLs. Non-standard campaign responses included calls for making part of the extra expense of zero carbon energy tax-deductible, and to divert subsidy from wind turbines to a retrofit programme.

- 2.16 The **stability of funding programmes for improvements** was a common theme across sectors: a single national universal grant over 5 years would allow better opportunity to engage partners to spread the message and improve uptake; schemes should be funded over the longer term to achieve a reasonable level of stability in the volume of measures. Some commented on the **scope of programmes**, with calls for the continuation of existing programme services including benefit and tax credit checks, referral of

² The replacement for Stamp Duty Land Tax in Scotland, scheduled for April 2015.

households to utilities for energy cost reductions, and energy efficiency advice. There were also calls for a national fuel poverty scheme to complement the proposed area based schemes, and for grant assistance from the energy companies and other sources for low-income owners to install energy efficiency measures.

- 2.17 Some respondents queried whether **Green Deal and ECO** would allow a whole house approach, with sufficient funding for solid wall insulation. Others questioned the viability of the Green Deal and ECO, with suggestions that the Energy Saving Scotland Home Loan scheme should be reintroduced, and for a simpler finance model for Scottish retrofit, based on bulk discounts.
- 2.18 There were several **calls for additional funding**. An RSL called for direct funding for top up loft insulation and solid wall insulation, and also to fund wall insulation for adjoining owner-occupiers so that the RSL would not carry the debt risk. A private sector organisation called for grants or loans to cover both reinstating the property, including redecoration, and ancillary costs such as scaffolding. A non-standard campaign response called for grants or soft loans to be sufficient to enable deep whole-house retrofit (to zero-carbon or passive house standards), rather than repeated small-scale interventions. One RSL suggested a way to limit costs, whereby social housing organisations would share the benefit of competitively procured services with nearby private householders, though with the householder directly contracting the installer. Another warned that requirements might impact on RSL and local authority budgets and work plans based on component lifecycles if equipment were required to be replaced ahead of its due date.
- 2.19 Many respondents suggested measures to counter **consumer perceptions and behaviour, and inadequate information**. These again included calls for **incentives**, such as inheritance tax reductions as well as lower rates of council tax, VAT, and LBTT. Others identified **desirable features of improvement programmes**: information on preventative maintenance in conjunction with an area based scheme with the Local Authority as ‘trusted brand’; area-based programmes with face to face advice, plus intensive support for those in greatest need, regardless of location, similar to the Energy Assistance Package (EAP); impartial advice through the ESSac network; and free insulation measures.
- 2.20 Many called for local and national **awareness campaigns** about energy efficiency and the available grant and incentive schemes – one noted a report in August 2012, which stated that there had been a very low take up (0.04%) of council tax discounts since 2009. Others wanted a practical householders’ guide to retrofit measures for the main Scottish property types, and for sign-posting towards trusted contractors. A common call was for the clear statement of the costs of improvements, and the scale of benefits in improved comfort levels and estimated fuel savings. DVDs and television programmes could show installations of energy saving equipment. Both home owners and private landlords could be helped to understand the potential benefits and issues of improvements with **demonstration homes** that are typical local house types such as a tenement flat or ex-council house, with energy efficiency measures installed. Other measures to change consumer

perceptions were suggested: better use of the Energy Performance Certificate (EPC) at sale or rental; a minimum energy efficiency standard for private rented housing; every home to have a current EPC; a building 'MOT' that addresses the basic wind and watertight condition of a home; and requirements for consequential improvements when building work was done.

- 2.21 There were some suggestions for ways to reduce '**hassle:**' a **support network** providing services such as loft clearance for those unable to carry out the work themselves; staff time and resources to provide advice and practical help to landlords and owners; financial incentives to tenants to decant while improvement works were carried out; and provision of suitable decant accommodation, which was currently very limited across all sectors. RSLs could be provided with dedicated funding for staff to administer district heating schemes.
- 2.22 Of those commenting on measures to counter **questionable benefits** of improvement measures, there were a few detailed responses that identified the need for: good practice in specification, installation, monitoring and awareness raising about specific technologies; assessor and installer training specific to technologies and Scottish house types; guidance and guarantees for work on hard-to-treat house-types; design to consider performance over time; case studies to verify cost models for improvements across all house types, and a national register of building types. Many of these suggestions also apply to issues of the **physical nature of housing stock**. There were several calls to draw together lessons from solid wall projects funded through various Scottish and UK programmes and initiatives; and for better modelling software than RdSAP/SAP for hard-to-treat properties. There were also calls for enhanced funding for rural homes, leniency on targets for hard-to-treat homes, and improvement to energy supplies. A private sector call to empower informed decisions by property owners through an independent survey scheme was illustrated by one of the non-standard campaign responses:
- “if there was someone that could inspect homes like mine (built in 1880s) to find out where all the heat was escaping and check where draughts were getting in so that they could be prevented, that would be an enormous benefit.” - Individual campaign respondent
- 2.23 Other measures to improve the quality of installations included: design informed by research that takes account of how mechanical ventilation with heat recovery (MVHR) works in practice and degradation in performance over time; and third party scrutiny of installers, equipment, and techniques to be acceptable to the warranty and insurance sectors. An example of this was the forthcoming Solid Wall Insulation Guarantee Agency (SWIGA). There were also many suggestions for high levels of funding to support energy supply solutions in rural areas and insulation for hard-to-treat homes.
- 2.24 There were many suggestions for measures to reduce **confusion about the range of offers**. Several called for a one-stop approach through local energy advice teams, with referrals from partner helplines, and consistent promotional campaigns. Some called for a whole property approach co-

ordinated by local authorities and simplified funding streams run by a single agency.

“A whole property approach is needed and not just offering single measures... projects have brought together UHIS, CESP and Private Sector Housing Grant to maximise the measures and funding available .. this included external wall insulation, new roofs and chimneys, loft insulation, draft proofing and where appropriate, new boilers and heating systems.” – Local authority

- 2.25 An assisted-approach Care and Repair model would help older and more vulnerable householders. Reliable advice was a common theme, including:

“There must be more engagement with installers. EST research has shown that the majority of householders rely on the advice of their plumber, electrician when installing replacement heating systems.” –Scottish & Northern Ireland Plumbing Employers' Federation (SNIPEF)

- 2.26 **Difficulties of improving mixed tenure blocks and common parts**

Measures suggested to facilitate co-operation included: financial assistance, possibly with graduated subsidy that would increase in line with the number of units dealt with in one project; learning from UHIS innovative projects; a loft clearance service; and early information and advice to owners to encourage investment in repairs and maintenance.

- 2.27 With regard to the issue of **lack of incentives for private landlords**, views were very diverse, with groups calling for regulation through Private Landlord Registration, albeit with some handholding, and the private sector's advocacy of increased levels of Landlords Energy Saving Allowance (LESA), a phased improvement of stock for large landlords over the period to 2050, and access to ECO funding while a property was empty.

- 2.28 **Uncertainties about advisors and contractors** Respondents recommended investment in the **ESSac network** to support householders through the NRP. Organisations in the 'other' group saw **local authorities as trusted agents**, who would reduce concern about employing disreputable builders, and since they have a strategic role in improving housing, were well placed to identify local needs, to build on existing relationships and services already provided, and to operate a system where householders should have to opt out rather than opt into upgrading.

- 2.29 Private sector organisations and local authorities highlighted the need to use properly qualified and accredited tradespeople: industry **accreditation schemes** included the green energy installation certification schemes administered by the Construction Licensing Executive. There were also local authority Trusted Trader schemes, with local businesses committing to trading fairly and a Code of Practice. Others pointed to independent energy surveys and to products and installations covered by a recognised warranty provider.

- 2.30 **Conservation areas** There were a few calls, including some non-standard campaign responses, for clarity on priorities for Scottish Government conservation objectives, relaxed planning constraints, and for planners to

agree standardised solutions for listed buildings and conservation areas that would not need planning permission.

Q4 Given Scotland's diverse range of housing, what support is needed to enable people to get energy efficiency measures installed?

- 2.31 Most respondents answered question 4 (87%). The key issues, supported by over a third of the respondents to Q4, were: local delivery organisations providing advice and support, with strong support for ESSacs; financial incentives and grants; and extensive communication, information resources, and demonstration projects. Recommendations often repeated responses to question 3. The only new comments concerned measures for traditional constructions, and guidance to ensure that improvements achieve their desired objectives, such as adequate insulation before installing heat pumps.
- 2.32 'Other' group respondents called for support to be extended to measures for traditional housing, particularly in conservation areas: shutters, slim line double glazing, high quality draught-proofing to traditional windows and doors; insulation to rooms-in-the-roof, partial lofts, and floors; and biomass in off-gas areas. One called for RdSAP to be improved to model extensions, rooms in the roof, and multiple heating systems which were increasingly common in off-gas properties. Another respondent cited an example where an air source heat pump had been installed without adequate building insulation, highlighting the need for competent analysis and advice to ensure that programmes have the desired outcome, including reduced fuel bills.

Q5 a) What specific issues need to be addressed in respect of improving energy efficiency in rural areas, particularly more remote or island areas? b) How should these be addressed?

- 2.33 Most respondents answered questions 5a (70%) and 5b (70%). Some stated that they did not feel it appropriate to give opinions on rural issues. Also, some non-standard campaign responses addressed the particular problems of rural areas.
- 2.34 The key issues identified were: the rural premium, energy supply and high energy costs, the nature of the building stock and building condition, difficulties in accessing programmes of support, and low incomes.
- 2.35 Nearly half of respondents identified the issues of the **rural premium** – higher costs due to access and low density and the concomitant unwillingness of companies to work in rural areas, plus relatively poor value for money in terms of the emissions reductions that could be achieved. Distance from supply chains meant additional transportation costs, difficulties in achieving economies of scale, and more time to complete works. A private sector respondent noted that the cost of servicing rural and hard-to-treat areas may be disproportionate to the carbon and consumer energy saving realised. Another noted that many homes were easy to improve, but their location was a barrier to cost effectiveness.

2.36 Over a third identified **energy supply and high energy costs** for areas off the gas grid, and dependent on electricity, oil, or LPG³ including non-standard campaign respondents. An RSL highlighted the difficulty of improving homes with wet electric heating systems and called for additional funding to improve properties off the gas grid. Also, it did not consider practicable any improvement that would cause significant disruption to tenants. The cost of domestic fuel in island areas was crucial to addressing the problem and one respondent advised that if prices kept rising, the benefit of any works done would be negated and families would remain in fuel poverty. Comments about woody biomass included both concerns about a lack of affordable biomass, and the observation that many households used firewood to avoid fuel poverty. One queried the treatment of firewood in SAP calculations and pointed out that installing central heating for rural, fuel poor households who under-heat their homes, could increase their energy bills.

“I live in an area that depends on oil for heating and apart from not helping the emissions problem I'm sure you are well aware how volatile the price of that can be - please don't ignore us because we live outside of towns.” – Individual campaign respondent

2.37 Over a third identified the **nature of some of the building stock and building condition**, with a high proportion of hard-to-treat (as well as hard-to-heat) properties. Respondents identified several issues of housing in rural areas: the expense of treating detached houses, the poor condition of properties due to climate, the high average age of many houses, and construction types including solid wall construction or cavity walls in exposed locations, and coomb ceilings that require intrusive or costly measures.

2.38 Nearly a quarter identified **low income and difficulties in accessing programmes of support**, even in areas of high fuel poverty, due to eligibility criteria that do not take account of rural densities. Homes below tolerable standard (BTS) were likely to be occupied by older people, single persons, those on low incomes and insecure or seasonal employment, or people relying on more than one source of part time employment. The use of multiple deprivation indices as a means of targeting grant support was seen to work against many rural areas and islands and there was concern that this was being repeated in the targeting of the Green Deal and ECO.

In the Highlands “a combination of low average incomes, a long heating season, limited access to mains gas and a high proportion of traditional stone-build houses give particularly intractable problems of fuel poverty” – Individual campaign response

2.39 Many addressed the **design and delivery of schemes of support**, calling for additional funding for rural areas, with obligations on utilities to support these areas, and learning from the experience of earlier and current schemes. Respondents recommended funding options: for specific grant incentives targeting areas off the gas grid; for subsidy to be a percentage of installation costs rather than a flat rate; and for access to the range of local, national and

³ Liquefied Petroleum Gas

European resources. Utilities should be required to help improve remote and island areas, even though such locations may not provide the optimum economic return; one queried whether the [Warm Homes Fund](#) would target fuel poor rural households.

- 2.40 The submission from Highland Council had an appendix with detailed recommendations for delivery of improvements, including administrative processes, communications skills, processes to determine the appropriate solutions for traditionally built homes, non-standard properties and awkward cases, funding for pre-requisite improvements such as removal of asbestos, branding, use of locally based contractors, and understanding of the customer's experience and outcomes. Other respondents called for subsidy to upskill local contractors in installation and maintenance, particularly to minimise delay in servicing new technologies, and for appropriate training for surveyors and installers, both in technical skills and customer service. There were also calls for improvement programmes to maximise the involvement of local construction and supply businesses, including business development to access contracts, and procurement systems to effect economies of scale.
- 2.41 Some respondents called for the **use of renewable energy**, particularly community systems. Respondents gave the example of remote communities, such as Eigg, with their own energy mini grids, and residents educated about energy budgeting to smooth out demand. Community based grants were needed for rural heating systems in villages. Other suggestions were the use of alternatives to LPG such as biofuel by-products from waste, small scale biomass, or micro hydro – but combined with a fabric first approach. One respondent proposed reduced energy costs for communities near large wind turbine sites. However, a few respondents pointed to difficulties with some domestic technologies and running costs, particularly the poor performance of heat pumps resulting in under heated homes and increased fuel bills, and the fact that most renewable technologies require regular maintenance and would degrade over time.
- 2.42 Respondents again called for technical guidance on solutions for **hard-to-treat** properties, and for a fabric first approach, including case studies, as in preceding questions. Some RSLs commented on the need to share information between housing providers about the success or failure of specific products for various house types, and the practicality of solutions with regard to tenant disruption and the need to decant into alternative accommodation.

Q6 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?

- 2.43 Most respondents answered question 6 (87%).
- 2.44 All but one⁴ of the local authority group responded. They advocated a central role for local authorities in managing energy efficiency improvements across

⁴ A special interest partnership.

tenures, with only two exceptions who mentioned less central roles. A few of the local authorities advocated a regional partnership, or partnership with other organisations, and a facilitating rather than delivery role. Many wished to build on the success of the UHIS, although some noted that delivering solid wall insulation under the NRP would be more resource intensive.

- 2.45 Few offered opinions on the funding options set out in the consultation, but there was concern about the challenge funding model and more support for the Scottish facilitated funding model than the formula-based model. However these findings were based on very few responses.
- 2.46 Only eight respondents commented on the **Homes for Scotland proposal** whereby builders of new homes would contribute to a fund for the improvement of existing homes in lieu of even higher building standards. Reaction was mixed and polarised – it ranged from the view of one ‘other’ group organisation that action on the existing housing stock should not be at the expense of progress towards zero carbon new build to another which saw the proposal as “a cost-effective way to achieve the vision of the Sustainable Housing Strategy, without driving up the costs of new homes at a time of financial pressure on house-builders and buyers.”

Q7 What role should the Scottish Government play in a National Retrofit Programme?

- 2.47 Most respondents answered question 7 (86%) and identified various roles for Scottish Government.
- 2.48 Almost two thirds identified the key role as **maximising resource and providing funding** for the programme, including negotiation of Scotland’s share of UK funding; identification of a budget to support the programme, with funding to support local authorities and Energy Saving Scotland advice centres, research and development into technical solutions and training.
- 2.49 Nearly as many identified the role of **setting standards and designing the programme**, reviewing lessons from delivery of UHIS and EAP to provide both area based schemes and support to vulnerable households in fuel poverty; consulting with industry; removing red tape; maximising community benefits, and procurement efficiencies.
- 2.50 Over a third suggested **facilitation and oversight**, co-ordinating the work of local authorities and other agencies, and monitoring progress of delivery. Over a third called on Scottish Government to **manage information**, including promoting awareness of the scheme, disseminating information on technical options, and supporting systems to identify need and track progress.

Q8 What role could the devolution of additional powers play in achieving more retrofit?

- 2.51 The consultation does not suggest what the potential impacts for the devolution of additional powers or discussion of reserved matters might be. Perhaps as a consequence, less than half the respondents answered

question 8 (47%), with particularly low response rates in the professional and 'other' groups. A few commented that without knowing what the devolved powers might be they could not respond.

- 2.52 Less than half of those answering question 8 identified tax powers and control of budgets as having most impact on achieving more retrofit. Some proposed a reduced rate of Value Added Tax to encourage repairs and maintenance work, but there was uncertainty about this following a European Commission ruling on the VAT directive. A few suggested the use of rebates under the forthcoming Land and Buildings Transaction Tax, in common with responses to several questions in the next section, on the role of standards.
- 2.53 A few pointed to fund-raising powers, the devolution of 'financial incentives,' and greater control of budget spending. Some suggested that new capital borrowing powers under the Scotland Bill could allow increased investment in the NRP, more flexibility and longer term planning. Opting out from the Green Deal might allow Scotland to deliver a more joined up programme, with better response to local circumstances. Others queried whether the replacement for the Social Fund in Scotland might include measures to tackle fuel poverty, and whether devolution might allow Scottish Government to set welfare benefit levels.
- 2.54 However, the SFHA suggested that there was scope within the existing Scottish Budget, and through the Scottish Government's allocation of European Structural Funds, to move sufficient funds to energy efficiency in order to meet the targets on fuel poverty and climate change.
- 2.55 Three respondents identified opportunities concerning energy company obligations. Two argued that Scotland could demand a minimum percentage spend of ECO funding, and a third that FIT and RHI could be altered to promote greater uptake of micro generation in a Scottish context. However, two other respondents thought there could be no significant impact of devolution on regulation in the gas and electricity markets, or the price of energy, although one suggested that the Scottish Government might introduce powers to regulate the domestic oil, LPG and solid fuel distribution markets in Scotland.

Q9 What further action is needed to achieve the scale of change required to existing homes?

- 2.56 Most respondents answered question 9 (76%), with particularly high rates of response in the local authority and RSL groups. Many responses reiterated issues raised earlier and only a brief selection is included.
- 2.57 Nearly half of those who answered question 9 identified the need for **improved information**. This included: case studies, both for urban hard-to-treat flats with demonstration of before and after performance, and for rural homes, linking with small biomass, biofuels from waste and community district CHP; mainstreaming energy efficiency as part of home improvements, so that it was part and parcel of 'doing up the house;' a single brand to support householders and landlords for energy advice.

- 2.58 Nearly half called for **incentives and grants for retrofit**, for **increased investment in new build**, and for **long term budget commitments**. Funding should improve and up-skill labour capacity in Scotland.

“Scottish Government will not achieve the scale of change required without offering incentives to householders and there is a need to be flexible and transparent about what offers are made. Cost is important and householders will not consider measures that are too costly or where there is a fear that additional unknown costs will be added. Fixed price offers have proved successful...” – Local authority

- 2.59 Less than a third of respondents considered compulsion and targets. This issue is discussed more fully in the following section on standards. Others identified the need for local programmes, issues of training, accreditation, and procurement, removal of planning barriers; improving building condition; and establishment of a central register of building data.

Q10 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)?

- 2.60 Most respondents answered Q10 (78%), with many emphasising the need for partnerships with trusted intermediaries to promote the programme, ways to prioritise work for people in need, helping people in the private rented sector, reassurance, and for effective communications including one-stop shops.

- 2.61 Over two thirds of the respondents commented on the need for trusted engagement and delivery agents, working with partners to prioritise work for people in need, seeking to work with private sector landlords, and measures to provide reassurance. The NRP would need to draw on the skills, expertise and knowledge of trusted intermediaries and local champions to promote it within communities. Partners should be supported by funding of face to face advice, case studies of best practice, training, peer support networks, and ESSac Community Liaison Officers. Respondents suggested partnerships with health visitors, community nurses, care services, MacMillan nurses, social workers, Community Planning Partnerships, community interest groups, WRVS, cultural groups, groups engaging with ethnic minorities, private landlord forums, Neighbourhood Partnerships, schools, Age Scotland, housing associations, and energy suppliers. Local authorities should identify and prioritise need, working with occupational therapy services, NHS Boards, and representative groups for vulnerable people.

- 2.62 Local authorities should also check records of maintenance and repair programmes to identify property condition. Consumer assurance could be provided by a scheme of independent surveyors allied to approved contractors with appropriate skills to allay fears of shoddy workmanship and exploitation. One respondent also called for provision of independent financial advice. Several called for advice to single property private sector landlords:

“Many of these disadvantaged groups live in private rented accommodation where it can be very difficult to gain landlord permission for improvements.

- New initiatives should be taken to encourage landlords to improve their properties and the quality of life of tenants.” – Local authority
- 2.63 Over a third called for **communications and engagement** campaigns, including presenting a long-term **unified brand** to consumers and advice agencies, with consistent messages. There needed to be an **engagement campaign at community level**, with local events supported by professional and voluntary bodies, including ‘meet the installers’ events, and information distributed by mobile libraries and ferry services as well as national media, local radio, local newspapers, community newsletters, and charity shops. The campaign should provide **accessible information and advice** in many languages and formats, including non-written. Some advised against over-reliance on online or telephone services alone because this disadvantages certain groups. Some respondents called for a **one-stop shop approach** with face to face energy advice plus benefits and utility tariff checks to boost income and reduce energy costs; and for funding for outreach work with home visits. Some called for **practical measures to improve delivery** for vulnerable households, including training for installers to provide extra levels of care and support. There were also broader amenity and life safety recommendations on related matters, perhaps beyond the immediate scope of the consultation – e.g. to require social housing to install showers to save water and energy; and for fire and safety measures for vulnerable people.
- 2.64 Over a third called for **targeted financial support** that would prioritise vulnerable people within area based schemes. There should also be free or low cost measures for fuel poor regardless of location or tenure. Funding should target over-75s, and people with illness or disability. One respondent highlighted the need to extend help to incapacitated people not on Disability Living Allowance (DLA) or over 50 who were ineligible for Care and Repair. A few advocated free work for people where health was affected, irrespective of income. Some again called for enhanced ECO support for rural homes where improvements cost more, and for an incentive such as a council tax rebate. One respondent called for measures to be under-written so if they prove problematic people were assured they would be fixed. A private sector organisation called for prioritisation of work on a cost-benefit basis of energy or carbon savings.

General comments on the National Retrofit Programme

- 2.65 Some organisations expressed strong support for the NRP outwith the questionnaire itself: The Scottish Building Federation highlighted the opportunities the NRP would offer to Scotland’s construction industry, while noting that a huge increase in resources would be needed to achieve the Strategy’s vision and objectives. Consumer Focus Scotland observed that minimum energy efficiency standards would be needed to encourage take-up of measures under the NRP, and welcomed the support that it would provide for consumers to help them meet new standards. SFHA welcomed area-based programmes under the NRP as the most cost effective way to improve the energy efficiency of existing homes, while at the same time calling for a safety net for tenants or owners in fuel poverty who live outwith designated NRP areas. The Chartered Institute of Housing welcomed the plans for an

NRP, while highlighting the critical need for financial support for low income households and the need for links between minimum standards and financial market transformation to make energy efficiency something which was valued by buyers and sellers.

3 ANALYSIS OF RESPONSES: THE ROLE OF STANDARDS

3.1 Questions 11 to 33 address the role of standards.

3.2 Questions 11 and 12 address the issues of introducing a condition standard for all housing and a maintenance checklist.

Q11 a) Should the Scottish Government consider whether a single mandatory condition standard (beyond the tolerable standard) should apply to all properties, irrespective of tenure? b) If so, how would that be enforced?

3.3 The consultation referred to the Scottish Housing Quality Standard (SHQS) that social housing must meet by 2015. It stated that the only requirement for owner occupied housing was that it should meet the tolerable standard, which is a minimum condemnatory standard for all housing. Privately rented housing must also meet the repairing standard. Since 2006 the tolerable standard has included a requirement for “satisfactory” thermal insulation; the repairing standard does not address energy efficiency issues.

3.4 Parts a) and b) were distinct questions. However, most of those who did not agree with the first part chose to give comments under the second. Thus the response to part b) was higher than that for part a) and included a higher proportion of negative comments than would otherwise have been expected.

3.5 Over three quarters of respondents answered question 11 a) (77%), with a particularly high response rate from the RSL and local authority groups. Most of these answered ‘Yes’ (77%), with the full support of the professional and ‘other’ groups, but with the private sector group split between ‘Yes’ and ‘No.’ There was no space provided for comment on question 11a, although two respondents noted ‘yes with caveats’ and ‘no, not at this time,’ while three respondents who didn’t use the questionnaire format were recorded as ‘comment only.’

3.6 Even more responded to question 11 b) (81%), including all but one of the respondents who said ‘No’ to question 11a). Some of those who had answered ‘yes’ to part a) used part b) to raise issues about part a). The variety of comments made in response to 11 b) suggests that there was considerable diversity of views or perhaps confusion about what the question meant or what the proposed standard would entail.

3.7 Overall the most commonly occurring comments were: that additional resources would be needed for enforcement or that local authorities did not have sufficient resources for enforcement – local authorities are already under strain as a result of increased enforcement and monitoring of dangerous and

defective buildings; that enforcement would be difficult because local authorities have difficulty in identifying BTS (below tolerable standard) properties or properties that fail the repairing standard; that enforcement should be by the local authorities; that enforcement should be at point of sale; and that incentives should be used to achieve compliance. Some respondents referred directly to energy efficiency standards and did not mention condition standards.

- 3.8 The responses suggested that many respondents had concerns about compulsion, which might result in some properties becoming un-saleable or un-lettable, which might result in more empty homes and increase further the demand for social rented housing. Private rented sector tenants may be reluctant to report poor energy efficiency, and the Private Rented Housing Panel may need to deal with complaints, while for owner occupiers, there may be human rights or other legal issues involved in forcing individuals to improve their property.
- 3.9 Some respondents expressed a preference for information and incentives over compulsion. Such incentives might include a lower rate of LBTT for properties that were compliant or made compliant within a short period after purchase.
- 3.10 Although local authorities were the enforcement agency most commonly suggested, other agencies were suggested by small numbers of respondents – the Home Energy Efficiency Database (HEED), the Scottish Housing Regulator (SHR) for social housing, the Private Rented Housing Panel (PRHP) or ‘a national enforcement agency.’
- Q12 a) In box 6 we identify a checklist for maintaining a quality home. Do you agree with our proposed hierarchy of needs? b) If you think anything is missing or in the wrong place please explain your views.**

“Box 6: Looking after your home – a hierarchy of needs:

1. Make sure that your home is wind and watertight and that it is structurally sound, make sure that it stays that way by carrying out regular maintenance.
2. Make sure that work is done properly because poor quality repairs may be ineffective and can cost more in the long run.
3. Consider retrofitting appropriate insulation.
4. Make sure that your home is properly ventilated because this is essential to keep it healthy.
5. Review your boiler to ensure that it is efficient.
6. Ensure that points 1-5 have been addressed before considering micro-renewable technology.”

- 3.11 Most respondents answered question 12 a) (76%), with the lowest response rate in the private sector group. Of those responding, most answered ‘Yes’ (70%). Almost two thirds offered comments in response to question 12 b) (63%).

- 3.12 There was therefore general support for the principle of such a hierarchy. Respondents offered advice on: the potential use of the hierarchy; additional criteria or the need for supplementary guidance; rewording; and alternative ordering. Comments also addressed the potential use of the hierarchy and its standards, for example: it was a 'reasonable guide' for a 'reasonable lay person' but needed objective standards or measures; 'appropriate insulation' begged the question of what was appropriate (thickness of insulation or a specified point on an energy efficiency scale, appropriate to a particular type of house)? what was meant by 'appropriate ventilation' or an 'efficient' boiler?
- 3.13 Over a third of those commenting suggested additional criteria or the need for supplementary guidance. Under checklist item 1, respondents recommended adding information about the annual inspection of roofs and external parts including gutters as a low cost preventative measure, together with a schedule of what, when and how, rather than just stating the need to complete basic maintenance; others suggested it would be useful to include sources of reputable advice and information on repairs assessment and implementation; and that the first item should be having a plan to proactively check and maintain the property.
- 3.14 Under checklist item 2, comments included: the need for the public to know how to go about finding properly accredited contractors to carry out work and how to check accreditation; they may also need a specialist chartered surveyor; the guidance should include consideration of safety, so that it reads: .."poor quality repairs may be ineffective or unsafe and can cost more in the long run."
- 3.15 Under checklist item 3, respondents suggested the addition of the following issues: consideration of the energy efficiency of replacement windows or doors; explanation of the benefits of a fabric first approach; room to room and floor to floor insulation (as well as whole house), with zoned heating and timer controls; draught proofing and air tightness, e.g. draught strip around windows, doors and wall abutments to prevent draughts and heat loss.
- 3.16 Under checklist item 4, respondents recommended that mention of ventilation should be expanded with advice to take care to avoid condensation and mould growth, and that mechanical ventilation might be necessary.
- 3.17 Checklist item 5 drew the most comments, with recommendations that detail of heating systems in non-gas areas should be given, also there should be notes to 'contact your local advice centre to review the availability of grants and funding to help you improve the energy efficiency of your system,' and 'when heating needs replaced, appraise all options before deciding on new system - don't assume like for like;' and also notes to highlight the need for regular servicing and the importance of ventilation for open flued gas boilers.
- 3.18 Under checklist item 6 respondents advised the addition of: adequate safety of electrical installations, hot water and smoke detection; eliminating damp, regulating temperature, and keeping out vermin; for radon protection areas, include the need to take appropriate measures to limit ingress of radon.

- 3.19 Some suggested rewordings: “Consider retrofitting appropriate insulation” was felt to be timid - reword to make it more directive; say ‘Install insulation where it is technically feasible to do so.’ “Review your boiler to ensure that it is efficient” assumes everyone has a boiler - rewording suggestions included: ‘Check whether your heating system is as efficient as it can be; if not, consider improving controls, or replacing it.’ The final point was “Ensure that points 1-5 have been addressed before considering micro-renewable technology,” but there may be good reasons for installing a solar panel before external wall insulation– re-word: ‘Consider installing solar panels or other appropriate microgeneration equipment.’
- 3.20 Several respondents advised that any checklist should use plain English and avoid jargon such as ‘retrofitting’ and ‘micro-renewable technology.’ One respondent suggested that housing professionals would make sense of the hierarchy of needs, but home owners or landlords might not.
- 3.21 Some queried how the checklist might be used, by whom, and the appropriate level of detail. The consultation document noted that the hierarchy would ‘help owners to prioritise how they invest in their properties,’ however it was unclear how this information would be communicated to home owners and more detail would be required if this information was to be meaningful to householders. Consideration should be given to how the checklist would be publicised. Would the ‘hierarchy of needs’ be used as criteria for incentives and grants? Would it change how ESSacs deliver their advice?
- 3.22 Some suggested alternative ordering of the hierarchy. Ventilation should come before or at the same time as insulation - a property that has insulation retrofitted without addressing ventilation could deteriorate due to condensation.⁵ Views on ‘ensuring that work is done properly’ (currently 2) were contradictory: one respondent suggested it was given too much priority, another suggested it should be moved to number 1 as it was fundamental that any work would be done properly. Another proposed moving heating system (currently 5) to 2 or 3. One respondent advised variable ordering because a rigid approach cannot always be taken: for example, RSLs had developed CHP schemes ahead of insulation - decisions would always be partially influenced by funding, particularly when funding was limited or targeted on particular technologies.
- 3.23 Questions 13 to 18 address the powers of local authorities.
- Q13 Should local authorities be able to require that owners improve their properties, in the same way they can require that they repair them?**
- 3.24 Most respondents answered question 13 (81%), including most of the responding local authorities (88%). Over half of those responding answered ‘Yes’ (62%), with strongest support from RSLs. All except three of those saying ‘Yes’ expressed some caveat or qualification. More than a third of the

⁵ See references: Zero Carbon Hub, Ventilation and Indoor Air Quality Task Group (2012)

local authority, private sector, and professional groups answered 'No,' including Glasgow City, City of Edinburgh and seven other councils.

3.25 Relatively few answers directly reflect the consultation paper's emphasis on these powers being needed primarily to support the achievement of SHQS in mixed tenure situations – the question appears to have been interpreted more widely by many respondents. Key issues were: recovery of costs and resources for enforcement, and enforcement issues.

3.26 Local authorities commented: that enforcement action would be impractical due to the **scale of the action required** and the **costs incurred by the council** when owners could not or would not pay for the works; that recovery of cost for enforced work was already a significant issue for local authorities; that to extend powers further without additional resource would be meaningless; that serious disrepair must always be prioritised over enforcement of 'desirable' but not essential works; that additional powers for recovery of monies and government support would be needed as the current method of recovery, the Repayment Charge, allows up to 30 years for repayment - local authorities could find themselves having to fund the retrofit programme. Where local authorities have tried to recover costs for repairs to mixed tenure and privately owned properties (under the Building (Scotland) Act 2003 and Environmental Protection Act 1990) this was often problematic and costly. The **current shortage of staff and financial resources** to take action on repairing issues could be exacerbated by adding energy efficiency works unless additional resources were applied from the National Retrofit Programme or Green Deal. Enforcement might raise complex issues:

“Care would also have to be taken to consider how requiring owners to make energy efficiency improvements to their properties would sit with pre-existing repair issues where these existed. There would be no point for example in installing solid wall insulation (backed by funding from ECO) where a roof needs urgent repair but this repair has not been enforced due to lack of finance.” – Local authority

3.27 RSL, private sector, professional, and some 'other' group respondents also highlighted difficulties of enforcement: the proposals would impose unsupportable pressures on local authorities; an RSL observed that there was no means of forcing the councils to utilise their powers; the cost of monitoring and enforcement would be prohibitive; enforcement was under-used now-how would councils cope with expanded powers? Other issues were the introduction of a cumbersome and costly bureaucracy and how best to pinpoint low efficiency housing and store information about it.

3.28 Further issues included **costs to owner-occupiers and landlords**. Local authorities pointed out that in the current economic climate many owners were struggling to carry out basic repairs to their properties; reduced equity and poor availability of repair grants meant there was less incentive for owners to repair their homes, let alone improve them. Problems financing improvements pointed to the need for a body such as a national lending unit. Several respondents suggested that there would be a need for a strong link to grants and assistance from Green Deal / ECO, particularly for higher cost measures

such as solid wall insulation. There was a concern that improvements to a multi-tenure tower block might only be partly funded by ECO.

- 3.29 Private sector organisations also asked for consideration of low income home owners, and pointed to the risk of an increase in repossessions, and impact on markets. Compulsion to improve energy efficiency would be inappropriate, particularly if measures were not cost-effective due to the nature of the building.
- 3.30 Some respondents suggested **limitations on the scope or application of the power**. Local authorities suggested that given the resources needed for enforcement, notices should only be served on re-letting, work on common parts, empty homes, sale of sub-standard property. While the focus of local authority intervention should be repair and maintenance rather than improvement, it would be beneficial to include improvements whilst repair works were underway. Finally, the need for enforcement should be balanced by a need to retain landlords at a time of housing shortage.
- 3.31 RSL and 'other' groups suggested targeting use of the power on a worst-first basis or in response to high levels of fuel poverty in particular areas. It was felt appropriate to enforce against private landlords but not private owners, and to enforce for basic measures only – it would be difficult to enforce high cost measures such as solid wall insulation unless these were fully funded.
- 3.32 Some respondents, including one local authority and two RSLs, would welcome a power to ensure improvements in **mixed tenure or multi-owner** blocks – and indeed this was the context in which the consultation envisaged such a power being used. This could support the achievement of the SHQS in mixed tenure blocks. In blocks where the local authority had an interest, it could coordinate the work, and in privately owned mixed blocks this could link to new proposals on property factors. However, there were particular problems in Edinburgh tenements as the City of Edinburgh Council system of statutory notices had been curtailed.
- 3.33 Other comments included suggestions for alternative approaches. Several suggested that a first step should be to expand HMO type legislation and licensing of landlords. Any landlords unable or unwilling to make improvements might then sell up to more professional property companies. One respondent commented that whilst the priority was to ensure that owners meet their responsibility to keep properties wind and watertight and structurally sound, it was also important to encourage them to improve energy efficiency during repairs or larger projects such as roof replacements. Private sector organisations again proposed the introduction of building MOTs with inspection and certification to encourage owners to implement a planned maintenance regime and to assess options for improving energy efficiency.
- 3.34 Some questioned whether such powers could legitimately be applied to energy efficiency improvements. It was felt that responsibility for decisions to improve a property should remain with the owners - it might be legitimate to require a roof or stonework repairs in light of public safety concerns, but could the argument be extended to installation of insulation? Another respondent

thought that an improvement notice concerning energy efficiency should be supported with subsidy because, unlike structural integrity, it would not be seen as detrimental to the health of the occupant or the building.

- 3.35 Other issues raised included the difficulty of improving insulation in historic properties without damaging the building or its historic qualities, and whether it would be reasonable to require improvements of households with low energy consumption living in energy in-efficient homes as the carbon impact might be balanced.

Q14 Should local authorities have a power to enforce decisions taken by owners under the title deeds, tenement management scheme or by unanimity?

- 3.36 Most respondents answered question 14 (73%), including most of the responding local authorities (85%). Most of those responding answered 'Yes' (73%), with strongest support from the private sector and professional groups.

- 3.37 There was more support for this proposal than for the enforcement of improvement powers in question 13, with local authorities expressing varying degrees of caution. One suggested that local authorities should have discretionary power to support owners by meeting 'missing shares' where works were a priority in the Scheme of Assistance, avoiding serving works notices for small scale works; this would remove the need to serve a work notice where an owner has no objection to the works but was unable to pay. Another authority stated that this power would increase the effectiveness of Tenement Management Schemes (TMS) by giving them the necessary 'teeth.' A cautionary point was made in relation to large cities - extensive resources would be required to enforce decisions, given the high proportion of households living in flats.

- 3.38 RSLs, private sector, and 'other' groups supported the proposal as a catalyst to allow energy efficiency schemes to move forward, to ensure that properties were improved when in mixed tenure buildings, to assist homeowners and factors in carrying out maintenance and mitigating the need for significant future work, easing pressure on 'grant application' and 'statutory repair' work. However, some private sector organisations wanted the further power to take over the voting rights, make payment and recover from non-paying parties.

- 3.39 The most common concern was the **recovery of costs**. Local authorities felt that enforcement should focus on help to fellow owners to recover costs rather than putting the burden on local authorities. It was suggested that any powers to enforce decisions under TMS would need to be matched by an ability to put a repayment charge on the title. It was stated that there were already mechanisms for owners to pursue decisions made under the title deeds, the TMS or by unanimity, but they were complex and costly - a practical response would be to streamline such processes or create a more responsive arbitration process. Respondents reported that payment orders were extremely bureaucratic to use, with associated legal costs, and a 30 year repayment term, and that it would be difficult to secure such resources in the current economic climate. A local authority suggested that private

landlords often held up improvements and that new powers should aim to speed up the process.

- 3.40 Some respondents questioned whether a new power was needed; they believed that existing legislation allowed local authorities to enforce these decisions.
- 3.41 An RSL suggested the power should come with an obligation to implement, while local authorities said it ran counter to the intention of the Housing Act to refocus responsibility for maintenance and repair on owners, which lay behind the removal of a statutory right to grant in respect to enforcement notices.
- 3.42 Glasgow City Council drew attention to the Factoring Commission, due to report in 2013 (see Annex C), while one of the third sector organisations suggested the use of agent organisations:

“Yes - however, we need to be aware that most local authorities are not geared up to use such powers effectively. It would be useful to explore the use of agent organisations – such as RSLs – which might intervene on the authorities’ behalf; and how such agents would be incentivised.” – ‘Other’ group

Q15 Should local authorities be able to automatically issue maintenance orders on any property which has had a work notice?

- 3.43 Over half the respondents answered question 15 (63%), including most of the responding local authorities (88%). Most of those responding answered ‘Yes’ (81%), with strongest support from the ‘other’, RSL, and local authority groups.
- 3.44 Over a third gave reasons to support the proposal; six repeated their answer to question 13. This could prove beneficial in promoting a factoring service due to heightened awareness of maintenance rather than belated repair, thus protecting the investment. Several local authorities felt this should not be mandatory - local authorities should have this option available as a tool to improve energy efficiency. It could be used for those situations in which there was thought to be risk of deterioration, not automatically. However, three respondents suggested that such a power was unnecessary because there are **existing powers**: [Section 42 of the Housing \(Scotland\) Act 2006](#) allowed a maintenance order to be issued if a Local Authority considered a house had not been, or was unlikely to be, maintained to a reasonable standard.
- 3.45 Private sector organisations were stronger in their support. They felt that maintenance orders helped reinforce the obligation under title to maintain the property. By stopping properties falling back into disrepair they would help increase the supply of housing and save property owners money in the long run. They would need an accompanying programme of maintenance information for property owners. Some local authorities queried how effective maintenance orders had been to date.

- 3.46 A quarter of those responding raised issues of **resourcing**. Whether policed in-house or contracted out, resources would be significantly stretched to monitor and enforce the five year maintenance plan. The power should be available, but given the costs in time and resources and the precedents it would create, it was likely to be used sparingly; without resources to monitor compliance and significant penalties for non-compliance, such action was unlikely to have any greater impact than current information and advice strategies. One RSL commented that there was already a huge backlog of maintenance order work in Glasgow and experience in Edinburgh had caused a loss of trust in local authorities' ability to manage maintenance orders.
- 3.47 Other respondents raised issues of common definitions: it would be helpful to stipulate what was required for the fulfilment of householder responsibility towards 'reasonable repair' so that standards were consistent across Scotland.

Q16 Should the process for using maintenance orders be streamlined, and if so, how?

- 3.48 Around half the respondents answered question 16 (49%) including most of the responding local authorities (88%). Most of those responding answered 'Yes' (87%), with many general comments and local authorities offering detailed suggestions on maintenance orders (MO).
- 3.49 ALACHO stated that they were aware that some councils saw the process for implementing MOs as time consuming, cumbersome and bureaucratic, and that any streamlining here was certain to be welcomed. Some individual local authorities also called for a review of the use of MOs.
- 3.50 MOs were most likely to be required for large, mixed tenure flatted properties: one local authority considered excessive the requirements to write to many different parties, to liaise informally with residents and landlords, identify all owners, prepare and serve individual MOs for all properties, owners, landlords and creditors and notify all interested parties of the assessment of any plan forthcoming.
- 3.51 The process allowed two 21 day appeal periods and two local authorities reported that it cost £60 per flat per registration of the MO and maintenance plan (plus a further £60 if varied or if revoked) – one local authority suggested there should only be one appeal procedure and one registration, when the Order was recorded against the Title. It was suggested that the process of registering the MO in the appropriate land register should be streamlined and should be recoverable from owners.
- 3.52 Alternatively, MOs might be recorded in the Building Standards register (as for Works Notices) and that if a plan were to be produced, it could be registered

on titles and the order removed from the Building Standards register.⁶ Another local authority suggested that the process of extending the Maintenance Plan beyond 5 years might be streamlined.

3.53 One local authority stated that the process was not the main impediment - funding the initial outlay was more problematic. Another proposed that local authorities could provide more specific guidance or set out a maintenance plan with the order to prevent delays created by inexperienced persons attempting to draw up their own plan. Another suggested that inaction and non-payment by landlords should be considered in the Fit and Proper test for landlords.

Q17 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?

3.54 Over half the respondents answered question 17 (58%), including most of the responding local authorities (88%). Most of those responding answered 'Yes' (75%).

3.55 Most local authorities welcomed the proposal. One commented that the process to create an HRA was complex and would welcome the ability to deal with issues of amenity, safety and security without the need to declare an HRA. Another noted that the powers under Section 179 of The Town and Country Planning (Scotland) Act 1997 were not always suitable to deal with eyesore properties. One suggested that limiting Notices to 'essential' works missed opportunities for creating more sustainable housing, giving the example of costly multiple patch repairs where a re-roof would be more cost effective.

3.56 Other local authorities raised issues including resourcing and existing powers. One said that given that the problem of disrepair under current legislative arrangements far exceeds available resources, any new proposals would be academic without substantial, additional investment. Another suggested this should not be a duty on local authorities and probably limited to safety and security. Another commented that owners in a tenement have powers to resolve safety and security issues through the Tenements Act and that the Work Notice should remain a tool for repairs rather than improvements. Others referred to existing powers under the 2006 Housing (Scotland) Act to issue work notices for properties outwith HRAs and the use of maintenance orders, while another noted the need to address any cross over with the existing tolerable standard, or other legislation such as the Civic Government (Scotland) Act 1982 or building standards.

3.57 There were differing views among private sector organisations, some querying whether this should be restricted to safety and security rather than

⁶ Information to be lodged on the Building Standards register is prescribed in legislation, which would need to be amended should it be decided that registration could include maintenance orders issued under the Housing (Scotland) Act 2006.

amenity, or should cover repair and energy efficiency while including other criteria such as security and safety (other than fire safety) may be too heavy handed.

“We consider sufficient rights already exist. A Housing Renewal Area can be designated if a Local Authority considers the “appearance or state of repair of any houses in the locality is adversely affecting the amenity of that locality” Work Notices can be served on sub-standard houses outwith an HRA... If there is a risk to safety, we consider the house would be substandard. We do not consider it appropriate to allow service of a Work Notice on houses outwith the HRA for amenity purposes only. If the situation is sufficiently severe the Local Authority should designate an HRA.” – Scottish Lands and Estates

Q18 Should local authorities be able to issue repayment charges for work done on commercial properties, in the same way they can for residential premises?

3.58 Over half the respondents answered question 18 (62%), including most of the responding local authorities (81%). Most of those responding answered ‘Yes’ (82%) with particularly strong support from RSLs and local authorities (92%, 90%).

3.59 Comments in support included: that this was a major concern when dealing with tenements where the ground floor commercial premises carry liability for the major proportion of cost to repair. With a repayment charge, the local authority could give the proprietor time to pay the account, and get necessary works underway - the alternative would be to take every commercial proprietor to court and put many out of business.

3.60 Another respondent observed that the current climate had increased the problem of securing financial commitment from commercial property owners, many of whose shops were currently empty. A repayment charge over the title would allow interest to be charged which might act as an incentive for the commercial proprietors to seek their own finance to progress the work themselves. ALACHO believed that common works required by legislation should be recoverable according to the title deed provisions and pursued accordingly, and repayment orders might help to do this.

3.61 More generally, local authorities called for repayment charges to be amended so that local authorities could determine the payback period, based on the size of the debt - 5, 10 or 15 years might be more appropriate than the present 30 years. It might also be beneficial for the council to be able to seize and then sell the property in order to recover costs much earlier.

3.62 Question 19 addressed the issue of property factors.

Q19 What action, if any, do you think the Government should take to make it easier to dismiss and replace property factors?

3.63 Just over half the respondents answered question 19 (53%), including most of the RSLs and local authorities, but less than a third of the other respondents.

The consultation set out four options; some respondents referred directly to these, while other responses could be allocated to options. Some responses referred to more than one option.

- 3.64 A number of respondents stressed that factors should only be dismissed if the intent was to replace them - if the focus were on ease of dismissal, it could become even harder for common repairs to be carried out.
- 3.65 Over a third of responses, from a range of different respondent types, favoured **Option 1: “to take no action**, particularly as the industry is undergoing major changes at the moment as the Property Factors (Scotland) Act 2011 is brought into force.”
- 3.66 Two local authorities were concerned about factoring arrangements in new build developments, stating that some builders tied new owners through their title deeds, even if the owners were not satisfied with the services provided. However, Homes for Scotland explained the normal procedures for the appointment of factors and expressed the view that two years between the handover of the last unit and any decision to ‘switch’ would allow performance to be properly judged. However, they suggested that clear guidance was needed on the majority required to make a change, the formal process and mechanisms needed to take such a decision, and any default positions in case of no show/ no vote – a suggestion which has relevance to Option 2.
- 3.67 A fifth of responses to Q19 favoured **Option 2: “to issue guidance, outlining best practice when placing provisions in title deeds on property factors and advice to homeowners on dealing with factors and switching factors”** with a few favouring option 2 in conjunction with options 3 or 4.
- 3.68 A fifth of responses favoured **Option 4: “to amend the Title Conditions (Scotland) Act 2003** so that, for example, a simple majority (rather than two thirds) of residents can always dismiss a property factor, regardless of what the title deeds say, once the manager burden has expired.” One local authority suggested that support should also be available for owner associations to actively manage their own properties. Consumer Focus Scotland commented that Option 4 would bring the rules into line with those for home owners whose title deeds did not set out a procedure for dismissing a factor, and would ensure that all homeowners had the same rights when switching their property manager. They also advised that when amending the Act 2003 the definition of ‘property manager’ should be the same as that used in the Property Factors (Scotland) Act 2011.
- 3.69 Only three responses favoured **Option 3: “to change the provisions on manager burdens** so that they have effect for shorter periods,” as one in a combination of options. One suggested that options 3 and 4 offered the greatest flexibility.
- 3.70 A fifth of responses were more concerned with buildings that had no factoring arrangements. Buildings without factors were felt to represent the greatest challenges to local authority actions to rectify poor building maintenance - it would be beneficial if all common areas had an appointed approved factor.

- 3.71 One of the 'other' group suggested limiting contracts between factors and owners to a maximum one year but making it a requirement that there must always be a factor in place, incorporating this into existing legislation. One of the RSL sector respondents commented that property factors had a potentially significant role in relation to any new energy efficiency standards - without a property factor or equivalent, how would works be agreed with residents, contractors be appointed, works be funded and how would payments be recovered? However, ALACHO stated that:

“It is not clear that poor property factors are a significant issue in promoting improvement works, especially relating to energy efficiency, though ALACHO would be happy to see any evidence on this. Where this is an issue a simple majority or minimum 50% of owners should be sufficient to remove (although some Title Deeds may have different provisions, allowing landlords to retain factoring responsibilities where as little as one property remains in their ownership.) Building unanimous or even majority consent is likely to be a bigger issue in common blocks , though enlightened and pro-active factors can play a key role in generating this consensus.”

- 3.72 Finally, Consumer Focus Scotland drew attention to the need for responsibility for its consumer guide on the management of tenements in Scotland, last revised in 2009 and some other property-related guides to be transferred, perhaps to the Scottish Government.
- 3.73 Questions 20 to 22 addressed ways to raise the importance of energy efficiency for tenants and owners, the introduction of an energy efficiency standard for existing private housing, and enhancements to Energy Performance Certification.

Q20 What action can be taken to raise the importance placed by owners and tenants on the energy efficiency of their properties?

- 3.74 Most respondents answered question 20 (79%). Key issues were the need for improved information about existing homes, and awareness raising. Other issues included regulation to require information at point of sale or renting and incentives. Comments which related to improvements to EPCs were considered in the analysis of Q22.
- 3.75 Other calls were for **improved information on running costs**. It was suggested that the new private sector Tenant Information Packs could empower tenants to ask landlords about the energy efficiency of their homes and any plans for improvement. At present the housing shortage meant that private rented tenants tended not to ask for EPCs and that for many this was a choice that would be difficult to exercise. An RSL suggested that the effectiveness of Energy Reports in Home Reports in changing attitudes should be evaluated. Other respondents recommended that sellers or utility companies should be required to provide information about recent energy costs for a property, and there should be free energy assessments for home owners.

- 3.76 There were calls for **awareness raising campaigns and marketing**, with many suggestions similar to those for the NRP, including clear branding. Others concerned messaging: to ‘normalise’ energy efficiency as with the smoking ban and seatbelts campaign; ‘smart’ marketing highlighting lifestyle benefits; to change the emphasis from global warming to improved comfort and fuel bills; and the comment “too much information, so many messages.”
- 3.77 Some called for requirements for every home to have a current EPC, a Building MOT, or for a charter for private housing. More commonly, suggestions were for **requirements at point of sale or renting**, including calls for owners to be required to meet a certain condition prior to sale or rental and restrictions or premiums on transferring unimproved property. Other comments concerning EPCs are discussed under the analysis of question 22.
- 3.78 The most commonly mentioned **incentive** was discounted council tax - the discount might be based on the EPC rating, or linked to measures taken to improve energy efficiency; other suggestions for incentives were reduced stamp duty / new Land and Buildings Transaction Tax, and a pence per unit reduction in energy costs based on the EPC rating.

Q21 Should the Scottish Government introduce minimum energy efficiency standards for private sector housing?

- 3.79 Most respondents answered Q21 (87%). This was an open question, presented without ‘Yes’ / ‘No’ options. LSA reviewed the content of all the responses and found that over half supported minimum standards for the private sector (57%); both RSL and local authority groups were more supportive than the private sector. A third either definitely disagreed, gave only strongly qualified agreement, suggested an alternative approach or appeared undecided (30%).

“There is a good case for the application of minimum standards....
However, we are under no illusions as to the challenges of implementation”
– ‘Other’ group

- 3.80 Compulsory minimum standards were supported by the WWF Campaign:

“alongside attractive financial incentives, a basic standard of E on the Energy Performance Certificate scale should be introduced by 2015 at the point of sale or rental. There is no reason why substandard properties which condemn people to high bills and fuel poverty should continue to be on the market. Regulation will drive demand for energy upgrades, and give a meaningful value to the energy performance of homes. Voluntary programmes are not delivering the pace and scale of change required.” - WWF Campaign text

- 3.81 There was some support for creating a level playing field across tenures. A quarter commented on the **nature of standards and their application**. Suggestions varied in ambition: a non-mandatory goal with a programme of incentives to encourage implementation; a matching of the 2018 England and Wales standard which would ban the rental of houses rated F or G unless all

Green Deal measures had been installed; or a single standard of EPC band E from 2015 and EPC band C from 2020 with sufficient financial support and advice through NRP. Some called for exemptions for listed buildings and properties in conservation areas.

- 3.82 A fifth were concerned about the **impact on the housing market and cost of enforcement**. The minimum standards could further slow the housing market by adding costs at point of sale or rental and liabilities for purchasers, while private landlords might increase rents or withdraw homes from the market: estate agents and surveyors should be involved in an impact assessment. There were concerns about how councils would resource enforcement, and for financial hardship amongst low income property owners.

“... yes, in principle. The imposition of standards to only that minority of Scotland’s housing stock which constitutes the social rented sector would essentially be pointless.... enforcement of even minimum standards is an altogether different proposition, which if attempted without sufficient resourcing would be equally ineffective.” – ALACHO

- 3.83 Some respondents raised **technical** considerations. Minimum standards could lead owners to install inappropriate insulation resulting in condensation problems. Some suggested that the work should be carried out by accredited tradespeople. Others pointed to the inaccuracy of RdSAP for traditional buildings, and the need for exemptions for certain difficult to treat or historic properties. However, only one organisation suggested demolition as an appropriate solution.
- 3.84 Some suggested **alternatives to minimum standards** including: a graduated tariff with higher costs per kWh if demand exceeds a local average, an enhanced repairing standard to improve private rented properties; and the use of LBTT as an incentive. One local authority suggested that an amendment to the tolerable standard would be a way to introduce minimum energy efficiency standards for private sector housing.
- 3.85 Others discussed **procedures**. There were calls for monitoring to be facilitated by the HEED database and a central database of Home Reports. The conveyancing process could be used to police standards for owner occupied housing but policing the private rented sector would be more difficult. A different approach might be needed in tenemental housing and mixed tenure blocks, but this should not delay enforcement of minimum standards in stand-alone properties.
- 3.86 Other issues included a call for consideration of the balance between an owner’s right to ‘quiet enjoyment’ of their home with the national interests of tackling fuel poverty and climate change. Waterwise called for the standards to cover water efficiency, with maximum flow and flush rates.

Q22 How could we amend EPCs to make them a more useful tool for influencing behaviour change to improve energy efficiency?

- 3.87 Most respondents answered question 22 (73%) and many gave similar answers to those for Q20. Just over half suggested improvements to EPCs

particularly the inclusion of likely running costs. Some suggested ways to raise the profile of EPCs including linking to incentives. There was also some general criticism of EPCs and RdSAP.

- 3.88 We note however that most of the recommendations have been superseded by the revised **format for EPCs**, issued in October 2012, which includes a recommendations report that includes information under the following headings: Estimated running costs for this home, broken down by heating, hot water and lighting; potential running costs if specified improvements were undertaken; indicative cost of improvements, typical annual savings, and impact on the energy rating, plus further detail of each type of improvement; signposting to the Energy Saving Trust for free, impartial advice and to the Green Deal.
- 3.89 Some suggested that EPCs should contain even more information such as: likely energy costs based on different scenarios/family profiles or for explaining the standard occupancy assumed; an explanation of the cost benefits of each improvement on a weekly basis.⁷ Others suggested the inclusion of information about: the energy consumed by appliances; landlord obligations; approved installers; current performance against 2020 target.
- 3.90 There were many recommendations to **raise awareness of energy performance ratings**, such as including the EPC rating in advertising, and about the availability of the certificate and recommendations report. Most of these recommendations have been dealt with in the 2012 amendments to The Energy Performance of Buildings (Scotland) Regulations which implement aspects of the re-cast European Energy Performance of Buildings Directive (EPBD). These include a requirement, whereby from January 2013, the energy performance indicator from the EPC must be clearly stated in any advertisement in commercial media.
- 3.91 There were also calls for a national EPC database, with data from EPCs available to allow energy advisors to be more proactive and provide tailored advice to individual households, while one of the responses to question 20 called for quality control of EPCs, randomly checking the accuracy of EPCs, with penalties incurred where incorrect. Again, there have been some recent changes associated with the re-cast EPBD Regulations, which may meet some of these points.
- 3.92 Other ways to raise the profile of EPCs would be to link EPC bandings to: council tax and LBTT discounts; financial support for measures; lower mortgage charges, fuel tariffs, or insurance; or to a compulsory energy condition prior to rent or sale.
- 3.93 A few respondents criticised the **reliability** of EPC ratings, for: not recognising the value of renewable electricity generated nearby; a lack of transparency of the input data and information analysis; the potential impact on investment

⁷ Costs and savings are given over three years.

decisions of over-stated savings from insulation or heating due to inappropriate assumed comfort levels; inability to input the correct U-values for certain measures; inaccuracy of surveys, calling for closer scrutiny of surveyor training. One asserted that EPCs discriminate against properties in off-gas grid areas where heating oil, electricity, solid fuel and LPG were more expensive than natural gas, given that EPC ratings would be used to prioritise activity under ECO and limit availability of the RHI and FITs.

- 3.94 Others suggested that smart meters might be more effective than EPCs in changing behaviour, and that changing behaviour was likely to yield greater savings than forcing upgrades.

Q23 Are there other key principles that we ought to consider when looking at the possible introduction of regulations?

- 3.95 The consultation identifies the following principles: fit with incentives; clear standards that are appropriate, financially sustainable, and equitable; and appropriate timing. Most respondents answered question 23 (69%).
- 3.96 A third of them did not suggest other principles, but **expanded on principles identified in the consultation**, mostly concerning potential financial hardship for low income households and allowing sufficient time for the private sector to prepare for change. An RSL called for consideration of asset rich / cash poor owners and avoidance of discrimination against those in most need (elderly, disabled, fuel poor). A common call was for clear timelines and milestones, with sufficient preparation time for homeowners and PRS landlords, with extended timescales for landlords who own several properties. [Again, in response to this question, some queried the feasibility of the Green Deal.]
- 3.97 There were calls for **awareness-raising** for all stakeholders, including local authorities, the conveyancing industry, private landlords and letting agents as well as householders, on how and when the regulations would be brought in and the circumstances in which they would apply.
- 3.98 Other key principles were: that regulations should be **practical and enforceable**, there should be **no confusion with other regulations**, and there should be an **impact assessment**, including costed case studies. Quality issues might be addressed by the use of suitably accredited energy assessors, advisors, and tradespeople, or by some body to monitor that work which was carried out actually met the design aspirations. Particular difficulties were associated with securing improvements in tenemental housing where the sale of one flat might not lead to work being enforced in communal areas. Some called for clear penalty structures with teeth, others for the incremental introduction of requirements, aiming to secure an initial acceptance of the principle of a minimum standard, then gradually increase it.
- 3.99 Several organisations volunteered assistance to the working party to develop regulations.

Q24 How could regulation be used to support the uptake of incentives?

- 3.100 Two thirds of respondents answered question 24 (67%). There was considerable diversity of views, but over a third asserted that incentives and promotional campaigns were preferable to regulation and that regulations should only be introduced if they fail.
- 3.101 Uptake of incentives could be supported by a comprehensive communication and enforcement regime. Whilst some thought that no new regulation was required, others suggested using regulation only if awareness-raising fails to improve uptake of incentives. Several referred to uncertainty about the Green Deal/ECO and recommended that any requirement for energy efficiency measures should be related to the availability of incentives.
- 3.102 Other common responses were that regulation in itself would drive demand for incentives, and that there should be a link to Council Tax or LBTT discounts. One queried whether Scottish regulation might affect eligibility for ECO. Another highlighted the need to continue the arrangement with utilities whereby council tax discount was cost neutral to councils, on the change from CERT to Green Deal / ECO.

Q25 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?

- 3.103 Two thirds of respondents answered question 25 (67%). The options referred to were: Option 1: required specific energy efficiency measures; Option 2: a simplified version of SHQS energy efficiency requirements; Option 3: minimum EPC score or U-value; or Option 4: carrying out recommendations from Energy report at point of sale or rental.
- 3.104 Some thought that, as yet, it was too early to judge, or disagreed with a mandatory standard. Others made generally supportive comments, some favouring a combination of options, but didn't select an option. Some respondents felt that they needed more detailed proposals before they would be able to comment.

“The introduction of GD and ECO are being delayed and criteria are being changed, RdSAP/EPCs are inadequate and being changed. So some key aspects of the new regime are in flux. We at least need to wait and see how they settle down and how successful they are before thinking about what type of regulation will be appropriate or not” – Scottish Lands and Estates

- 3.105 **Option 3** was the one most favoured by respondents, as being the simplest to explain and administer, allowing different treatments to different property types, and cross-sectoral comparison rather than the confusing dual standards of SHQS and EPCs. It would provide information about running costs to buyers / renters, and would highlight what improvements should be carried out.

- 3.106 Additionally, the regulation should be designed so the standard (and programmes of support) could be raised over time. It could be accompanied with guidance on the likely measures required for specific housing types. Financial support was advocated for disadvantaged groups, and for rural homes where costs were higher.
- 3.107 Other views were: that Option 3 might be used for all homes, with Option 4 applying to private sale or rental; that there should in addition be a financial cap on necessary improvements, or that cost limits should take into account the availability of ECO funding for more expensive measures which would make these cost effective. The standard might also include consideration of ventilation levels, cost to heat, dampness and mould levels, and standards of repair. There was only one recommendation that the standard should be expressed as minimum U values, translated to insulation thickness for different constructions.
- 3.108 Two of the objections to option 4, made by RSLs, were that to renew components ahead of their planned life cycle would not achieve value for money and that it might require them to undertake further improvements to a high energy rated property when investment should be prioritised elsewhere.
- 3.109 A few respondents suggested alternatives to the options. One advocated moving retrofit standards towards higher airtightness and insulation levels such as those of the Passivhaus retrofit standard, EnerPHit. Another suggested that owners should implement the checklist 'Looking after your home - a hierarchy of needs'.

Q26 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?

- 3.110 Most respondents answered question 26 (81%). Most of those responding answered 'Yes' (78%), with much weaker support from the 'other' group. Nearly a third simply said 'Yes' without further comment.
- 3.111 A half said 'Yes' and offered comments. Only a few of these were strong reservations about the practicality of the proposal. Others simply offered comments, which were split equally for and against. Less than a tenth said 'No.' However, there appeared to be some confusion about what this question meant. Few directly addressed the question in terms of standards that take account of the energy efficiency capacity of the property and its location. Most of the supportive comments were in terms of having the same standards in the social and private sectors.⁸
- 3.112 Just under half supported the principle of similar treatment to that proposed for the social sector.

⁸ Although this issue was raised in relation to mixed tenure blocks in the consultation text preceding questions 26-28, it is the subject of Q 27 rather than Q26.

- 3.113 Of those that simply commented, half were broadly supportive, whilst half raised concerns about financial returns to owners, the potential return in value, and confusion to the public of varying standards especially if different standards were set for the same property type in different locations.
- 3.114 One of the 'other' group organisations thought that using the EESSH proposal could establish a level playing field across sectors, but was concerned about possible confusion arising from having different standards for different house-types. They also questioned whether the proposed standard was sufficiently challenging to meet the statutory climate change and fuel poverty targets. Another supported the link with fuel type and property type, albeit with exemptions associated with cost-effectiveness, upheaval, and consideration of period features.
- 3.115 Few addressed setting standards on the basis of location, but one respondent called for a rural weighting, with lower levels of improvement targets.
- 3.116 Comments from the private sector and the main warranty provider addressed value for money and life cycle cost considerations, impact on value and house sales, and consideration of any contractual restrictions imposed by the mortgage provider or the property factor. Another focussed on cost-benefits:

“Any regulation must be practical and costed. Forced improvements that are costly and ineffective in terms of the carbon reduction in relation to the payback of the capital investment received would be extremely unhelpful.”
– Homes for Scotland

Q27 If you agree with Q26, should houses of the same type in the social and private sectors be expected to meet the same standard?

- 3.117 Most respondents answered question 27 (76%). Most of those responding answered 'Yes' (78%). Many referred to the answer given to question 26, and the intention of most comments to question 27 is adequately covered by the analysis of those responses. Other comments concerned the **benefits of parity between sectors**, for instance where RSLs leased private rented housing to supplement their own stock, where there were property exchanges between public and private sectors, and for neighbouring properties in different tenures. One suggestion about the phasing of standards is included in the analysis of question 30.

Q28 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?

- 3.118 Nearly two thirds of respondents answered question 28 (64%). Responses were similar to Q10. Key issues were: learning from previous programmes; targeted funding; clear communication and use of trusted agents; flexibility and practical help in delivering improvements.

Q29 Should we consider additional trigger points to point of sale or rental? If so, what?

- 3.119 Most respondents answered question 29 (73%). Of these, over half answered 'Yes' (61%) and suggested additional trigger points. The most common trigger suggested was building work, with three types identified, listed in order of frequency: **applications for building warrant**, including any request for building warrant or planned improvement and work subject to building control - some would limit that to building warrants for major works; **major building work**,⁹ including renovation, extension, roof conversion, fitting of bathroom, kitchen, internal structural work, re-roofing; extensions, extensions or alterations to improve, major structural repairs; **refurbishment / renewal / rehabilitation**.
- 3.120 Other trigger points related to **controls on rented properties**: landlord registration; HMO licence application; and re-issue of EPCs.
- 3.121 Other trigger points which were less frequently mentioned were: boiler replacement, window replacement; local authority action not specifically triggered by energy efficiency; application for planning consent; adaptation for accessibility (with extra funding); mixed tenure repairs; at periodic intervals in the life of EPC; at point of purchase; building MOT inspection; application for grant assistance.
- 3.122 There were some comments on trigger points associated with building work: care would need to be taken to explain this better than in England where the 'conservatory tax' proposal has been abandoned;¹⁰ energy efficiency regulation at the time of extensions could be attractive to homeowners if incentives for the measures were available, particularly if it saved double costs, such as scaffolding. Continuous promotion of the benefits of improvements and availability of incentives could increase take up between point of sale and rental events, avoiding such events becoming critical due to unplanned expenditure. 'Light touch' consequential improvements¹¹ provisions were introduced in the 2010 revision of building regulations and it was suggested that a review of the impact of these provisions should inform deliberations. However, some respondents were concerned that any requirements for improving energy efficiency should not be a disincentive to undertaking home improvements as this would damage the building industry.
- 3.123 Third sector organisations reported that landlord representatives had raised questions about insulation works not being eligible for tax relief, while other improvement works were eligible, and called for a consistent approach.

⁹ Some of which would not require a warrant.

¹⁰ A mandatory scheme that requires energy efficiency improvements at the time of building a conservatory, replacing a boiler or installing new windows.

¹¹ Consequential improvements are requirements for improvements at the same time as certain types of building work to existing buildings. The guidance in 6.2.9 'Extensions to the insulation envelope' of the 2010 revision of the Domestic Technical Handbook refer to the required insulation standards for extensions being related to the U-values of the external walls and roof of the existing building.

3.124 A quarter of respondents answering Q29 agreed with trigger points only at sale or rental, or preferred incentives and information programmes to avoid adversely affecting the housing market, or disagreed with regulation.

Q30 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?

3.125 Most respondents answered question 30 (76%). Several queried the format of the question and a high proportion of respondents only gave comments (39%). There appeared to be some confusion of two issues – the timing of rollout and whether similar timings should apply to both sectors.

3.126 Most of those answering Q30 supported phasing, with strongest support amongst the private sector, ‘other’ and RSL groups; less than a quarter supported introducing standards all at once.

3.127 Where mentioned, most supported the simultaneous application of regulation to owner-occupiers and the PRS, which it was felt would minimise confusion, maximise publicity, help co-ordinate work in mixed tenure properties and area based improvement schemes, facilitate properties switching between tenures, and provide a level playing field across the private sector. One respondent suggested the PRS should not be targeted first, due to the increasingly important role it is playing in meeting housing need, whereas some thought it should be universally applied, but phased, starting with the PRS.

3.128 One respondent supported simultaneous introduction with the new standard for the social sector, otherwise RSLs could sell their worst properties to the private sector. One suggestion for **the phasing of standards** had been given in response to question 27:

“We agree they should meet the same standard but the timescale should be different. We would expect social housing to meet the target first, then private sector landlords and finally owner-occupiers. Having the same standard for all tenures will allow contractors to develop their offering in well managed social housing with other tenures benefiting from this skilling up of industry. In addition it supports action in mixed tenure blocks as all tenures need to meet the same standard – albeit at different times. It may encourage owners to join in social landlord programmes of work.” – ‘Other’ group

3.129 Some respondents referred to the options given in paragraph 2.75 of the consultation – they mostly favoured starting with the homes that have the lowest EPC ratings or incrementally increasing standards over time - hardly any favoured targeting areas that had already had area-based incentive schemes. However, one respondent remarked that phasing by energy efficiency ratings would only work where all the stock had an energy efficiency rating, but there was neither the time nor resources available to survey all

stock. One suggested using BRE's Ecohomes XB to benchmark homes, to establish incremental improvements starting with worst performing homes.¹²

- 3.130 Suggestions for phasing incremental standards included a requirement for compliance with a minimum standard by a particular date, with a long stop date for every property to comply with a higher standard. Another suggestion was to link the minimum standard to fuel poverty and climate change targets, with milestones in 2015, 2020 and every 5 years.
- 3.131 Various types of phasing were advocated for rented property: year on year increases; or more generally varying standards over time; aiming at all parts of the housing sector having the same standards by 2020; or relatively easily achievable targets for all for 2020 then 5 year milestones with tougher targets. While some thought hard-to-treat properties might require different or lower standards, including a rural weighting, another suggested that a phased roll-out would give opportunity to work up examples appropriate to different housing types including cost effective solutions for 'hard-to-treat' properties.
- 3.132 There was little support for regulation only in those areas where programmes had already taken place, or more generally by geography or by tenure. However there were arguments in favour of area-based improvement schemes prioritising fuel poor people and targeting the poorest performing homes.
- 3.133 Some suggested other bases for phasing. Homes for Scotland was alone in its proposal to prioritise the amount of carbon saved per pound spent so the earlier phase would address quick wins. 'Other' group organisations advocated the application of standards only at the point of sale or rental, where there were existing mechanisms (landlord registration, conveyancing process) rather than applying standards for all housing from a set date which would require an entirely new process and delivery mechanism. A local authority suggested phasing linked to council tax bands, while one of the 'other' group organisations suggested phasing by the age of property. A private sector respondent suggested the introduction of a voluntary building MOT scheme to empower owners to undertake appropriate repairs and maintenance, ahead of any regulation.
- 3.134 Many respondents identified practical considerations of information and timescales to allow planning of work, and supply chain pressures: a phased approach would allow owners and landlords time to prepare for regulation and allow industries time to build capacity.

¹² Ecohomes XB is designed to assess and monitor the environmental performance of housing stock, track improvements made during routine maintenance and minor improvements, and provide a constant monitor of performance against a benchmark figure. A default SAP rating, based on property age and type, is supplied where an assessment hasn't been undertaken.

Q31 What other issues around enforcement do we need to think about when considering how different approaches to regulation might work?

3.135 Over half the respondents answered question 31 (58%). Half raised the issue of resourcing of enforcement; a quarter queried practicalities of enforcement. Many comments were very similar to those regarding local authority powers in Questions 13 – 18.

“ALACHO accepts that some policy issues are sufficiently serious to merit an enforcement component, and that the social and environmental consequences of fuel poverty and carbon emissions come into this category. Thus, our concerns are not about enforcement per se (although legitimate issues of cost related feasibility, and the diminution of individual property rights in favour of collective benefits may be articulated) but about the costs associated with this and the capacity of local authorities to cope if, as seems likely, the burden of enforcement falls on them to deliver. Introducing enforcement measures which people come to believe have little or no consequence is clearly futile. Unless the intention is to properly resource enforcement it should not be introduced.” – ALACHO

3.136 Local authorities’ comments included consideration of: the work load impact on small local authorities; the monthly numbers of sales and rentals; the resource implication if there were a requirement to monitor energy efficiency compliance and a system of applying for exemptions; and the problems of cost recovery. Others queried the capacity of local authorities (or other publicly funded bodies) to carry out assessments of energy performance as part of the landlord registration process.

3.137 Again, some emphasised the need to consider the condition of the existing structure – there would be no point laying loft insulation if there was severe water ingress and the roof required to be replaced. Others observed that many home owners could not access the necessary funding for improvements, particularly in the current economic conditions, and regretted the absence of a national lending unit.

3.138 Other issues were: the nature of penalties; ensuring the quality of the works and materials employed, and the efficiency of renewable energy systems; and legal issues of ownership of the property or problems gaining access.

Q32 a) Do you think that sanctions on owners should be used to enforce regulations? b) Should owners be able to pass the sanction or obligation on to buyers?

3.139 Two thirds of respondents answered question 32 a) (66%); slightly more answered 32 b) (69%). Of those answering question 32, most favoured sanctions on owners (65%), but less than half thought the sanction or obligation should be passed on to buyers (46%). Even amongst those who answered ‘Yes’ there were many comments advising caution.

3.140 Many comments concerned the **negative impact on the housing market or the action of market forces**, again with preference for the use of incentives and support, and calls for assessment of whether the desired outcome would

be better met by allowing consumer choice to influence the market - sanctions could have a negative impact on house values. One view was that passing on sanctions to the purchaser would have a detrimental impact on the provision of mortgages as the value of the improvement would either be fully retained by the funder or retained pending completion of the required work.

- 3.141 Other opinions included the view that regulations would worsen **inaction on empty homes**, where people had bought properties in disrepair with the intention of doing them up but then been unable to do the work. Another respondent warned that impacts were likely to be most damaging in areas of the country that were not doing well economically (hard-to-treat homes in remote rural areas). Some thought that in the PRS either rents would have to be increased or the landlord would have to sell. A few respondents thought market forces would operate so that the value of non-compliant properties would reduce, resulting in a self-policing system. Some argued for **incentives** rather than sanctions, working in tandem with market forces. Again, several respondents suggested the incentive of LBTT rebates linked to energy efficiency.
- 3.142 Arguments for passing on sanctions to buyers included purchasers recouping the benefits of energy efficiency, and establishing a strong link between market value and energy efficiency. Without upgrades, purchases might be at a lower price and the purchaser could fund upgrades in a cost neutral way; otherwise, opportunities to purchase old properties to develop would become non-existent. However, regulation should only allow passing on the burden at the first sale - the buyer should not be able to sell on without improvements.
- 3.143 Some again raised the need for **resources for enforcement**. The other main issue was the **mechanism of sanctions**, which tended to argue for having work done before completion, or before occupation - once a property becomes occupied, policing would be impossible. One respondent queried whether sanctions would be legally possible. Some proposed the 'incentive' for landlords of non-compliance being linked to assessment under the Fit and Proper Test for Landlord Registration.
- 3.144 Some addressed **time limits** for work to be done, such as provision to allow people to sell properties they were unable to improve with enforcement of compliance within a 12-month window. Others suggested limiting compliance to 6 months. One of the 'other' group organisations asked for consultation with valuation surveyors who would need to be aware of the possibility of cancellation of sales due to properties not meeting energy efficiency standards, with a potential impact on their PI insurance.

Q33 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?

3.145 Most respondents answered question 33 (68%). The most popular date suggested was 2015, predominantly by organisations in the 'other' group, followed by 2020 which was mostly suggested by RSLs and local authorities.

3.146 Half of the respondents who suggested 2015 offered justifications. These included alignment with the Fuel Poverty statement target of 2016, and with the targets set for CO2 reduction for 2020 and 2050.

“Given increasing levels of fuel poverty and rising energy costs, we would suggest that regulations should be applied as soon as possible during or after 2015, as a necessary part of the process of the Scottish Government meeting its existing fuel poverty target. However, we also appreciate the need for the delivery of regulations to be effective. We would therefore suggest that the working group should look explicitly at the processes which need to be put in place, including time for promotion of the changes, and should make recommendations on the timing of regulations on that basis.” – Existing Homes Alliance, Age Scotland, Consumer Focus Scotland

3.147 However, response was split, with as many comments raising issues and objections as all the suggestions for dates. Issues were mostly raised by local authorities and private sector organisations.

3.148 There were calls to take account of **progress of programmes** which were about to get underway, and of the **health of the economy and domestic property market**. ALACHO counselled caution:

“Scottish Government is right to be cautious about the speed with which regulation might be introduced. It is wise to allow for further discussion on timescales within the proposed working group which will consider this issue, and to take into account not only progress with the various initiatives and programmes which are about to get underway, but also the health of the economy and domestic property market, which will play a crucial part in determining participation rates in home energy efficiency improvement schemes. ALACHO is content that firm timescales should only be set following these deliberations, and as and when appropriate and deliverable...”

3.149 There were several comments regarding **uncertainty about the Green Deal**, and calls for analysis of its progress, including a suggestion that elements of the Green Deal might not fulfil their objectives and that the introduction of regulation should be linked with more effective funding mechanisms. However, some third sector organisations suggested regulation should come into force from 2015 - in part to drive demand for the Green Deal.

- 3.150 More **lead-in time** was needed for implementation of an enforcement system delivered through local authorities which penalises owners - owners should be allowed to implement energy efficiency measures as their resources permitted; a few called for landlords with several properties to be given longer to comply. The time taken to achieve the SHQS by the social rented sector indicated how much time the considerably more diverse private sector would require. An RSL sector organisation advised that the data collection and management time required would need to balance the outcome, while self-regulation with benchmarking would be welcome.
- 3.151 Some referred to the **key dates** set out in paragraph 2.81 of the consultation (2018 regulation of the PRS in England and Wales; 2020 EESSH implementation; 2020 and 2050 climate change targets) and proposed commencement after implementation of the EESSH, or synchronising regulations for all sectors.
- 3.152 Private sector respondents were concerned about a **lack of consumer awareness about the Green Deal** and suggested homeowners should be given additional lead time to introduce energy saving measures voluntarily with access to grants and information, including how to find a suitably skilled and accredited contractor. There were calls for pilot work to ensure workable solutions that deliver the stated levels of energy efficiency benefits. There was a need to ensure there would be sufficient capacity in the repair and maintenance sector, and within local government for enforcement.
- “Market conditions must take priority and at this time the market is still extremely fragile.... it is crucial that the Scottish Government think carefully about the timing of any regulation and consult widely with estate agents, surveyors etc., about the state of the market before making decisions on timing.” – Homes for Scotland
- 3.153 The Existing Homes Alliance called for particular consideration of sitting tenants in **private rented properties that do not have an EPC** – such tenants were particularly vulnerable, being reluctant to risk animosity on the part of their landlord by requesting that their home meet the standard.

4 **ANALYSIS OF RESPONSES: FINANCIAL MARKET TRANSFORMATION**

- 4.1 Questions 34 to 37 addressed the ways in which financial institutions could be persuaded to recognise the value of energy efficient homes. This included: legislative and policy levers to transform the valuation of housing to take account of energy efficiency and sustainability, changes to survey and lending practice, challenges to such valuation, and Scottish Government action to encourage recognition of the value of sustainable homes.
- 4.2 The Council for Mortgage Lenders did not directly respond to the questions but made a general statement which largely relates to questions 35 and 36.

Q34 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? b) Can you suggest any other ways to help transform the market for more energy efficient, sustainable homes?

- 4.3 Over half the respondents answered Q34 a) (60%); the response was divided with over half answering 'Yes' (55%), who were mostly in the RSL and local authority groups. Over a third answered 'No' (36%), with high proportions of the private, professional, and 'other' groups.
- 4.4 Over half the respondents answered Q34 b) (60%), with a low response rate in the RSL group. Over a quarter of these advocated **incentives** in the form of links to council tax and / or Land and Building Transaction Tax.
- 4.5 A few commented on **valuation and mortgage lending practice** to take account of income from energy generating technologies or savings due to energy efficiency. Some referred to RICS as being best placed to comment, but RICS was in the process of reviewing its own guidance on valuing sustainability in homes and did not respond to this question. Some pointed to the value of housing being determined by broader supply and demand factors, not running costs and that the EPC rating does not yet impact on value. Some called for green mortgages linked to lower utility costs. However, most pointed to a lack of incentive to invest in energy efficiency without a change in valuation practice, or rent setting in the private sector.
- 4.6 Some suggested other measures: **awareness raising, demonstration, and market research**. Suggestions included expanding the EST Green Homes network to include many more energy upgrades of existing homes - and showcasing energy efficiency upgrades of buildings by public, private and third sector employers; and market research to establish what customers were looking for and what would influence their decisions. Other suggestions not mentioned in earlier questions¹³ included the 'Home Energy Score' used in America which compares the home with other similar homes in the surrounding streets to encourage 'environmental competition' between neighbours; and a TV programme on finding homes called 'Energy efficient, Energy efficient, Energy efficient!'
- 4.7 The private sector called for measures to boost **new build**: a new buy incentive; making more green sites available for one-off new build energy efficient properties, and speeding up the planning process for the building of such houses.
- 4.8 Some suggestions concern reserved matters, such as lobbying HMRC for fiscal incentives; tax relief for owners to off-set the costs of maintenance; tax breaks or reductions on insulation, energy, monitoring and micro-generation products; and VAT reduction or zero rating on improvement works to existing

¹³ See questions 3, 20, 23.

buildings. There could be mandatory contributions to a sinking fund for repairs or improvements at point of purchase as a condition of mortgage lending.

- 4.9 There was considerable pessimism about funding options, particularly about the Green Deal because of delays in its introduction, high loan costs, and adding costs to house sales, and uncertainty about future fuel bills. One private sector respondent commented that little thought had been given to asset rich, cash poor property owners and that it was unlikely that this group would wish to re-mortgage for energy efficiency paybacks that might take years to materialise.
- 4.10 The Chartered Institute for Housing (CIH) considered faith in equity release to be misplaced, with few appropriate products available even when the housing market was buoyant. CIH considered that home equity would remain largely untapped without a national lending unit to provide loans to home owners for repairs, improvements or adaptations that would be repaid on sale. This might prevent social landlords from achieving the SHQS in mixed tenure blocks, and affect the ability of home owners to meet minimum standards.
- 4.11 Set against the vision of beneficial market transformation whereby consumers would realise the value of energy efficient homes, invest in improving their own properties, and consider energy efficiency when buying new homes, was a concern from one of the 'other' group organisations, that fuel-efficient housing would attract a premium, either on rents or house prices, that would widen inequalities by making such housing less affordable.

Q35 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?

- 4.12 Over half the respondents answered Q35 (56%).
- 4.13 The Council of Mortgage Lenders discussed lenders' consideration of disposable income, noting that the FSA consultation on responsible lending rules (consultation closed November 2012) included proposed requirements for lenders to verify income. However, with regard to income from new technology or savings on energy bills:
- “Unless the savings are significant it is highly unlikely that they will materially impact on the amount which the customer can borrow. It should be emphasised that savings made through lifestyle changes cannot be considered as there is no guarantee that these changes and any benefit derived will be sustained. While energy efficiency measures are likely to have a positive impact on disposable income it has to be borne in mind that the repair, maintenance and replacement costs of some of the new technologies associated with energy efficiency can be significant.” – Council of Mortgage Lenders
- 4.14 Apart from the CML, issues raised across all respondent types were the training of surveyors and lenders, consideration of running costs and whole life costs, and the calculation of mortgage offers and valuations. However

several respondents thought consideration of income and savings would be impractical, have little effect, or would not be appropriate.

4.15 The most common call was for more specialised **training for surveyors** to value the monetary impacts of energy efficiency measures for occupants, together with increased awareness on the part of lenders. One view was that surveyors operated on comparators and this approach was unlikely to generate higher values unless there was a recognisable impact on council tax bandings or actual increased mortgageability of greener homes.

4.16 Many called for mortgage lenders to take account of reduced expenditure on energy in the **calculation of mortgage offers and valuation** of energy efficient housing as it would mean greater affordability for the household acquiring the property, or for a **discount on lending rates** based on the level of energy efficiency, both to buy a new home or to re-mortgage to release funds for retrofitting. Valuations were seen as a particular problem of new build, where the new home market had seen a fall in values over the last 4 years and there was no value recognition for greener homes and places. The private sector saw it as key both to get people demanding energy efficiency, and to persuade the surveying and lending community to recognise that a purchaser of a new or greener home was less exposed to rising fuel costs than in a second hand home. Consumer Focus Scotland pointed to research demonstrating consumer concerns about both energy and council tax bills, both of which should be taken into account by lenders. Also, in the affordable housing sector, affordability should consider energy costs:

“Meeting fuel costs are a key and volatile part of the assessment of the affordability of a home. It would be useful to explore a “full housing costs” approach to assessing affordability” – ‘Other’ group

4.17 Set against this, others described difficulties in accurate assessment of the value of energy efficiency measures. Some queried the value of certain technologies with steep depreciation rates, and pointed to equipment that was under-delivering and to maintenance and replacement costs that could impact negatively on the value of the home. Others referred to difficulties in establishing actual savings, given that SAP was based on assumed uses rather than actual spend. Also, income from new technology was not guaranteed, so it was difficult for lenders and surveyors to place a set value on it - there would need to be guarantees about income and minimum performance of the technology to enable mortgage lenders to take these into account.

4.18 In a free market economy only **the market would decide** if energy efficient homes should attract a higher re-sale value. There was nervousness amongst surveyors about the judgements they make on the value of a home, stemming from the risk averseness of lenders. Although savings on fuel bills could make a house more attractive, buyers might not be willing to pay a great deal more.

4.19 The Council for Mortgage Lenders also noted that **green mortgages** had been developed, but there were few lenders offering such products as the commercial benefits of doing so were not clear. There was also mention of

property purchase schemes, suggesting that the availability of the Open Market Shared Equity and MI New Home schemes¹⁴ should be restricted to properties with high EPC ratings.

4.20 Many respondents suggested **information** measures to raise the profile of energy efficient housing, such as projected FiT or RHI payments, inclusion of recent bills in Home Report packs, and benchmark comparisons with typical bills for similar properties.

Q36 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?

4.21 The consultation listed challenges: a risk-averse lending market with assessment based on household income, but taking little account of house condition or energy efficiency; lenders who operate across the UK not fully recognising Scottish-specific circumstances; uncertainty about how the Green Deal would be received and how it might affect property values; lack of information or proven examples of how an incentive structure could support behaviour change; and lack of familiarity with new technology such as heat pumps and solar PV.

4.22 Over half the respondents answered question 36 (60%), with a particularly high response rate in the professional group. A fifth of these respondents, including the RICS, thought the list was comprehensive or suggested that RICS and the mortgage lenders were best placed to answer this question. Other respondents raised further challenges: professionals' knowledge / awareness, consumer information, consumer perception and values, mis-selling and quality of installations, complexity of regulation and funding schemes, legislative impediments, and affordability.

4.23 Many comments addressed **attitudinal change**. As well as comments similar to those for question 35, there were calls for the Bank of England and the Scottish Government to encourage greater support by banks for lending for energy efficient homes, and for continued high level engagement with CML and RICS. The Energy Saving Trust drew attention to a forthcoming study of solicitors', estate agents', surveyors' and home buyers' attitudes to energy efficiency and small-scale renewables. According to this study, as well as the professionals' belief that home buyers were not interested in these issues, home buyers themselves reported that they had limited understanding of the potential benefits, had limited budgets, feared that technologies would become out of date, and that they did not envisage living in a property long enough to recoup long-term benefits. The CML did not believe that lenders or surveyors could lead consumer perceptions and values. WWF suggested

¹⁴ The Open Market Shared Equity scheme is administered by RSLs on behalf of Scottish Government. It allows first time buyers in certain areas to buy homes for sale on the open market, with a minimum 60% equity stake.

Homes for Scotland developed the MI New Home Scheme to allow creditworthy borrowers to access 90 to 95 per cent loan to value mortgages. Scottish Government supports the scheme through the provision of a guarantee to lenders.

there was a need to engage with householders and explore motivations to behaviour change that make people feel good about themselves and their actions - rather than just saving money.

- 4.24 Respondents identified a need to **build confidence**, following reputational damage by under-performing or over-stated benefits of new technologies, and by mis-selling. Consumers needed to have faith that their investment would deliver and to trust installers. A local authority referred to poor quality or inappropriate retrofit installations that had rendered properties below tolerable standard and depressed their value. There were also calls to raise awareness of **industry accreditation schemes** that provide assurance of high standards of work by suitably skilled and properly accredited contractors. One respondent suggested that technologies should only be installed if they had a proven track record and were supported by local maintenance contractors. There was a fear of **uncertainty** caused by any further regulation and the complexity of existing funding, with schemes that were subject to change. One respondent suggested that qualified professionals were baffled by the range of subsidies and technologies, and that the average householder would be confused. RSL, local authority, and professional respondents noted that **planning restrictions** limited both energy efficiency improvements to homes in conservation areas, and district heating systems in urban areas.
- 4.25 Other comments concerned **affordability**, for instance energy savings offset by increased rents, or negative equity making people unable or unprepared to invest in improved energy efficiency measures. While subsidies were needed to make measures affordable for people on low incomes, those with higher incomes might decide to pay penalties rather than undertake disruptive works.
- Q37 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? b) What further action is needed to influence consumers and the market?**
- 4.26 Sections 3.16-3.22 referred to: working with key partners to change perceptions and practice in lending and surveying; raising expectations through building standards; providing information, evidence and case studies of low carbon housing and insulation measures; researching how to encourage sustainable behaviours at the individual, social, and material level; a public information campaign on climate change; and the Greener Scotland website.
- 4.27 Two thirds of respondents answered question 37 a) (66%), with high response rates amongst the local authority and 'other' groups. Most answered 'Yes' (80%), including almost all in the RSL, local authority, and professional groups.
- 4.28 Two thirds of respondents answered question 37 b) (67%), with high rates of response in the local authority, and professional groups.
- 4.29 One of the professional group commented on purchaser demand as the key influence on value:

“Customers looking to purchase a property will place their own recognition on the value of more sustainable home. The market is reflected by demand, not supply.” – RICS Scotland

- 4.30 Most respondents called for **information to influence consumers**- particularly owner occupiers - with messaging that highlighted lifestyle and wellbeing, Scottish pride, success, meeting a challenge and succeeding. There was a need for independent, robust **evidence of improved value and discussion of cost benefits**, and **good practice examples**. Examples cited included the Green Homes Network, BRE’s Innovation Park, the Greener Homes Innovation Scheme, RSL Passivhaus projects, biomass district heating, locally sourced fuel systems, and Scottish low energy housing systems, including Sigma, IQ-System, Val-U-Therm and Makar. Large scale exemplars of mainstream housing were needed, not just one-off and self-build projects.
- 4.31 Some referred to the need to drive change in the construction industry, to set robust standards, and for financial incentives. Suggestions to **drive change in the construction industry** included: encouraging builders to adopt new practices, technology, and marketing; tackling poor practice in door to door selling; work with the DIY sector and small builders to raise awareness; and reducing product costs through innovation and collaborative working. One private sector respondent recommended the simplification of energy assessor training, suggesting a merging of qualifications relating to new build and existing buildings.
- 4.32 There were also calls for **robust and demanding standards** –
- “... it would send the wrong signal to householders if the Scottish Government stepped back from the recommendations in the Sullivan Report on new build standards. Strong and ambitious building standards will drive innovation, quality, and a reputation for low carbon building – anything less and Scotland will not be able to capitalise on this economic opportunity.” – Age Scotland, WWF Scotland, Existing Homes Alliance, Association for Conservation of Energy
- 4.33 In addition to the familiar calls for financial **incentives** through variances in Stamp Duty / LBTT and council tax, there were calls for suitable tariffs for air source heat pumps in off-gas areas, and subsidisation of energy efficient measures / appliances so that they were more affordable than alternatives. There were calls for **discounted / green mortgages** by several respondents.

5 ANALYSIS OF RESPONSES: NEW BUILD MARKET TRANSFORMATION

- 5.1 Questions 38 to 42 covered the following issues for the new build market:
- measures to encourage sustainable neighbourhoods;
 - challenges to new build transformation;.

- support for innovative construction techniques; improvements to the Affordable Housing Supply Programme to champion greener techniques; and other measures to promote sustainable housing.

Q38 What steps can we take to ensure that we design and develop sustainable neighbourhoods?

- 5.2 Two thirds of respondents answered question 38 (68%), with particularly high rates of response from the local authority and professional groups. Key issues were an expert multi-disciplinary approach, the role of building standards and planning regulation. Other issues included housing quality and exemplars.
- 5.3 A few welcomed progress to date, including Scottish Government work to encourage consideration of the main sustainability issues at the design stage and put in place high performance standards through building regulations.
- 5.4 Over a quarter of respondents advised a multi-disciplinary approach including project managers acting as sustainability champions and the use of sustainability checklists. Projects should plan for public transport connections, renewable energy generation and community heating schemes, resource efficiency in new homes, access to amenities, accessibility and flexibility for a range of households, open space and green networks. Suggestions also included long term management and maintenance, and wider changes in the way we work and travel. Several of the non-standard responses to the WWF campaign called for such features:
- “SG should insist all new-build houses should incorporate proven non-carbon power and/or water generation: solar panels, micro-hydro generators, community based wind/wave or tidal generators, and offer incentives to existing buildings to be retrofitted to a high standard.” – Individual campaign response
- 5.5 Over a quarter of respondents commented on the role of building standards and planning regulation. With respect to **planning**, many comments stressed the need to use the planning system to create a neighbourhood with minimal private transport requirements, and to promote district heating systems and local energy production. Other specific points included a case for nationally applied design and other standards, while others saw a role for Strategic and Local Development Plans and other subsidiary policies in articulating the policy context for standards of design. Homes for Scotland was concerned that the use of design guides across the country was pushing home builders to deliver a higher density housing environment that, in their view, customers do not want.
- 5.6 With regard to **building standards**, the points most frequently made related to the cost implications of rising energy standards. It was also suggested that the Scottish Government was under pressure to reduce both the 2013 interim standards and the 2016 zero-carbon standards, and some respondents saw that as a threat to the achievement of climate change targets.
- 5.7 Some respondents advised against increasing costs in the current housing market:

“... the overall number of completed new homes in Scotland has slumped from 25,741 in 2007 to 15,150 in 2011. Over that period, private sector housing has plummeted by 54% from 21,679 units in 2007 to just 9,893 units last year. In this context, the Scottish Government needs to be extremely careful that any additional measures introduced to encourage increased sustainability in new build housing do not impose costs that are likely to choke off recovery in the number of new homes completed.” – Scottish Building Federation

- 5.8 There was a private sector call for de-regulation that would reduce build costs, to offset the additional cost of greener homes and more sustainable communities. It cited the requirement for a downstairs future shower space as an example of a standard that in their opinion offered little benefit and added cost

Q39 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?

- 5.9 The consultation set out challenges to new build transformation: achieving higher levels of emissions reduction may require significant changes in construction methods and technologies; need appropriate capacity for innovative components and housing systems to be tested; the depressed housing market and constrained availability of finance limits demand for innovative products and investment in research and new facilities; some consumers may be unwilling to be ‘early adopters’ of new designs and technologies which affects demand; need to develop a multi-skilled workforce rather than specialists to avoid short term site employment.
- 5.10 Over half the respondents answered question 39 (59%), with low rates of response from the professional and ‘other’ groups. Apart from some comments on the challenges set out in the consultation, the further challenges identified were: economics and financing; use of building standards and planning systems; demonstration of benefits; and the nature of the development industry.
- 5.11 Nearly half the respondents commented on the **economics and financing of housing**, with concerns that the true costs of more sustainable building might be higher than stated and calls for whole life cost analysis of schemes such as the Fife Housing Innovative Showcase properties. One respondent queried the scale of cost premiums identified in paragraphs 2.44 - 2.47 of the consultation, compared to the South Lanarkshire College project. One of the non-standard campaign responses suggested that solar panels should be made more affordable by installing them at zero or very low cost with the costs recoverable from the energy sold back to the grid.
- 5.12 Although private development had dropped to a very low level, demand for housing remained high. One local authority suggested that developers were likely to improve sustainability where it was cost effective and where they could see a positive impact on sales, another noted that it proved difficult to sell new ground breaking eco-friendly homes at the Highland Housing Expo.

- 5.13 Homes for Scotland pointed out that very few house-builders had pursued the greener homes agenda, which in their view suggested that it did not make **economic sense** at this time. One respondent pointed out that high levels of prefabrication often delivered speed benefits, which were not always desired in a slow moving market. Another suggested that initially the number of house builders able to offer modern methods of construction (MMC) would be limited and the need to drive down costs through economies of scale would lead to a small number of large suppliers, until such time as MMC became viable at a smaller local scale.
- 5.14 Some raised issues of grant for affordable housing, which are discussed in the responses to question 41. Again, there were references to valuation issues. A private sector organisation argued that the Scottish Government had been very poor in assisting house-builders with innovation funding, and in particular that the Technology Strategy Board¹⁵ was not available in Scotland.
- 5.15 Some respondents commented on the importance of **building standards**. Only raising standards would improve sustainability; change and innovation came primarily through the 2010 building regulations, rather than through responses to consumer demand or producer innovation in the boom years up to 2008. Watering down or delaying the 2013 and 2016 standards could put the 10,000 jobs estimated to be created by the climate targets in jeopardy. One of the individual campaign respondents noted that building regulations were not strict enough to make new local homes carbon-neutral, but the cost of PV panels to developers would be small compared to individuals adding them at a later date. The WWF campaign itself called on the government to establish net-zero carbon standards for new homes by 2016.
- 5.16 Several raised the issue of **delays in the application of higher standards**-homes were being constructed under a range of different building regulations dependent on the date the building warrant was granted. The NHBC recommended adoption of a similar process to their own Building Standards which change annually, with a few months lead in time, applying from January at the start of laying foundations.
- 5.17 Again, there were calls for **greater sharing of information**. In addition to earlier suggestions, respondents advocated medium term monitoring of initiatives such as the Housing Innovation Showcase and for experience from pilot systems to be shared with developers.
- 5.18 Some respondents called for **improved quality of workmanship**. There was growing recognition of a performance gap between design and as-built

¹⁵ **The Technology Strategy Board** is an executive non-departmental public body (NDPB), established by the Government (in England and Wales) in 2007 and sponsored by the Department for Business, Innovation and Skills (BIS). **Its role** is to stimulate technology-enabled innovation in the areas which offer the greatest scope for boosting UK growth and productivity. It promotes, supports and invests in technology research, development and commercialisation. See www.innovateuk.org
The two organisations with primary responsibility for delivering innovation policy in Scotland are Scotland's two regional development agencies: [Highlands and Islands Enterprise](#) and [Scottish Enterprise](#).

performance - one respondent suggested application of a design penalty if an installer does not follow a quality assurance scheme, so that a building would be over-designed to mitigate the risk of underperformance. Conservatism in the industry was criticised - lack of training was also a problem during boom times, with manufacturers and producers generally unwilling to be early adopters of change.

“We note that there appears to be a growing consensus that the quality of workmanship plays a key role in determining whether or not a new build property will deliver the energy savings promised. All workers on site have to be brought into the low carbon message, and there is a key role for on-site project managers (a clerk of works) to oversee overall quality by checking the work of all the different sub-contractors.” – ‘Other’ group

Q40 What action is needed to increase the capacity for developing and bringing to market innovative methods of construction?

- 5.19 Nearly two thirds of respondents answered question 40 (64%), with particularly high rates of response from the local authority and professional groups and a low rate of response from the ‘other’ group. The key issues were raising confidence and awareness, funding and incentives, and regulatory standards. Some respondents repeated their response to question 39.
- 5.20 Over a third called for **evidence to give confidence in and raise awareness of such methods**, including life cycle analysis and proof of product, demonstration projects, information, and recognition of the current use of ‘innovative’ methods of construction in other parts of the UK and Europe; some of the calls for case studies may be superseded by the Greener Homes Prospectus,¹⁶ issued concurrently with the consultation. There were calls for robust evidence of benefits of new technologies or construction methods in use, with sharing of best practice, and **long-term monitoring** to assess performance and to consider the views of the building occupants, the implications of long term maintenance, and life cycle costs. Some called for pilot schemes, but others pointed out that the proposals set out in the Sullivan report did not require innovative or ground-breaking methods since the techniques have been used in Sweden and Germany for years – a knowledge exchange was needed, for instance with volume house builders learning from Passivhaus completions in Scotland.
- 5.21 As well as raising awareness in the industry, there were again calls for a sustained consumer-focussed campaign to **raise the profile of energy efficiency** so that house buyers would demand new homes with higher efficiency standards.
- 5.22 Over a third of the respondents called for **funding and incentives**: funding for affordable housing to lead market transformation, tax breaks for developers to increase capacity in the construction industry, and financial incentives to local authorities to use innovative / modern methods of construction. There were

¹⁶ <http://www.scotland.gov.uk/Topics/Built-Environment/Housing/sustainable/largescale>

numerous calls for funding of research and product accreditation, including calls from the private sector for 50% research funding to industry-led consortia for commercially focused, near to market solutions; and for the National Construction Innovation Centre proposed by Scottish Universities and currently 'on hold' with Scottish Funding Council.

- 5.23 A quarter called for **regulatory standards**, including continuing to set demanding building standards and allowing planning requirements that promote high performance housing, including two calls, from a local authority and a private sector organisation, to confirm zero carbon standards for 2016 as recommended in the Sullivan report. An additional requirement could be set for developers to reduce onsite waste – this would encourage prefabrication, which retains waste at the factory. Planning might require new estates to be designed around district heating systems, or all houses to be orientated to the South unless justifiable not to do so and designed to Passivhaus standards. It could be made easier to get planning permission for buildings with proven alternative construction methods.
- 5.24 Other issues were: education, training and accreditation to upskill the industry, demand related to the state of the market, financial market transformation with mortgage lenders both accepting and encouraging MMC, and varied opinions on centralised procurement including difficulties in delivering community benefits.
- Q41 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?**
- 5.25 Over half the respondents answered question 41 (59%), with particularly high rates of response from the RSL, local authority, and professional groups and a very low rate of response from the 'other' group.
- 5.26 Most respondents called for increased funding for the AHSP in general, a higher rate of supplementary funding for higher standards of sustainability, and for re-structuring AHSP to allow longer term programming.
- 5.27 There were calls for government to recognise the tensions inherent in its ambition for improving energy efficiency while reducing Housing Association Grant (HAG), and to therefore increase the current £4,000 subsidy to cover the additional costs, particularly in remote and island communities. There were several calls for a return to significantly **higher levels of public subsidy**, with reference to the increased construction costs acknowledged in the Greener Homes Prospectus, and for funding to incentivise higher standards and new technologies separate from the mainstream AHSP budget. A local authority noted the difficulty of addressing issues of enhanced standards at extra costs which is in conflict with providing the quantity of new build homes required to meet the needs of those on waiting lists and homeless households.
- 5.28 Certainty in **programming over longer periods** would assist effective, medium term procurement involving off-site manufacturing. There were calls

for certainty of investment levels over at least 3 years, or over 3-5 years to generate the efficiencies and relationships which could deliver greener construction methods and technologies. One RSL suggested flexibility in subsidy arrangements for projects which were purchased but not developed under the previous funding regime - discounting previous grant would help to generate subsidy levels capable of developing exemplar projects; another suggested a whole life funding calculation to include revenue from FiT and RHI being returned to the Government rather than held by the affordable housing developer.

- 5.29 A few respondents discussed procurement options, with mixed views on volume procurement and calls for financial support to private sector partners in affordable housing supply. An RSL commented that the Greener Homes Prospectus does not address procurement and its examples of new developments averaged fewer than 50 units. The SFHA commented that there was a risk that social housing was seen as a testing ground while a failure to mainstream would mean that savings were never fully realised. Some cautioned that any process should allow potential for local companies to bid, without undue over-centralisation, and that there was already a strong partnership approach across local authority services and RSLs.
- 5.30 Other recommendations included financing options to achieve higher standards, changes to the 'Section 7' criteria,¹⁷ and adoption of standardised sustainable specifications.

Q42 What further action is needed to influence the construction industry to make greater use of innovative methods to deliver more greener new homes?

- 5.31 Over half the respondents answered question 42 (60%), with a high response rate from the professional group and a low rate from the 'other' group.
- 5.32 A third identified the importance of **regulation**, including consideration of European targets, use of EPCs, building standards and planning systems to require greener new homes, including fast-tracking of applications. Many of the responses echoed themes discussed in response to questions 38 and 39. There was again only limited reference to zero carbon targets, but the Energy Saving Trust referred to forthcoming European requirements.¹⁸ Other, more general comments were that the market was unlikely to provide widespread delivery of more sustainable homes of its own accord, so regulation and higher standards were likely to be necessary. Other suggestions were to fast track planning and building warrant applications for developments using significant sustainable construction and energy technologies; and to stimulate

¹⁷ 'Section 7' refers to the sustainability labelling system introduced into building standards in 2011 and used as the basis of the £4,000 supplementary funding for higher standards of sustainability under the AHSP.

¹⁸ Article 9 of the recast of the Energy Performance of Buildings Directive includes requirements for 'nearly Zero-Energy Buildings' (nZEB), to be implemented from 2021 for all new buildings.

competition in the house building industry by enforcing energy efficiency ratings for new homes and highlighting associated running costs.

- 5.33 Over a third referred to **housing market issues**, including the need for scale and predictability. Scale would allow builders/developers to produce at the right level but predictability was needed to justify investment in new technologies. There needed to be confidence that the market would not be subject to fluctuations that could remove demand for a product which had taken heavy investment. One of the professional group commented that the construction industry rarely changed common practice except in response to regulation or market expectations - innovation would need to be encouraged by financial assistance and the prospect of greater market share for those prepared to take a risk. Current economic conditions were not conducive to change and expectations of what could be achieved would need to be managed over a longer period than may have originally been envisaged.
- 5.34 There was a call for a **centre of excellence** akin to the Zero Carbon Hub in England, where Scottish Government could work with industry and stakeholders to develop exemplar low/zero carbon new homes suitable for the Scottish context and climate, training and upskilling for construction workers, and a programme of measuring, testing, monitoring and quality assurance to ensure that new homes would perform as designed.
- 5.35 Some called for **proof of suitability for mortgage lending**. The Council for Mortgage Lenders relayed members' concerns about the ability of some designs that use innovative methods of construction to achieve a life span of at least 60 years and called for recognised standards of design, manufacture, and erection, plus the backing of a warranty provider such as NHBC.¹⁹ It pointed to the stalling of development of a loss prevention standard, LPS 2020.²⁰ A private sector respondent highlighted the new Build Offsite Property Assurance Scheme (BOPAS, see Annex C).

6 ANALYSIS OF RESPONSES: SKILLS AND TRAINING

6.1 Questions 43 to 48 addressed skills and training issues:

- Challenges to ensuring that Scottish companies have the skills for the low carbon economy; action to ensure investment in skills and training; industry awareness of support for training opportunities and interaction with training providers;

¹⁹NHBC (National House-Building Council) is the largest warranty provider for new and newly converted homes in the UK.

²⁰ Loss Prevention Standard LPS 2020: Standard for Innovative Systems, Elements and Components for Residential Buildings is a certification system for modern methods of construction that was being developed by BRE Certification Limited in consultation with the CML and other stakeholders. The written system standard was launched in 2006, but the CML states "We understand that work on LPS 2020 is now in abeyance due to the costs being unacceptable."

- Access to training by diverse groups; diversity issues in employment in the construction industry.
 - Skills and training issues for remote and island areas
- 6.2 Less than half the respondents answered this section (average 46%), but those responding included the trade associations, the sector skills body, the representative body for house-builders, and other organisations with a particular interest in skills and training.
- Q43 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? b) If not, what other challenges are there?**
- 6.3 Over half the respondents answered Q43a (60%); and more than half of these agreed that the consultation identified all the key skills challenges (67%). Less than half the respondents answered the related question Q43b (44%). Several reiterated challenges identified in the consultation; others expanded on those challenges and suggested others.
- 6.4 Over two thirds identified **quality and training issues**, both in terms of the need for greater confidence in the quality of advice and the measures installed, and for training provision.
- 6.5 There were some direct criticisms of the quality of installation of energy efficiency measures and calls for checks on installation with accurate feedback to the landlord. Quality control, regulation and enforcement might be required alongside skills development, to fully imbed the higher standards of construction required.
- 6.6 It was suggested that there is a need to develop energy efficiency knowledge and **skills in retrofit** amongst architects, building materials suppliers, builders and tradesmen, to identify correct solutions and avoid damage to older properties. Small builders and tradesmen need training on how to undertake work without damaging energy efficiency. One respondent commented that there is a shortage of training in the skills necessary to maintain existing homes, including stone masonry, and roof slating, tiling, and lead work.
- 6.7 For **newer technologies**, it was suggested that skills development courses should include training in customer service skills to explain how technologies work and influence behaviour so that those technologies would be used effectively. Also, the NRP and Green Deal would require skilled specialists to provide high quality energy and welfare advice. Respondents argued that local businesses must be trained to maintain the newer technologies once installed and that rigorous standards, accreditation and verification would be needed to build consumer confidence in renewable technologies.
- 6.8 Particular **quality issues identified by respondents** were: installing and commissioning mechanical ventilation; fitting insulation to avoid thermal bridging; construction detailing; sequencing for air tightness; installation and

commissioning of new heating and hot water systems; and installation and maintenance of micro renewables. Also, designers needed awareness of SAP rather than relying on third parties.

- 6.9 Respondents also identified a need to develop training and skills associated with **cultural and behavioural change**: collaborative working, project planning and project management, processes to improve productivity and reduce material waste, lean design and construction delivery, novel procurement and contracts.
- 6.10 There was considerable concern about **reduced capacity in colleges**, reflecting the recessionary environment and compounded by the regionalisation agenda in the post-16 review of vocational education - if capacity was lost at this point, it would be very difficult to re-establish.
- 6.11 Some respondents noted the **impact of the recession** on skills and capacity, while calling for investment to create demand and rebuild the skill base. The construction industry had suffered great loss of skills and capacity, with the number of registered apprentices falling from 2,758 in 2007 to 1,325 in 2010. Private sector respondents warned that the industry would struggle to achieve the required capacity when there was an upturn in the market. One private sector organisation commented that Ministers were not signalling clear and unambiguous commitments which would allow industry to train and invest. There is a need to prioritise **direct capital investment in construction** to rebuild lost capacity and give firms the confidence to recruit more apprentices – this could be assisted by a consistent approach to specifying higher levels of energy efficiency in public sector procurement projects. There is also the need to **build consumer demand** in retrofit and there was concern that the general public was largely uninformed about the Green Deal or measures other than loft and cavity insulation.
- 6.12 One private sector respondent suggested that Scotland was already experiencing **skills capacity issues** in boiler replacement, solar water heating, and biomass boilers. Some called for subsidised training and certification schemes for construction and maintenance companies, other for industry organisations such as SBF and FMB to ensure their members were up to date and skilled for Green Deal.

Q44 What further action is needed to ensure there is appropriate investment in skills and training to meet these opportunities?

- 6.13 Over half the respondents answered Q44 (57%). Many reiterated responses to Q43, in particular certainty about investment levels and future workloads were seen as central to companies' ability to invest in skills and training. The issue highlighted under question 44 by organisations representing the building industry and the skills council was investment for re-skilling and up-skilling.
- 6.14 The CITB-ConstructionSkills advised that the greatest challenge around retrofit and new build was not to increase new entrants to the construction industry, but to **re-skill and up-skill existing workers** at all levels from design, through to build. The majority of funding is targeted towards the 16-19

year old age group through Modern Apprenticeship programmes - flexibility of funding is also required to support construction employers to re-train and re-skill existing workers who might simply need a 'top-up' of skills and training rather than a new qualification.

- 6.15 A private sector organisation stated that in the current economic climate, SME construction companies would struggle to meet these costs and that government funding should support this programme.

Q45 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?

- 6.16 Less than half the respondents answered Q45 (46%). Several commented that industry was aware of training opportunities but constrained by lack of investment, business failures and difficulties in securing borrowing and that as resources were stretched people were not being offered the time they needed to be away from the business to take up learning opportunities.

- 6.17 CITB-ConstructionSkills initiatives included websites targeted at employers and prospective trainees (see Annex C). Other respondents suggested bodies to communicate opportunities: trade associations, training providers, trade regulating organisations such as Gas Safe, professional bodies, and BRE. Scottish Enterprise's Construction Scotland website is intended to serve as a single channel.

- 6.18 There were calls for the following: supplier development seminars to advise businesses on the skills they need to win contracts; a regional delivery and development body to engage relevant stakeholders in training and information sharing; and for an incentive to employers to extend their role within their communities.

Q46 How do we ensure that skills and training opportunities are provided on an equitable basis to all groups in society?

Q47 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?

- 6.19 There was much in common in responses to questions 46 and 47, which are treated jointly here. Less than half the respondents answered Q46 (48%); only just over a third of respondents answered Q47 (34%). Respondents identified both negative and positive features of the construction and retrofit industry and suggested ways to widen participation.

- 6.20 Some described the **nature of the construction and retrofit industry**, some listing negative perceptions of the industry as white male dominated, low paid, insecure, unskilled, and confrontational. There are cultural barriers, conventions and behaviours which are resistant to change: adversarial attitudes, a blame culture, silo operating, risk aversion, and resistance to

collective working and delivery. The industry is not appealing to new entrants and those wishing to re-train, with women under-represented, although one respondent noted that in the last 10 years the construction industry has made progress in embracing and promoting equality and diversity.

- 6.21 Some suggested **changes to make employment in the industry more representative of the labour force as a whole**: Procurement and contractual conditions should be used to ensure employment is more representative, with the adoption of Community Benefits in Public Procurement principles – a contractual requirement for contractors and sub-contractors to recruit at least 10% of their workforce from apprenticeships and new entrant trainees; and to provide work experience places and business support to SMEs and social enterprises to enable them to compete for work. Others pointed to initiatives led by local authorities with private and voluntary sector partners to increase the number of jobs, education, or training opportunities available to young people. There should be greater efforts to recruit through Job Centre Plus and advertising rather than word of mouth. There were calls to **raise awareness** of existing or potential opportunities: early promotion of the industry and careers guidance in schools, including respect for trade skills; offering work experience to school pupils; strengthening links between local businesses and schools; promotion of role models in the industry; and increasing vocational qualifications in schools, with links to apprenticeships. There is a need to demonstrate career pathways to new entrants and experienced workers, both in traditional and in new and emerging technologies and the promotion of career opportunities through networks where construction is not a traditional career of choice.
- 6.22 There were calls to incentivise the recruitment of specific target groups, local areas, or areas of social deprivation with **wage and training subsidies**. A local authority advocated a national framework of fully funded training schemes that caters equitably for all groups. There needed to be measures to ensure that smaller contractors were included. Institutions, associations, education establishments and public support services should **support trainees** in securing the first step in employment or technical education.
- 6.23 Several respondents said that the industry needs to **change culturally** and to **engage with women and ethnic minorities** to determine the change required to make it an attractive career choice (see Annex C for examples of programmes to increase access). Suggestions to improve working conditions included: use of MMC and offsite systems; improved facilities at training centres, on site and within offices; flexible work and training arrangements; and community interest companies for retrofit.

“Training and skills programmes for this type of work need to be designed specifically to be attractive to women and other groups who are traditionally under-represented in these industries. This should include options for flexible working where appropriate.” – Local authority

“Positive Promotion to Female & Ethnic groups. Change in culture. Better training conditions. Better working conditions.” – RSL

Q48 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.

- 6.24 Just under a third of respondents answered Q48 (32%). They identified difficulties in accessing training and the nature of local economies, while proposing measures to boost access to training and secure employment. Key difficulties were limited access to training and the nature of the local economy.
- 6.25 Respondents suggested that training costs were higher due to the absence of economies of scale, while there was pressure on college budgets and the college regionalisation agenda. Public transport provision was poor, and there was sometimes limited access to broadband. The lack of local training was particularly problematic for upskilling the existing workforce.
- 6.26 There were few local employers, and they were mostly small and micro-businesses, offering a lack of progression opportunities, and unable to afford non-productive staff in the current climate. There were few trained specialist installers, limited training budgets, and the impact of unfortunate experiences during the UHIS scheme, where many households decided not to go ahead with work, leaving firms out of pocket. Contracts may have been awarded to large companies without consideration of community benefits. It was difficult to sustain a local economy that could support trained specialists and small companies tended to be reluctant to move away from tried and tested techniques.
- 6.27 Respondents proposed measures to address these difficulties: economic stimulus, alternative modes of training, and subsidy for training. There were calls for stimulation of consumer demand, award of contracts to local businesses wherever possible, and increased investment to create predictable workloads that would allow local firms to plan ahead for real increases in skills and training opportunities. One suggestion was for Government licensing to limit the number of trained specialist individuals in a geographic area. Another was for a regional delivery body which could assist smaller players to participate in Green Deal and ECO opportunities and access relevant information as easily as those in urban areas. A local authority wanted to encourage partnership working between smaller firms, reducing costs and sharing apprentices. The Federation of Master Builders offered to facilitate consultation with local employers to learn about their practical solutions to the challenges they faced.
- 6.28 There were calls for more on-the-job training and for mobile training rigs. Suitable broadband access was needed for distance learning, to allow e-learning, video conferencing, and download of animations to demonstrate installation techniques. There could be on-line assessment with webcam to watch trainees, and summer schools sited for access by remote trainees. Respondents thought much could be learnt from Highlands and Islands Enterprise and local networks' delivery of skills and training programmes. The University of the Highlands and Islands might be the right body to ensure that the necessary skills were available.

- 6.29 College training and accommodation could be subsidised so rural learners could attend college for 3-4 days intensive training packages, including up-skilling. Smaller contractors could be assisted with training and travel budgets. Local authorities could spend the Fairer Scotland Fund on transport for training, or could fund IT equipment for distance learning courses.
- 6.30 CITB-ConstructionSkills emphasised the need to ‘future proof’ training provision for future volumes in addition to current demand. They reported that they support industry training groups led by local employers who agree an annual training programme, and achieve economies of scale by ensuring critical mass on courses.

7 CONCLUSION

- 7.1 A number of general themes emerged during the study.
- 7.2 There was strong support for the vision for “warm, high quality, affordable, low carbon homes” and a substantial number of respondents indicated support for the underpinning objectives, although some respondents questioned whether the fuel poverty target was realistic. A number of key organisations indicated strong support for a National Retrofit Programme (NRP). Some respondents suggested expanding the scope of the strategy – for example to include water efficiency, transport, and planning.
- 7.3 There was a clear view that a wealth of skills and experience has been built up over the course of previous initiatives, and that this should support the implementation of the strategy for existing buildings. In particular, respondents recommended that the National Retrofit Programme include both an area-based approach and a person-centred approach (focussing on the most vulnerable), making use of the Energy Saving Scotland advice centres to deliver information and advice services.
- 7.4 Respondents’ general preference for achieving standards in existing homes – both those relating to house condition and those to minimum energy efficiency standards – was to raise consumer awareness, provide financial assistance, and to incentivise property owners to undertake improvements. Nonetheless, there was substantial support for mandatory standards.
- 7.5 A consistent theme was the need to provide clear straightforward information for home owners and landlords about energy efficiency and its benefits. It was also stressed that information is required on the need to maintain and repair properties, how to obtain good advice on property maintenance and how to appoint appropriate contractors for repair and maintenance work. There was particular support for greater use of EPCs to influence household behaviour and encourage greater energy efficiency, and many of the recommendations for improved information and display should be satisfied by recent amendments to the energy performance of buildings regulations.
- 7.6 There was a general view that both sufficient funding support, and responsive and accessible funding mechanisms, would be essential to the success of the

strategy. There was currently a degree of uncertainty around the new funding approaches (Green Deal and ECO), both in terms of the amount of funding that will be available and potential uptake levels. Significant resources would be required, to fund solutions for hard-to-treat properties – both urban tenements and housing in areas off the gas grid - that tend to require more costly measures, such as solid wall insulation, or multiple measures. A key issue would be to provide comfort that appropriate funding mechanisms would be available for extended periods, to encourage cost-effective procurement and high rates of uptake. There were also suggestions that additional incentives such as tax breaks (for example council tax and the Land and Buildings Transaction Tax) would be an effective way of delivering the strategy's objectives.

- 7.7 There was a high level of support for the proposal that Scottish Government consider a single mandatory condition standard, beyond the tolerable standard, to apply to all tenures. The consultation document did not set out proposals for provisions for the new condition standard and it was not always clear what respondents envisaged in a new standard. When asked about enforcing such a standard, some respondents thought this could be problematic in the owner occupied sector except at point of sale or when major work was done to a house, because many households lacked resources to maintain or improve their homes. The responses about enforcement suggested that many respondents also had concerns about compulsion, which might result in some properties becoming un-saleable or un-lettable and some respondents expressed a preference for information and incentives over compulsion. Funding options would be helpful in enabling households meet new requirements. Further, a few respondents suggested there would be resistance and challenges on the grounds of choice.
- 7.8 The level of support for a minimum energy efficiency standard for private sector housing was lower, but still accounted for more than half of those who commented on the proposed standard. Respondents suggested that such a standard could assist in addressing fuel poverty and would make it easier for social landlords to deliver energy efficiency improvements in mixed tenure buildings. However, there were a number of reservations about the proposals; notably concerns that the costs of the required improvements would have an adverse impact on the housing market, and the practical challenges of enforcing the standard.
- 7.9 Although the strategy covers the period to 2030, the comments were heavily influenced by consideration of current economic conditions. However, the argument that the recession had limited new build market transformation was challenged by some, for example citing a lack of evidence of innovative design and approaches in the boom years up to 2008, or noting that building to high levels of energy efficiency is well established in other countries.
- 7.10 Respondents considered that the government could support new build market transformation, for example through increased funding for the affordable housing supply programme to enable the social rented sector to deliver more sustainable housing, and support for research and development.

7.11 A difficult message was that Scotland would not have an adequate, skilled workforce to take advantage of future improvement and house-building programmes, without considerable up-skilling and multi-skilling of the existing workforce and training of new entrants to the industry. Respondents commented that reductions in college places presented a particular risk to the future construction industry; and compounded companies' reluctance to commit to training in the current economic climate.

Annex A: RESPONDENTS AND SIMPLIFIED RESPONDENT CATEGORIES

a) All non-campaign respondents were allocated to simplified respondent categories:

- RSL sector, comprising RSLs, the Scottish Federation of Housing Associations (SFHA), and the Glasgow and West of Scotland Forum of Housing Associations;
- Local authority sector, comprising local authorities, the Association of Local Authority Chief Housing Officers (ALACHO), and the Convention of Scottish Local Authorities (COSLA);
- Private sector, comprising private sector organisations and representative bodies: Association for the Conservation of Energy (ACE), Council for Mortgage Lenders (CML), Federation of Master Builders (FMB), Homes for Scotland, National Federation of Roofing Contractors (NFRC), Scottish Building Federation (SBF), Scottish Property Federation (SPF), Scottish and Northern Ireland Plumbing Employers' Federation (SNIPEF);
- Professional, comprising representative bodies for professionals: Association for Consultancy and Engineering, the Chartered Institute of Housing (CIH), Chief Fire Officers Association Scotland, Royal Incorporation of Architects in Scotland (RIAS), Royal Institution of Chartered Surveyors (RICS), and Strathclyde Fire and Rescue Services;
- 'Other' group, comprising an NDPB, an 'Other statutory' organisation, nine third sector organisations, a community group, a university, and eight other organisations; and
- Individuals.

A summary is given at Table A a), overleaf and a list of the names of the non-campaign group organisations is given at Table B.

A summary of the WWF campaign respondents is given at Table A b).

Table A: Respondents, by declared categories and simplified categories

| a) Non-campaign responses Declared respondent categories | RSL | LA | Private | Professionals | Other group | Individual | ALL | |
|---|---------------|-----------|-----------|---------------|-------------|------------|------------|------------|
| | | | | | | | No. | % |
| NDPB | | | | | 1 | | 1 | 1 |
| Local authority | | 24 | | | | | 24 | 26 |
| Other statutory organisation | | | | | 1 | | 1 | 1 |
| Registered Social Landlord | 18 | | | | | | 18 | 20 |
| Representative body for: private sector organisations | | | 7 | | | | 7 | 8 |
| 3rd sector / equality organisations | 1 | | | | | | 1 | 1 |
| community organisations | 1 | | | | | | 1 | 1 |
| professionals | | 1 | | 6 | | | 7 | 8 |
| Private sector organisation | | | 8 | | | | 8 | 9 |
| Third sector / equality organisation | | | | | 9 | | 9 | 10 |
| Community group | | | | | 1 | | 1 | 1 |
| Academic | | | | | 1 | | 1 | 1 |
| Individual | | | | | | 2 | 2 | 2 |
| Other – please state...* | | 1 | 1 | | 8 | | 10 | 11 |
| All respondents | No. 20 | 26 | 16 | 6 | 21 | 2 | 91 | 100 |
| | % 22 | 29 | 18 | 7 | 23 | 2 | 100 | |
| <p>*Respondents selecting the category 'Other – please state...' comprised the following types of organisation:</p> <p>Multi-disciplinary: - Alliance of stakeholder groups (third sector, professionals); - Independent membership network- businesses, trades unions, local authorities, educational institutions, the voluntary sector and faith groups)</p> <p>Building: - Leading new home build warranty and Insurance organisation; - Trade Association; - Community of interest in ecological design and the built environment.</p> <p>Public sector: - Representative body for local authorities; - Network [health sector]; - Network of representatives from the health sector; - Special Health Board; and</p> <p>Consumer protection: - Representative body for consumers.</p> | | | | | | | | |
| b) Campaign responses | | | | | | | No. | % |
| Individual: Standard WWF text | | | | | | | 299 | 84 |
| Individual: Standard WWF text with minor variations | | | | | | | 37 | 10 |
| Individual: defamatory text | | | | | | | 1 | 0 |
| Individual: Standard WWF text replaced or substantial additions | | | | | | | 21 | 6 |
| ALL campaign responses | | | | | | | 358 | 100 |

Table B: Alphabetical list of group respondents with declared categories and simplified categories

| Organisation | Respondent category declared by respondent | Simplified respondent categories | | | | |
|---|--|----------------------------------|----|---------|---------------|-------------|
| | | RSL | LA | Private | Professionals | Other group |
| Aberdeen City Council | Local authority | | X | | | |
| Aberdeenshire Council | Local authority | | X | | | |
| Aberdeenshire Housing Partnership | RSL | X | | | | |
| Age Scotland | 3rd sector / equality org. | | | | | X |
| ALACHO (Association of Local Authority Chief Housing Officers) | Rep. body for professionals | | X | | | |
| Albyn Housing Association | RSL | X | | | | |
| Angus Council | Local authority | | X | | | |
| Argyll and Bute Council | Local authority | | X | | | |
| Argyll Community Housing Association | RSL | X | | | | |
| Association for Consultancy and Engineering | Rep. body for professionals | | | | X | |
| Association for the Conservation of Energy | Rep. body for private sector orgs. | | | X | | |
| Caledonia Housing Association | RSL | X | | | | |
| Calor Gas | Private sector org. | | | X | | |
| Castle Rock Edinvar | RSL | X | | | | |
| Cernach Housing Association | RSL | X | | | | |
| Changeworks | 3rd sector / equality org. | | | | | X |
| Chartered Institute of Housing | Rep. body for professionals | | | | X | |
| Chief Fire Officers Association Scotland | Rep. body for professionals | | | | X | |
| CITB Construction Skills | NDPB | | | | | X |
| City of Edinburgh Council | Local authority | | X | | | |
| Clackmannanshire Council | Local authority | | X | | | |
| Clyde Valley Housing Association | RSL | X | | | | |
| Comhairle nan EileanSiar | Local authority | | X | | | |
| Consumer Focus Scotland | Other | | | | | X |
| COSLA (Convention of Scottish Local Authorities) | Other | | X | | | |
| Council of Mortgage Lenders | Rep. body for private sector orgs. | | | X | | |
| Creative Energy Services | Private sector org. | | | X | | |
| Dumfries & Galloway Housing Partnership | RSL | X | | | | |
| Dundee City Council | Local authority | | X | | | |
| East Ayrshire Council | Local authority | | X | | | |
| East Lothian Council | Local authority | | X | | | |
| East Renfrewshire Council | Local authority | | X | | | |
| Electrical Safety Council | 3rd sector / equality org. | | | | | X |
| Energy Action Scotland | 3rd sector / equality org. | | | | | X |
| Energy Agency | 3rd sector / equality org. | | | | | X |
| Energy Saving Trust | 3rd sector / equality org. | | | | | X |
| Existing Homes Alliance | Other | | | | | X |
| Falkirk Council | Local authority | | X | | | |
| Fife Council | Local authority | | X | | | |
| FMB (Federation of Master Builders) | Rep. body for private sector orgs. | | | X | | |
| Glasgow and the Clyde Valley Strategic Development Planning Authority | Local authority | | X | | | |

| Organisation | Respondent category declared by respondent | Simplified respondent categories | | | | |
|--|--|----------------------------------|----|---------|---------------|-------------|
| | | RSL | LA | Private | Professionals | Other group |
| Glasgow and West of Scotland Forum of Housing Associations | Rep. body for Community orgs. | X | | | | |
| Glasgow City Council | Local authority | | X | | | |
| Glasgow Clyde Valley Green Network Partnership | Local authority | | X | | | |
| Glasgow Housing Association | RSL | X | | | | |
| Hacking and Paterson | Private sector org. | | | X | | |
| Healthy Environment Network/NHS Health Scotland | Other | | | | | X |
| Highland Council | Local authority | | X | | | |
| Homes for Scotland | Rep. body for private sector orgs. | | | X | | |
| Institute for Sustainable Construction, Napier University | Academic | | | | | X |
| Inverclyde Council | Local authority | | X | | | |
| Lanarkshire Housing Association | RSL | X | | | | |
| Link Group | RSL | X | | | | |
| Loreburn Housing Association | RSL | X | | | | |
| Manor Estates Housing Association | RSL | X | | | | |
| Moray Council, The | Local authority | | X | | | |
| NFRC Scotland (National Federation of Roofing Contractors) | Other | | | X | | |
| NHBC (National House-Building Council) | Other | | | | | X |
| NHS Health Scotland | Other | | | | | X |
| North Lanarkshire Council | Local authority | | X | | | |
| North View Housing Association | RSL | X | | | | |
| Orkney Housing Association Ltd | RSL | X | | | | |
| Partick Housing Association | RSL | X | | | | |
| Port of Leith Housing Association | RSL | X | | | | |
| Queen's Cross Housing Association | RSL | X | | | | |
| Redpath Bruce Property Management | Private sector org. | | | X | | |
| Renfrewshire Council | Local authority | | X | | | |
| RIAS (Royal Incorporation of Architects in Scotland, The) | Rep. body for professionals | | | | X | |
| RICS Scotland (Royal Institution of Chartered Surveyors) | Rep. body for professionals | | | | X | |
| Rockwool | Private sector org. | | | X | | |
| SBF (Scottish Building Federation) | Rep. body for private sector orgs. | | | X | | |
| SCDI (Scottish Council for Development and Industry) | Other | | | | | X |
| Scottish Borders Council | Local authority | | X | | | |
| Scottish Lands and Estates | Private sector org. | | | X | | |
| Scottish Property Federation | Rep. body for private sector orgs. | | | X | | |
| SEDA (Scottish Ecological Design Association) | Other | | | | | X |
| SEPA (Scottish Environment Protection Agency) | Other statutory org. | | | | | X |
| SFHA (Scottish Federation of Housing Associations) | Rep. body for 3rd sector / equality orgs. | X | | | | |
| Shelter Scotland | 3rd sector / equality org. | | | | | X |

| Organisation | Respondent category declared by respondent | Simplified respondent categories | | | | |
|--|--|----------------------------------|-----------|-----------|---------------|-------------|
| | | RSL | LA | Private | Professionals | Other group |
| SMaSH (Scottish Managed Sustainable Health Network) | Other | | | | | X |
| SNIFE (Scottish and Northern Ireland Plumbing Employers' Federation) | Rep. body for private sector orgs. | | | X | | |
| South Lanarkshire Council | Local authority | | X | | | |
| SSE plc | Private sector org. | | | X | | |
| Stewart Milne Group | Private sector org. | | | X | | |
| Strathclyde Fire and Rescue Services | Rep. body for professionals | | | | X | |
| Transition Linlithgow | Community group | | | | | X |
| Waterwise | 3rd sector / equality org. | | | | | X |
| West Lothian Council | Local authority | | X | | | |
| WWF Scotland | 3rd sector / equality org. | | | | | X |
| | | 20 | 26 | 16 | 6 | 21 |

Annex B: SUMMARY OF RESPONSES BY CATEGORY OF RESPONDENT

Background

Table B1: Q1 Are the vision and objectives as set out in sections 19 and 20 appropriate for Scotland's Sustainable Housing Strategy?

| Q1 Respondent categories | a) Response rate | | | | | | b) Responses | | | | | | | |
|-----------------------------|------------------|-----------|--------------|----------|-----------|------------|--------------|-----------|----------|----------|--------------|-----------|------------------|------------|
| | Response | | Nil response | | ALL | | Yes | | No | | Comment only | | All Q1 responses | |
| | No. | % | No. | % | No. | % | No. | % | No. | % | No. | % | No. | % |
| RSL | 19 | 95 | 1 | 5 | 20 | 100 | 15 | 79 | 2 | 11 | 2 | 11 | 19 | 100 |
| LA | 24 | 92 | 2 | 8 | 26 | 100 | 24 | 100 | 0 | 0 | 0 | 0 | 24 | 100 |
| Private | 14 | 88 | 2 | 13 | 16 | 100 | 9 | 64 | 1 | 7 | 4 | 29 | 14 | 100 |
| Professionals | 6 | 100 | 0 | 0 | 6 | 100 | 3 | 50 | 2 | 33 | 1 | 17 | 6 | 100 |
| Other group | 18 | 86 | 3 | 14 | 21 | 100 | 13 | 72 | 1 | 6 | 4 | 22 | 18 | 100 |
| Individual | 2 | 100 | 0 | 0 | 2 | 100 | 2 | 100 | 0 | 0 | 0 | 0 | 2 | 100 |
| ALL | 83 | 91 | 8 | 9 | 91 | 100 | 66 | 80 | 6 | 7 | 11 | 13 | 83 | 100 |

A National Retrofit Programme

Table B2: Q2 What do you think are the main barriers that prevent home owners and landlords from installing energy efficiency measures?

| Q2 Respondent categories | Response rate | | | | | |
|-----------------------------|---------------|-----------|--------------|-----------|-----------|------------|
| | Response | | Nil response | | ALL | |
| | No. | % | No. | % | No. | % |
| RSL | 19 | 95 | 1 | 5 | 20 | 100 |
| LA | 23 | 88 | 3 | 12 | 26 | 100 |
| Private | 13 | 81 | 3 | 19 | 16 | 100 |
| Professionals | 3 | 50 | 3 | 50 | 6 | 100 |
| Other group | 17 | 81 | 4 | 19 | 21 | 100 |
| Individual | 2 | 100 | 0 | 0 | 2 | 100 |
| ALL | 77 | 85 | 14 | 15 | 91 | 100 |

Table B3: Q3 Please explain any practical solutions and/or incentives to overcome any barriers you have identified.

| Q3 Respondent categories | Response rate | | | | | |
|-----------------------------|---------------|-----------|--------------|-----------|-----------|------------|
| | Response | | Nil response | | ALL | |
| | No. | % | No. | % | No. | % |
| RSL | 19 | 95 | 1 | 5 | 20 | 100 |
| LA | 23 | 88 | 3 | 12 | 26 | 100 |
| Private | 13 | 81 | 3 | 19 | 16 | 100 |
| Professionals | 3 | 50 | 3 | 50 | 6 | 100 |
| Other group | 17 | 81 | 4 | 19 | 21 | 100 |
| Individual | 2 | 100 | 0 | 0 | 2 | 100 |
| ALL | 77 | 85 | 14 | 15 | 91 | 100 |

Table B4: Q4 Given Scotland's diverse range of housing, what support is needed to enable people to get energy efficiency measures installed?

| Q4 Respondent categories | Response rate | | | | | |
|--------------------------------|---------------|-----------|--------------|-----------|-----------|------------|
| | Response | | Nil response | | ALL | |
| | No. | % | No. | % | No. | % |
| RSL | 19 | 95 | 1 | 5 | 20 | 100 |
| LA | 23 | 88 | 3 | 12 | 26 | 100 |
| Private | 13 | 81 | 3 | 19 | 16 | 100 |
| Professionals | 5 | 83 | 1 | 17 | 6 | 100 |
| Other group | 17 | 81 | 4 | 19 | 21 | 100 |
| Individual | 2 | 100 | 0 | 0 | 2 | 100 |
| ALL | 79 | 87 | 12 | 13 | 91 | 100 |

Table B5 a): Q5 a) What specific issues need to be addressed in respect of improving energy efficiency in rural areas, particularly more remote or island areas?

| Q5 a) Respondent categories | Response rate | | | | | |
|-----------------------------------|---------------|-----------|--------------|-----------|-----------|------------|
| | Response | | Nil response | | ALL | |
| | No. | % | No. | % | No. | % |
| RSL | 12 | 60 | 8 | 40 | 20 | 100 |
| LA | 17 | 65 | 9 | 35 | 26 | 100 |
| Private | 11 | 69 | 5 | 31 | 16 | 100 |
| Professionals | 5 | 83 | 1 | 17 | 6 | 100 |
| Other group | 17 | 81 | 4 | 19 | 21 | 100 |
| Individual | 2 | 100 | 0 | 0 | 2 | 100 |
| ALL | 64 | 70 | 27 | 30 | 91 | 100 |

Table B5 b): Q5 b) How should these be addressed?

| Q5 b) Respondent categories | Response rate | | | | | |
|-----------------------------------|---------------|-----------|--------------|-----------|-----------|------------|
| | Response | | Nil response | | ALL | |
| | No. | % | No. | % | No. | % |
| RSL | 12 | 60 | 8 | 40 | 20 | 100 |
| LA | 17 | 65 | 9 | 35 | 26 | 100 |
| Private | 11 | 69 | 5 | 31 | 16 | 100 |
| Professionals | 5 | 83 | 1 | 17 | 6 | 100 |
| Other group | 17 | 81 | 4 | 19 | 21 | 100 |
| Individual | 2 | 100 | 0 | 0 | 2 | 100 |
| ALL | 64 | 70 | 27 | 30 | 91 | 100 |

Table B6: Q6 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?

| Q6 Respondent categories | Response rate | | | | | |
|---|----------------------|-----------|--------------|-----------|------------|------------|
| | Response | | Nil response | | ALL | |
| | No. | % | No. | % | No. | % |
| RSL | 20 | 100 | 0 | 0 | 20 | 100 |
| LA | 25 | 96 | 1 | 4 | 26 | 100 |
| Private | 11 | 69 | 5 | 31 | 16 | 100 |
| Professionals | 4 | 67 | 2 | 33 | 6 | 100 |
| Other group | 17 | 81 | 4 | 19 | 21 | 100 |
| Individual | 2 | 100 | 0 | 0 | 2 | 100 |
| ALL | 79 | 87 | 12 | 13 | 91 | 100 |

Table B7: Q7 What role should the Scottish Government play in a National Retrofit Programme?

| Q7 Respondent categories | Response rate | | | | | |
|---|----------------------|-----------|--------------|-----------|------------|------------|
| | Response | | Nil response | | ALL | |
| | No. | % | No. | % | No. | % |
| RSL | 18 | 90 | 2 | 10 | 20 | 100 |
| LA | 24 | 92 | 2 | 8 | 26 | 100 |
| Private | 12 | 75 | 4 | 25 | 16 | 100 |
| Professionals | 5 | 83 | 1 | 17 | 6 | 100 |
| Other group | 17 | 81 | 4 | 19 | 21 | 100 |
| Individual | 2 | 100 | 0 | 0 | 2 | 100 |
| ALL | 78 | 86 | 13 | 14 | 91 | 100 |

Table B8: Q8 What role could the devolution of additional powers play in achieving more retrofit?

| Q8 Respondent categories | Response rate | | | | | |
|---|----------------------|-----------|--------------|-----------|------------|------------|
| | Response | | Nil response | | ALL | |
| | No. | % | No. | % | No. | % |
| RSL | 11 | 55 | 9 | 45 | 20 | 100 |
| LA | 16 | 62 | 10 | 38 | 26 | 100 |
| Private | 7 | 44 | 9 | 56 | 16 | 100 |
| Professionals | 1 | 17 | 5 | 83 | 6 | 100 |
| Other group | 7 | 33 | 14 | 67 | 21 | 100 |
| Individual | 1 | 50 | 1 | 50 | 2 | 100 |
| ALL | 43 | 47 | 48 | 53 | 91 | 100 |

Table B9: Q9 What further action is needed to achieve the scale of change required to existing homes?

| Q9 Respondent categories | Response rate | | | | | |
|--------------------------------|---------------|-----------|--------------|-----------|-----------|------------|
| | Response | | Nil response | | ALL | |
| | No. | % | No. | % | No. | % |
| RSL | 16 | 80 | 4 | 20 | 20 | 100 |
| LA | 24 | 92 | 2 | 8 | 26 | 100 |
| Private | 9 | 56 | 7 | 44 | 16 | 100 |
| Professionals | 3 | 50 | 3 | 50 | 6 | 100 |
| Other group | 15 | 71 | 6 | 29 | 21 | 100 |
| Individual | 2 | 100 | 0 | 0 | 2 | 100 |
| ALL | 69 | 76 | 22 | 24 | 91 | 100 |

Table B10: Q10 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)?

| Q10 Respondent categories | Response rate | | | | | |
|---------------------------------|---------------|-----------|--------------|-----------|-----------|------------|
| | Response | | Nil response | | ALL | |
| | No. | % | No. | % | No. | % |
| RSL | 16 | 80 | 4 | 20 | 20 | 100 |
| LA | 22 | 85 | 4 | 15 | 26 | 100 |
| Private | 9 | 56 | 7 | 44 | 16 | 100 |
| Professionals | 5 | 83 | 1 | 17 | 6 | 100 |
| Other group | 17 | 81 | 4 | 19 | 21 | 100 |
| Individual | 2 | 100 | 0 | 0 | 2 | 100 |
| ALL | 71 | 78 | 20 | 22 | 91 | 100 |

The Role of Standards

Table B11 a): Q11 a) Should the Scottish Government consider whether a single mandatory condition standard (beyond the tolerable standard) should apply to all properties, irrespective of tenure?

| Q11 a) Respondent categories | a) Response rate | | | | | | b) Responses | | | | | | | |
|------------------------------------|------------------|-----------|--------------|-----------|-----------|------------|--------------|-----------|-----------|-----------|--------------|----------|----------------------|------------|
| | Response | | Nil response | | ALL | | Yes | | No | | Comment only | | All Q11 a) responses | |
| | No. | % | No. | % | No. | % | No. | % | No. | % | No. | % | No. | % |
| RSL | 18 | 90 | 2 | 10 | 20 | 100 | 15 | 83 | 2 | 11 | 1 | 6 | 18 | 100 |
| LA | 22 | 85 | 4 | 15 | 26 | 100 | 16 | 73 | 5 | 23 | 1 | 5 | 22 | 100 |
| Private | 11 | 69 | 5 | 31 | 16 | 100 | 5 | 45 | 5 | 45 | 1 | 9 | 11 | 100 |
| Professionals | 4 | 67 | 2 | 33 | 6 | 100 | 4 | 100 | 0 | 0 | 0 | 0 | 4 | 100 |
| Other group | 13 | 62 | 8 | 38 | 21 | 100 | 12 | 92 | 1 | 8 | 0 | 0 | 13 | 100 |
| Individual | 2 | 100 | 0 | 0 | 2 | 100 | 2 | 100 | 0 | 0 | 0 | 0 | 2 | 100 |
| ALL | 70 | 77 | 21 | 23 | 91 | 100 | 54 | 77 | 13 | 19 | 3 | 4 | 70 | 100 |

Table B11 b): Q11 b) If so, how would that be enforced?

| Q11 b) Respondent categories | Response rate | | | | | |
|------------------------------------|---------------|-----------|--------------|-----------|-----------|------------|
| | Response | | Nil response | | ALL | |
| | No. | % | No. | % | No. | % |
| RSL | 17 | 85 | 3 | 15 | 20 | 100 |
| LA | 24 | 92 | 2 | 8 | 26 | 100 |
| Private | 12 | 75 | 4 | 25 | 16 | 100 |
| Professionals | 5 | 83 | 1 | 17 | 6 | 100 |
| Other group | 14 | 67 | 7 | 33 | 21 | 100 |
| Individual | 2 | 100 | 0 | 0 | 2 | 100 |
| ALL | 74 | 81 | 17 | 19 | 91 | 100 |

Table B12 a): Q12 a) In box 6 we identify a checklist for maintaining a quality home. Do you agree with our proposed hierarchy of needs?

| Q12 a) Respondent categories | a) Response rate | | | | | | b) Responses | | | | | |
|------------------------------------|------------------|-----------|--------------|-----------|-----------|------------|--------------|-----------|-----------|-----------|----------------------|------------|
| | Response | | Nil response | | ALL | | Yes | | No | | All Q12 a) responses | |
| | No. | % | No. | % | No. | % | No. | % | No. | % | No. | % |
| RSL | 17 | 85 | 3 | 15 | 20 | 100 | 11 | 65 | 6 | 35 | 17 | 100 |
| LA | 21 | 81 | 5 | 19 | 26 | 100 | 17 | 81 | 4 | 19 | 21 | 100 |
| Private | 9 | 56 | 7 | 44 | 16 | 100 | 6 | 67 | 3 | 33 | 9 | 100 |
| Professionals | 5 | 83 | 1 | 17 | 6 | 100 | 3 | 60 | 2 | 40 | 5 | 100 |
| Other group | 15 | 71 | 6 | 29 | 21 | 100 | 9 | 60 | 6 | 40 | 15 | 100 |
| Individual | 2 | 100 | 0 | 0 | 2 | 100 | 2 | 100 | 0 | 0 | 2 | 100 |
| ALL | 69 | 76 | 22 | 24 | 91 | 100 | 48 | 70 | 21 | 30 | 69 | 100 |

Table B12 b): Q12 b) If you think anything is missing or in the wrong place please explain your views

| Q12 b) Respondent categories | Response rate | | | | | |
|------------------------------------|---------------|-----------|--------------|-----------|-----------|------------|
| | Response | | Nil response | | ALL | |
| | No. | % | No. | % | No. | % |
| RSL | 12 | 60 | 8 | 40 | 20 | 100 |
| LA | 18 | 69 | 8 | 31 | 26 | 100 |
| Private | 8 | 50 | 8 | 50 | 16 | 100 |
| Professionals | 3 | 50 | 3 | 50 | 6 | 100 |
| Other group | 14 | 67 | 7 | 33 | 21 | 100 |
| Individual | 2 | 100 | 0 | 0 | 2 | 100 |
| ALL | 57 | 63 | 34 | 37 | 91 | 100 |

Table B13: Q13 Should local authorities be able to require that owners improve their properties, in the same way they can require that they repair them?

| Q13 Respondent categories | a) Response rate | | | | | | b) Responses | | | | | | | |
|---------------------------------|------------------|-----------|-----------------|-----------|-----------|------------|--------------|-----------|-----------|----|-----------------|----|----------------------|------------|
| | Response | | Nil response | | ALL | | Yes | | No | | Comment only | | All Q13 responses | |
| | No. | % | No. | % | No. | % | No. | % | No. | % | No. | % | No. | % |
| RSL | 16 | 80 | 4 | 20 | 20 | 100 | 14 | 88 | 1 | 6 | 1 | 6 | 16 | 100 |
| LA | 23 | 88 | 3 | 12 | 26 | 100 | 13 | 57 | 9 | 39 | 1 | 4 | 23 | 100 |
| Private | 12 | 75 | 4 | 25 | 16 | 100 | 6 | 50 | 4 | 33 | 2 | 17 | 12 | 100 |
| Professionals | 6 | 100 | 0 | 0 | 6 | 100 | 2 | 33 | 2 | 33 | 2 | 33 | 6 | 100 |
| Other group | 15 | 71 | 6 | 29 | 21 | 100 | 11 | 73 | 2 | 13 | 2 | 13 | 15 | 100 |
| Individual | 2 | 100 | 0 | 0 | 2 | 100 | 0 | 0 | 1 | 50 | 1 | 50 | 2 | 100 |
| ALL | 74 | 81 | 17 | 19 | 91 | 100 | 46 | 62 | 19 | 26 | 9 | 12 | 74 | 100 |

Table B14: Q14 Should local authorities have a power to enforce decisions taken by owners under the title deeds, tenement management scheme or by unanimity?

| Q14 Respondent categories | a) Response rate | | | | | | b) Responses | | | | | | | |
|---------------------------------|------------------|-----------|-----------------|-----------|-----------|------------|--------------|-----------|-----------|----|-----------------|----|----------------------|------------|
| | Response | | Nil response | | ALL | | Yes | | No | | Comment only | | All Q14 responses | |
| | No. | % | No. | % | No. | % | No. | % | No. | % | No. | % | No. | % |
| RSL | 16 | 80 | 4 | 20 | 20 | 100 | 11 | 69 | 3 | 19 | 2 | 13 | 16 | 100 |
| LA | 22 | 85 | 4 | 15 | 26 | 100 | 14 | 64 | 4 | 18 | 4 | 18 | 22 | 100 |
| Private | 11 | 69 | 5 | 31 | 16 | 100 | 9 | 82 | 2 | 18 | 0 | 0 | 11 | 100 |
| Professionals | 4 | 67 | 2 | 33 | 6 | 100 | 3 | 75 | 0 | 0 | 1 | 25 | 4 | 100 |
| Other group | 12 | 57 | 9 | 43 | 21 | 100 | 10 | 83 | 1 | 8 | 1 | 8 | 12 | 100 |
| Individual | 1 | 50 | 1 | 50 | 2 | 100 | 1 | 100 | 0 | 0 | 0 | 0 | 1 | 100 |
| ALL | 66 | 73 | 25 | 27 | 91 | 100 | 48 | 73 | 10 | 15 | 8 | 12 | 66 | 100 |

Table B15: Q15 Should local authorities be able to automatically issue maintenance orders on any property which has had a work notice?

| Q15 Respondent categories | a) Response rate | | | | | | b) Responses | | | | | | | |
|---------------------------------|------------------|-----------|-----------------|-----------|-----------|------------|--------------|-----------|----------|-----------|-----------------|----------|----------------------|------------|
| | Response | | Nil response | | ALL | | Yes | | No | | Comment only | | All Q15 responses | |
| | No. | % | No. | % | No. | % | No. | % | No. | % | No. | % | No. | % |
| RSL | 14 | 70 | 6 | 30 | 20 | 100 | 12 | 86 | 1 | 7 | 1 | 7 | 14 | 100 |
| LA | 23 | 88 | 3 | 12 | 26 | 100 | 20 | 87 | 2 | 9 | 1 | 4 | 23 | 100 |
| Private | 11 | 69 | 5 | 31 | 16 | 100 | 6 | 55 | 2 | 18 | 3 | 27 | 11 | 100 |
| Professionals | 1 | 17 | 5 | 83 | 6 | 100 | 1 | 100 | 0 | 0 | 0 | 0 | 1 | 100 |
| Other group | 8 | 38 | 13 | 62 | 21 | 100 | 7 | 88 | 1 | 13 | 0 | 0 | 8 | 100 |
| Individual | 0 | 0 | 2 | 100 | 2 | 100 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | n/a |
| ALL | 57 | 63 | 34 | 37 | 91 | 100 | 46 | 81 | 6 | 11 | 5 | 9 | 57 | 100 |

Table B16: Q16 Should the process for using maintenance orders be streamlined, and if so, how?

| Q16 Respondent categories | a) Response rate | | | | | | b) Responses | | | | | | | |
|---------------------------------|------------------|-----------|-----------------|-----------|-----------|------------|--------------|-----------|----------|----------|-----------------|----------|----------------------|------------|
| | Response | | Nil response | | ALL | | Yes | | No | | Comment only | | All Q16 responses | |
| | No. | % | No. | % | No. | % | No. | % | No. | % | No. | % | No. | % |
| RSL | 13 | 65 | 7 | 35 | 20 | 100 | 11 | 85 | 1 | 8 | 1 | 8 | 13 | 100 |
| LA | 23 | 88 | 3 | 12 | 26 | 100 | 20 | 87 | 1 | 4 | 2 | 9 | 23 | 100 |
| Private | 6 | 38 | 10 | 63 | 16 | 100 | 5 | 83 | 0 | 0 | 1 | 17 | 6 | 100 |
| Professionals | 1 | 17 | 5 | 83 | 6 | 100 | 1 | 100 | 0 | 0 | 0 | 0 | 1 | 100 |
| Other group | 2 | 10 | 19 | 90 | 21 | 100 | 2 | 100 | 0 | 0 | 0 | 0 | 2 | 100 |
| Individual | 0 | 0 | 2 | 100 | 2 | 100 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | n/a |
| ALL | 45 | 49 | 46 | 51 | 91 | 100 | 39 | 87 | 2 | 4 | 4 | 9 | 45 | 100 |

Table B17: Q17 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?

| Q17 Respondent categories | a) Response rate | | | | | | b) Responses | | | | | | | |
|---------------------------------|------------------|-----------|-----------------|-----------|-----------|------------|--------------|-----------|----------|-----------|-----------------|-----------|----------------------|------------|
| | Response | | Nil response | | ALL | | Yes | | No | | Comment only | | All Q17 responses | |
| | No. | % | No. | % | No. | % | No. | % | No. | % | No. | % | No. | % |
| RSL | 13 | 65 | 7 | 35 | 20 | 100 | 11 | 85 | 1 | 8 | 1 | 8 | 13 | 100 |
| LA | 23 | 88 | 3 | 12 | 26 | 100 | 18 | 78 | 3 | 13 | 2 | 9 | 23 | 100 |
| Private | 10 | 63 | 6 | 38 | 16 | 100 | 6 | 60 | 1 | 10 | 3 | 30 | 10 | 100 |
| Professionals | 2 | 33 | 4 | 67 | 6 | 100 | 1 | 50 | 0 | 0 | 1 | 50 | 2 | 100 |
| Other group | 5 | 24 | 16 | 76 | 21 | 100 | 4 | 80 | 1 | 20 | 0 | 0 | 5 | 100 |
| Individual | 0 | 0 | 2 | 100 | 2 | 100 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | n/a |
| ALL | 53 | 58 | 38 | 42 | 91 | 100 | 40 | 75 | 6 | 11 | 7 | 13 | 53 | 100 |

Table B18: Q18 Should local authorities be able to issue repayment charges for work done on commercial properties, in the same way they can for residential premises?

| Q18 Respondent categories | a) Response rate | | | | | | b) Responses | | | | | | | |
|---------------------------------|------------------|-----------|-----------------|-----------|-----------|------------|--------------|-----------|----------|----------|-----------------|-----------|----------------------|------------|
| | Response | | Nil response | | ALL | | Yes | | No | | Comment only | | All Q18 responses | |
| | No. | % | No. | % | No. | % | No. | % | No. | % | No. | % | No. | % |
| RSL | 13 | 65 | 7 | 35 | 20 | 100 | 12 | 92 | 0 | 0 | 1 | 8 | 13 | 100 |
| LA | 21 | 81 | 5 | 19 | 26 | 100 | 19 | 90 | 1 | 5 | 1 | 5 | 21 | 100 |
| Private | 11 | 69 | 5 | 31 | 16 | 100 | 7 | 64 | 1 | 9 | 3 | 27 | 11 | 100 |
| Professionals | 4 | 67 | 2 | 33 | 6 | 100 | 3 | 75 | 0 | 0 | 1 | 25 | 4 | 100 |
| Other group | 6 | 29 | 15 | 71 | 21 | 100 | 4 | 67 | 1 | 17 | 1 | 17 | 6 | 100 |
| Individual | 1 | 50 | 1 | 50 | 2 | 100 | 1 | 100 | 0 | 0 | 0 | 0 | 1 | 100 |
| ALL | 56 | 62 | 35 | 38 | 91 | 100 | 46 | 82 | 3 | 5 | 7 | 13 | 56 | 100 |

Table B19: Q19 What action, if any, do you think the Government should take to make it easier to dismiss and replace property factors?

| Q19 Respondent categories | Response rate | | | | | |
|---------------------------------|---------------|-----------|--------------|-----------|-----------|------------|
| | Response | | Nil response | | ALL | |
| | No. | % | No. | % | No. | % |
| RSL | 15 | 75 | 5 | 25 | 20 | 100 |
| LA | 20 | 77 | 6 | 23 | 26 | 100 |
| Private | 5 | 31 | 11 | 69 | 16 | 100 |
| Professionals | 2 | 33 | 4 | 67 | 6 | 100 |
| Other group | 5 | 24 | 16 | 76 | 21 | 100 |
| Individual | 1 | 50 | 1 | 50 | 2 | 100 |
| ALL | 48 | 53 | 43 | 47 | 91 | 100 |

Table B20: Q20 What action can be taken to raise the importance placed by owners and tenants on the energy efficiency of their properties?

| Q20 Respondent categories | Response rate | | | | | |
|---------------------------------|---------------|-----------|--------------|-----------|-----------|------------|
| | Response | | Nil response | | ALL | |
| | No. | % | No. | % | No. | % |
| RSL | 16 | 80 | 4 | 20 | 20 | 100 |
| LA | 23 | 88 | 3 | 12 | 26 | 100 |
| Private | 12 | 75 | 4 | 25 | 16 | 100 |
| Professionals | 3 | 50 | 3 | 50 | 6 | 100 |
| Other group | 16 | 76 | 5 | 24 | 21 | 100 |
| Individual | 2 | 100 | 0 | 0 | 2 | 100 |
| ALL | 72 | 79 | 19 | 21 | 91 | 100 |

Table B21 a): Q21 Should the Scottish Government introduce minimum energy efficiency standards for private sector housing?

| Q21 Respondent categories | Response rate | | | | | |
|---------------------------------|---------------|-----------|--------------|-----------|-----------|------------|
| | Response | | Nil response | | ALL | |
| | No. | % | No. | % | No. | % |
| RSL | 18 | 90 | 2 | 10 | 20 | 100 |
| LA | 25 | 96 | 1 | 4 | 26 | 100 |
| Private | 13 | 81 | 3 | 19 | 16 | 100 |
| Professionals | 6 | 100 | 0 | 0 | 6 | 100 |
| Other group | 15 | 71 | 6 | 29 | 21 | 100 |
| Individual | 2 | 100 | 0 | 0 | 2 | 100 |
| ALL | 79 | 87 | 12 | 13 | 91 | 100 |

Q21 was an open question, presented without Yes / No options. LSA therefore checked all the responses to try to understand the balance of agreement, as shown in the following table:

Table B21 b): Supplementary analysis of responses to Q21

| Q21 Respondent categories | Supportive | | Disagree, unenthusiastic, or suggested alternative | | Undecided | | Nil response | | ALL | |
|---------------------------------|------------|-----------|---|-----------|-----------|----------|--------------|-----------|-----------|------------|
| | No. | % | No. | % | No. | % | No. | % | No. | % |
| | RSL | 15 | 75 | 3 | 15 | 0 | 0 | 2 | 10 | 20 |
| LA | 16 | 62 | 5 | 19 | 4 | 15 | 1 | 4 | 26 | 100 |
| Private | 6 | 38 | 7 | 44 | 0 | 0 | 3 | 19 | 16 | 100 |
| Professionals | 3 | 50 | 1 | 17 | 2 | 33 | 0 | 0 | 6 | 100 |
| Other group | 11 | 52 | 2 | 10 | 2 | 10 | 6 | 29 | 21 | 100 |
| Individual | 1 | 50 | 1 | 50 | 0 | 0 | 0 | 0 | 2 | 100 |
| ALL | 52 | 57 | 19 | 21 | 8 | 9 | 12 | 13 | 91 | 100 |

Table B22: Q22 How could we amend EPCs to make them a more useful tool for influencing behaviour change to improve energy efficiency?

| Q22 Respondent categories | Response rate | | | | | |
|---------------------------------|---------------|-----------|--------------|-----------|-----------|------------|
| | Response | | Nil response | | ALL | |
| | No. | % | No. | % | No. | % |
| RSL | 17 | 85 | 3 | 15 | 20 | 100 |
| LA | 21 | 81 | 5 | 19 | 26 | 100 |
| Private | 11 | 69 | 5 | 31 | 16 | 100 |
| Professionals | 2 | 33 | 4 | 67 | 6 | 100 |
| Other group | 13 | 62 | 8 | 38 | 21 | 100 |
| Individual | 2 | 100 | 0 | 0 | 2 | 100 |
| ALL | 66 | 73 | 25 | 27 | 91 | 100 |

Table B23: Q23 Are there other key principles that we ought to consider when looking at the possible introduction of regulations?

| Q23 Respondent categories | Response rate | | | | | |
|---------------------------------|---------------|-----------|--------------|-----------|-----------|------------|
| | Response | | Nil response | | ALL | |
| | No. | % | No. | % | No. | % |
| RSL | 13 | 65 | 7 | 35 | 20 | 100 |
| LA | 21 | 81 | 5 | 19 | 26 | 100 |
| Private | 8 | 50 | 8 | 50 | 16 | 100 |
| Professionals | 5 | 83 | 1 | 17 | 6 | 100 |
| Other group | 14 | 67 | 7 | 33 | 21 | 100 |
| Individual | 2 | 100 | 0 | 0 | 2 | 100 |
| ALL | 63 | 69 | 28 | 31 | 91 | 100 |

Table B24: Q24 How could regulation be used to support the uptake of incentives?

| Q24 Respondent categories | Response rate | | | | | |
|---------------------------------|---------------|-----------|--------------|-----------|-----------|------------|
| | Response | | Nil response | | ALL | |
| | No. | % | No. | % | No. | % |
| RSL | 13 | 65 | 7 | 35 | 20 | 100 |
| LA | 21 | 81 | 5 | 19 | 26 | 100 |
| Private | 10 | 63 | 6 | 38 | 16 | 100 |
| Professionals | 2 | 33 | 4 | 67 | 6 | 100 |
| Other group | 13 | 62 | 8 | 38 | 21 | 100 |
| Individual | 2 | 100 | 0 | 0 | 2 | 100 |
| ALL | 61 | 67 | 30 | 33 | 91 | 100 |

Table B25: Q25 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?

| Q25 Respondent categories | Response rate | | | | | |
|---------------------------------|---------------|-----------|--------------|-----------|-----------|------------|
| | Response | | Nil response | | ALL | |
| | No. | % | No. | % | No. | % |
| RSL | 14 | 70 | 6 | 30 | 20 | 100 |
| LA | 19 | 73 | 7 | 27 | 26 | 100 |
| Private | 10 | 63 | 6 | 38 | 16 | 100 |
| Professionals | 2 | 33 | 4 | 67 | 6 | 100 |
| Other group | 14 | 67 | 7 | 33 | 21 | 100 |
| Individual | 2 | 100 | 0 | 0 | 2 | 100 |
| ALL | 61 | 67 | 30 | 33 | 91 | 100 |

Table B26: Q26 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?

| Q26 Respondent categories | a) Response rate | | | | | | b) Responses | | | | | | | |
|---------------------------------|------------------|-----------|--------------|-----------|-----------|------------|--------------|-----------|----------|----------|--------------|-----------|-------------------|------------|
| | Response | | Nil response | | ALL | | Yes | | No | | Comment only | | All Q26 responses | |
| | No. | % | No. | % | No. | % | No. | % | No. | % | No. | % | No. | % |
| RSL | 18 | 90 | 2 | 10 | 20 | 100 | 16 | 89 | 1 | 6 | 1 | 6 | 18 | 100 |
| LA | 22 | 85 | 4 | 15 | 26 | 100 | 19 | 86 | 2 | 9 | 1 | 5 | 22 | 100 |
| Private | 11 | 69 | 5 | 31 | 16 | 100 | 9 | 82 | 1 | 9 | 1 | 9 | 11 | 100 |
| Professionals | 5 | 83 | 1 | 17 | 6 | 100 | 4 | 80 | 0 | 0 | 1 | 20 | 5 | 100 |
| Other group | 16 | 76 | 5 | 24 | 21 | 100 | 10 | 63 | 1 | 6 | 5 | 31 | 16 | 100 |
| Individual | 2 | 100 | 0 | 0 | 2 | 100 | 0 | 0 | 1 | 50 | 1 | 50 | 2 | 100 |
| ALL | 74 | 81 | 17 | 19 | 91 | 100 | 58 | 78 | 6 | 8 | 10 | 14 | 74 | 100 |

Table B27: Q27 If you agree with Q26, should houses of the same type in the social and private sectors be expected to meet the same standard?

| Q27 Respondent categories | a) Response rate | | | | | | b) Responses | | | | | | | |
|---------------------------------|------------------|-----------|--------------|-----------|-----------|------------|--------------|-----------|----------|----------|--------------|-----------|-------------------|------------|
| | Response | | Nil response | | ALL | | Yes | | No | | Comment only | | All Q27 responses | |
| | No. | % | No. | % | No. | % | No. | % | No. | % | No. | % | No. | % |
| RSL | 18 | 90 | 2 | 10 | 20 | 100 | 15 | 83 | 0 | 0 | 3 | 17 | 18 | 100 |
| LA | 22 | 85 | 4 | 15 | 26 | 100 | 20 | 91 | 0 | 0 | 2 | 9 | 22 | 100 |
| Private | 10 | 63 | 6 | 38 | 16 | 100 | 6 | 60 | 2 | 20 | 2 | 20 | 10 | 100 |
| Professionals | 5 | 83 | 1 | 17 | 6 | 100 | 4 | 80 | 0 | 0 | 1 | 20 | 5 | 100 |
| Other group | 13 | 62 | 8 | 38 | 21 | 100 | 9 | 69 | 0 | 0 | 4 | 31 | 13 | 100 |
| Individual | 1 | 50 | 1 | 50 | 2 | 100 | 0 | 0 | 0 | 0 | 1 | 100 | 1 | 100 |
| ALL | 69 | 76 | 22 | 24 | 91 | 100 | 54 | 78 | 2 | 3 | 13 | 19 | 69 | 100 |

Table B28: Q28 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?

| Q28 Respondent categories | Response rate | | | | | |
|---------------------------------|---------------|-----------|--------------|-----------|-----------|------------|
| | Response | | Nil response | | ALL | |
| | No. | % | No. | % | No. | % |
| RSL | 14 | 70 | 6 | 30 | 20 | 100 |
| LA | 19 | 73 | 7 | 27 | 26 | 100 |
| Private | 8 | 50 | 8 | 50 | 16 | 100 |
| Professionals | 5 | 83 | 1 | 17 | 6 | 100 |
| Other group | 10 | 48 | 11 | 52 | 21 | 100 |
| Individual | 2 | 100 | 0 | 0 | 2 | 100 |
| ALL | 58 | 64 | 33 | 36 | 91 | 100 |

Table B29: Q29 Should we consider additional trigger points to point of sale or rental? If so, what?

| Q29 Respondent categories | a) Response rate | | | | | | b) Responses | | | | | | | |
|---------------------------------|------------------|-----------|--------------|-----------|-----------|------------|--------------|-----------|-----------|-----------|--------------|-----------|-------------------|------------|
| | Response | | Nil response | | ALL | | Yes | | No | | Comment only | | All Q29 responses | |
| | No. | % | No. | % | No. | % | No. | % | No. | % | No. | % | No. | % |
| RSL | 16 | 80 | 4 | 20 | 20 | 100 | 9 | 56 | 5 | 31 | 2 | 13 | 16 | 100 |
| LA | 22 | 85 | 4 | 15 | 26 | 100 | 13 | 59 | 3 | 14 | 6 | 27 | 22 | 100 |
| Private | 10 | 63 | 6 | 38 | 16 | 100 | 6 | 60 | 2 | 20 | 2 | 20 | 10 | 100 |
| Professionals | 2 | 33 | 4 | 67 | 6 | 100 | 2 | 100 | 0 | 0 | 0 | 0 | 2 | 100 |
| Other group | 15 | 71 | 6 | 29 | 21 | 100 | 9 | 60 | 0 | 0 | 6 | 40 | 15 | 100 |
| Individual | 1 | 50 | 1 | 50 | 2 | 100 | 1 | 100 | 0 | 0 | 0 | 0 | 1 | 100 |
| ALL | 66 | 73 | 25 | 27 | 91 | 100 | 40 | 61 | 10 | 15 | 16 | 24 | 66 | 100 |

Table B30: Q30 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?

| Q30 Respondent categories | a) Response rate | | | | | | b) Responses | | | | | | | |
|---------------------------------|------------------|-----------|--------------|-----------|-----------|------------|--------------|-----------|-----------|-----------|--------------|-----------|-------------------|------------|
| | Response | | Nil response | | ALL | | Yes | | No | | Comment only | | All Q30 responses | |
| | No. | % | No. | % | No. | % | No. | % | No. | % | No. | % | No. | % |
| RSL | 16 | 80 | 4 | 20 | 20 | 100 | 8 | 50 | 4 | 25 | 4 | 25 | 16 | 100 |
| LA | 22 | 85 | 4 | 15 | 26 | 100 | 12 | 55 | 1 | 5 | 9 | 41 | 22 | 100 |
| Private | 11 | 69 | 5 | 31 | 16 | 100 | 4 | 36 | 3 | 27 | 4 | 36 | 11 | 100 |
| Professionals | 5 | 83 | 1 | 17 | 6 | 100 | 1 | 20 | 3 | 60 | 1 | 20 | 5 | 100 |
| Other group | 14 | 67 | 7 | 33 | 21 | 100 | 6 | 43 | 0 | 0 | 8 | 57 | 14 | 100 |
| Individual | 1 | 50 | 1 | 50 | 2 | 100 | 0 | 0 | 0 | 0 | 1 | 100 | 1 | 100 |
| ALL | 69 | 76 | 22 | 24 | 91 | 100 | 31 | 45 | 11 | 16 | 27 | 39 | 69 | 100 |

Table B31: Q31 What other issues around enforcement do we need to think about when considering how different approaches to regulation might work?

| Q31 Respondent categories | Response rate | | | | | |
|---------------------------------|---------------|-----------|--------------|-----------|-----------|------------|
| | Response | | Nil response | | ALL | |
| | No. | % | No. | % | No. | % |
| RSL | 10 | 50 | 10 | 50 | 20 | 100 |
| LA | 19 | 73 | 7 | 27 | 26 | 100 |
| Private | 8 | 50 | 8 | 50 | 16 | 100 |
| Professionals | 4 | 67 | 2 | 33 | 6 | 100 |
| Other group | 11 | 52 | 10 | 48 | 21 | 100 |
| Individual | 1 | 50 | 1 | 50 | 2 | 100 |
| ALL | 53 | 58 | 38 | 42 | 91 | 100 |

Table B32a: Q32 a) Do you think that sanctions on owners should be used to enforce regulations?

| Q32 a) Respondent categories | a) Response rate | | | | | | b) Responses | | | | | | | |
|------------------------------------|------------------|-----------|--------------|-----------|-----------|------------|--------------|-----------|-----------|-----------|--------------|-----------|----------------------|------------|
| | Response | | Nil response | | ALL | | Yes | | No | | Comment only | | All Q32 a) responses | |
| | No. | % | No. | % | No. | % | No. | % | No. | % | No. | % | No. | % |
| RSL | 15 | 75 | 5 | 25 | 20 | 100 | 13 | 87 | 2 | 13 | 0 | 0 | 15 | 100 |
| LA | 20 | 77 | 6 | 23 | 26 | 100 | 11 | 55 | 8 | 40 | 1 | 5 | 20 | 100 |
| Private | 9 | 56 | 7 | 44 | 16 | 100 | 5 | 56 | 3 | 33 | 1 | 11 | 9 | 100 |
| Professionals | 2 | 33 | 4 | 67 | 6 | 100 | 2 | 100 | 0 | 0 | 0 | 0 | 2 | 100 |
| Other group | 13 | 62 | 8 | 38 | 21 | 100 | 8 | 62 | 1 | 8 | 4 | 31 | 13 | 100 |
| Individual | 1 | 50 | 1 | 50 | 2 | 100 | 0 | 0 | 0 | 0 | 1 | 100 | 1 | 100 |
| ALL | 60 | 66 | 31 | 34 | 91 | 100 | 39 | 65 | 14 | 23 | 7 | 12 | 60 | 100 |

Table B32b: Q32 b) Should owners be able to pass the sanction or obligation on to buyers?

| Q32 b) Respondent categories | a) Response rate | | | | | | b) Responses | | | | | | | |
|------------------------------------|------------------|-----------|-----------------|-----------|-----------|------------|--------------|-----------|-----------|-----------|-----------------|-----------|-------------------------|------------|
| | Response | | Nil response | | ALL | | Yes | | No | | Comment only | | All Q32 b) responses | |
| | No. | % | No. | % | No. | % | No. | % | No. | % | No. | % | No. | % |
| RSL | 15 | 75 | 5 | 25 | 20 | 100 | 10 | 67 | 5 | 33 | 0 | 0 | 15 | 100 |
| LA | 20 | 77 | 6 | 23 | 26 | 100 | 7 | 35 | 11 | 55 | 2 | 10 | 20 | 100 |
| Private | 9 | 56 | 7 | 44 | 16 | 100 | 3 | 33 | 5 | 56 | 1 | 11 | 9 | 100 |
| Professionals | 3 | 50 | 3 | 50 | 6 | 100 | 2 | 67 | 0 | 0 | 1 | 33 | 3 | 100 |
| Other group | 15 | 71 | 6 | 29 | 21 | 100 | 7 | 47 | 2 | 13 | 6 | 40 | 15 | 100 |
| Individual | 1 | 50 | 1 | 50 | 2 | 100 | 0 | 0 | 0 | 0 | 1 | 100 | 1 | 100 |
| ALL | 63 | 69 | 28 | 31 | 91 | 100 | 29 | 46 | 23 | 37 | 11 | 17 | 63 | 100 |

Table B33: Q33 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?

| Q33 Respondent categories | Response rate | | | | | |
|---------------------------------|---------------|-----------|--------------|-----------|-----------|------------|
| | Response | | Nil response | | ALL | |
| | No. | % | No. | % | No. | % |
| RSL | 14 | 70 | 6 | 30 | 20 | 100 |
| LA | 20 | 77 | 6 | 23 | 26 | 100 |
| Private | 9 | 56 | 7 | 44 | 16 | 100 |
| Professionals | 3 | 50 | 3 | 50 | 6 | 100 |
| Other group | 14 | 67 | 7 | 33 | 21 | 100 |
| Individual | 2 | 100 | 0 | 0 | 2 | 100 |
| ALL | 62 | 68 | 29 | 32 | 91 | 100 |

Financial Market Transformation

Table B34 a): Q34 a) In sections 3.11 - 3.13 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?

| Q34 a) Respondent categories | a) Response rate | | | | | | b) Responses | | | | | | | |
|------------------------------------|------------------|-----------|--------------|-----------|-----------|------------|--------------|-----------|-----------|-----------|--------------|----------|----------------------|------------|
| | Response | | Nil response | | ALL | | Yes | | No | | Comment only | | All Q34 a) responses | |
| | No. | % | No. | % | No. | % | No. | % | No. | % | No. | % | No. | % |
| RSL | 14 | 70 | 6 | 30 | 20 | 100 | 11 | 79 | 2 | 14 | 1 | 7 | 14 | 100 |
| LA | 18 | 69 | 8 | 31 | 26 | 100 | 13 | 72 | 5 | 28 | 0 | 0 | 18 | 100 |
| Private | 8 | 50 | 8 | 50 | 16 | 100 | 2 | 25 | 5 | 63 | 1 | 13 | 8 | 100 |
| Professionals | 4 | 67 | 2 | 33 | 6 | 100 | 1 | 25 | 3 | 75 | 0 | 0 | 4 | 100 |
| Other group | 11 | 52 | 10 | 48 | 21 | 100 | 3 | 27 | 5 | 45 | 3 | 27 | 11 | 100 |
| Individual | 0 | 0 | 2 | 100 | 2 | 100 | | | | | | | | n/a |
| ALL | 55 | 60 | 36 | 40 | 91 | 100 | 30 | 55 | 20 | 36 | 5 | 9 | 55 | 100 |

Table B34 b): Q34 b) Can you suggest any other ways to help transform the market for more energy efficient, sustainable homes?

| Q34 b) Respondent categories | Response rate | | | | | |
|---------------------------------|---------------|-----------|--------------|-----------|-----------|------------|
| | Response | | Nil response | | ALL | |
| | No. | % | No. | % | No. | % |
| RSL | 9 | 45 | 11 | 55 | 20 | 100 |
| LA | 17 | 65 | 9 | 35 | 26 | 100 |
| Private | 10 | 63 | 6 | 38 | 16 | 100 |
| Professionals | 4 | 67 | 2 | 33 | 6 | 100 |
| Other group | 13 | 62 | 8 | 38 | 21 | 100 |
| Individual | 2 | 100 | 0 | 0 | 2 | 100 |
| ALL | 55 | 60 | 36 | 40 | 91 | 100 |

Table B35: Q35 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?

| Q35 Respondent categories | Response rate | | | | | |
|------------------------------|---------------|-----------|--------------|-----------|-----------|------------|
| | Response | | Nil response | | ALL | |
| | No. | % | No. | % | No. | % |
| RSL | 11 | 55 | 9 | 45 | 20 | 100 |
| LA | 16 | 62 | 10 | 38 | 26 | 100 |
| Private | 9 | 56 | 7 | 44 | 16 | 100 |
| Professionals | 2 | 33 | 4 | 67 | 6 | 100 |
| Other group | 12 | 57 | 9 | 43 | 21 | 100 |
| Individual | 1 | 50 | 1 | 50 | 2 | 100 |
| ALL | 51 | 56 | 40 | 44 | 91 | 100 |

Table B36: Q36 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?

| Q36 Respondent categories | Response rate | | | | | |
|------------------------------|---------------|-----------|--------------|-----------|-----------|------------|
| | Response | | Nil response | | ALL | |
| | No. | % | No. | % | No. | % |
| RSL | 12 | 60 | 8 | 40 | 20 | 100 |
| LA | 16 | 62 | 10 | 38 | 26 | 100 |
| Private | 9 | 56 | 7 | 44 | 16 | 100 |
| Professionals | 5 | 83 | 1 | 17 | 6 | 100 |
| Other group | 13 | 62 | 8 | 38 | 21 | 100 |
| Individual | 0 | 0 | 2 | 100 | 2 | 100 |
| ALL | 55 | 60 | 36 | 40 | 91 | 100 |

Table B37 a): Q37 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?

| Q37 a) Respondent categories | a) Response rate | | | | | | b) Responses | | | | | | | |
|---------------------------------|------------------|-----------|--------------|-----------|-----------|------------|--------------|-----------|----------|----------|--------------|-----------|----------------------|------------|
| | Response | | Nil response | | ALL | | Yes | | No | | Comment only | | All Q37 a) responses | |
| | No. | % | No. | % | No. | % | No. | % | No. | % | No. | % | No. | % |
| RSL | 12 | 60 | 8 | 40 | 20 | 100 | 11 | 92 | 1 | 8 | 0 | 0 | 12 | 100 |
| LA | 21 | 81 | 5 | 19 | 26 | 100 | 20 | 95 | 1 | 5 | 0 | 0 | 21 | 100 |
| Private | 8 | 50 | 8 | 50 | 16 | 100 | 4 | 50 | 2 | 25 | 2 | 25 | 8 | 100 |
| Professionals | 4 | 67 | 2 | 33 | 6 | 100 | 4 | 100 | 0 | 0 | 0 | 0 | 4 | 100 |
| Other group | 15 | 71 | 6 | 29 | 21 | 100 | 9 | 60 | 1 | 7 | 5 | 33 | 15 | 100 |
| Individual | 0 | 0 | 2 | 100 | 2 | 100 | | | | | | | | n/a |
| ALL | 60 | 66 | 31 | 34 | 91 | 100 | 48 | 80 | 5 | 8 | 7 | 12 | 60 | 100 |

Table B37 b): Q37 b) What further action is needed to influence consumers and the market?

| Q37 b) Respondent categories | Response rate | | | | | |
|---------------------------------|---------------|-----------|--------------|-----------|-----------|------------|
| | Response | | Nil response | | ALL | |
| | No. | % | No. | % | No. | % |
| RSL | 12 | 60 | 8 | 40 | 20 | 100 |
| LA | 20 | 77 | 6 | 23 | 26 | 100 |
| Private | 9 | 56 | 7 | 44 | 16 | 100 |
| Professionals | 5 | 83 | 1 | 17 | 6 | 100 |
| Other group | 14 | 67 | 7 | 33 | 21 | 100 |
| Individual | 1 | 50 | 1 | 50 | 2 | 100 |
| ALL | 61 | 67 | 30 | 33 | 91 | 100 |

New Build Market Transformation

Table B38: Q38 What steps can we take to ensure that we design and develop sustainable neighbourhoods?

| Q38 Respondent categories | Response rate | | | | | |
|------------------------------|---------------|-----------|--------------|-----------|-----------|------------|
| | Response | | Nil response | | ALL | |
| | No. | % | No. | % | No. | % |
| RSL | 14 | 70 | 6 | 30 | 20 | 100 |
| LA | 22 | 85 | 4 | 15 | 26 | 100 |
| Private | 9 | 56 | 7 | 44 | 16 | 100 |
| Professionals | 5 | 83 | 1 | 17 | 6 | 100 |
| Other group | 11 | 52 | 10 | 48 | 21 | 100 |
| Individual | 1 | 50 | 1 | 50 | 2 | 100 |
| ALL | 62 | 68 | 29 | 32 | 91 | 100 |

Table B39: Q39 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?

| Q39 Respondent categories | Response rate | | | | | |
|------------------------------|---------------|-----------|--------------|-----------|-----------|------------|
| | Response | | Nil response | | ALL | |
| | No. | % | No. | % | No. | % |
| RSL | 14 | 70 | 6 | 30 | 20 | 100 |
| LA | 17 | 65 | 9 | 35 | 26 | 100 |
| Private | 10 | 63 | 6 | 38 | 16 | 100 |
| Professionals | 2 | 33 | 4 | 67 | 6 | 100 |
| Other group | 10 | 48 | 11 | 52 | 21 | 100 |
| Individual | 1 | 50 | 1 | 50 | 2 | 100 |
| ALL | 54 | 59 | 37 | 41 | 91 | 100 |

Table B40: Q40 What action is needed to increase the capacity for developing and bringing to market innovative methods of construction?

| Q40 Respondent categories | Response rate | | | | | |
|------------------------------|---------------|-----------|--------------|-----------|-----------|------------|
| | Response | | Nil response | | ALL | |
| | No. | % | No. | % | No. | % |
| RSL | 14 | 70 | 6 | 30 | 20 | 100 |
| LA | 19 | 73 | 7 | 27 | 26 | 100 |
| Private | 11 | 69 | 5 | 31 | 16 | 100 |
| Professionals | 5 | 83 | 1 | 17 | 6 | 100 |
| Other group | 8 | 38 | 13 | 62 | 21 | 100 |
| Individual | 1 | 50 | 1 | 50 | 2 | 100 |
| ALL | 58 | 64 | 33 | 36 | 91 | 100 |

Table B41: Q41 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?

| Q41 Respondent categories | Response rate | | | | | |
|------------------------------|---------------|-----------|--------------|-----------|-----------|------------|
| | Response | | Nil response | | ALL | |
| | No. | % | No. | % | No. | % |
| RSL | 16 | 80 | 4 | 20 | 20 | 100 |
| LA | 19 | 73 | 7 | 27 | 26 | 100 |
| Private | 8 | 50 | 8 | 50 | 16 | 100 |
| Professionals | 5 | 83 | 1 | 17 | 6 | 100 |
| Other group | 5 | 24 | 16 | 76 | 21 | 100 |
| Individual | 1 | 50 | 1 | 50 | 2 | 100 |
| ALL | 54 | 59 | 37 | 41 | 91 | 100 |

Table B42: Q42 What further action is needed to influence the construction industry to make greater use of innovative methods to deliver more greener new homes?

| Q42 Respondent categories | Response rate | | | | | |
|---------------------------------|---------------|-----------|--------------|-----------|-----------|------------|
| | Response | | Nil response | | ALL | |
| | No. | % | No. | % | No. | % |
| RSL | 13 | 65 | 7 | 35 | 20 | 100 |
| LA | 17 | 65 | 9 | 35 | 26 | 100 |
| Private | 11 | 69 | 5 | 31 | 16 | 100 |
| Professionals | 5 | 83 | 1 | 17 | 6 | 100 |
| Other group | 7 | 33 | 14 | 67 | 21 | 100 |
| Individual | 2 | 100 | 0 | 0 | 2 | 100 |
| ALL | 55 | 60 | 36 | 40 | 91 | 100 |

Skills and Training

Table B43 a): Q43 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?

| Q43a) Respondent categories | a) Response rate | | | | | | b) Responses | | | | | | | |
|-----------------------------------|------------------|-----------|--------------|-----------|-----------|------------|--------------|-----------|-----------|-----------|--------------|----------|--------------------|------------|
| | Response | | Nil response | | ALL | | Yes | | No | | Comment only | | All Q43a responses | |
| | No. | % | No. | % | No. | % | No. | % | No. | % | No. | % | No. | % |
| RSL | 13 | 65 | 7 | 35 | 20 | 100 | 9 | 69 | 3 | 23 | 1 | 8 | 13 | 100 |
| LA | 17 | 65 | 9 | 35 | 26 | 100 | 17 | 100 | 0 | 0 | 0 | 0 | 17 | 100 |
| Private | 10 | 63 | 6 | 38 | 16 | 100 | 4 | 40 | 4 | 40 | 2 | 20 | 10 | 100 |
| Professionals | 4 | 67 | 2 | 33 | 6 | 100 | 2 | 50 | 2 | 50 | 0 | 0 | 4 | 100 |
| Other group | 11 | 52 | 10 | 48 | 21 | 100 | 5 | 45 | 5 | 45 | 1 | 9 | 11 | 100 |
| Individual | 0 | 0 | 2 | 100 | 2 | 100 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | n/a |
| ALL | 55 | 60 | 36 | 40 | 91 | 100 | 37 | 67 | 14 | 25 | 4 | 7 | 55 | 100 |

Table B43 b): Q43 b) If not, what other challenges are there?

| Q43b) Respondent categories | Response rate | | | | | |
|-----------------------------------|---------------|-----------|--------------|-----------|-----------|------------|
| | Response | | Nil response | | ALL | |
| | No. | % | No. | % | No. | % |
| RSL | 9 | 45 | 11 | 55 | 20 | 100 |
| LA | 8 | 31 | 18 | 69 | 26 | 100 |
| Private | 9 | 56 | 7 | 44 | 16 | 100 |
| Professionals | 3 | 50 | 3 | 50 | 6 | 100 |
| Other group | 10 | 48 | 11 | 52 | 21 | 100 |
| Individual | 1 | 50 | 1 | 50 | 2 | 100 |
| ALL | 40 | 44 | 51 | 56 | 91 | 100 |

Table B44: Q44 What further action is needed to ensure there is appropriate investment in skills and training to meet these opportunities?

| Q44 Respondent categories | Response rate | | | | | |
|---------------------------------|---------------|-----------|--------------|-----------|-----------|------------|
| | Response | | Nil response | | ALL | |
| | No. | % | No. | % | No. | % |
| RSL | 10 | 50 | 10 | 50 | 20 | 100 |
| LA | 16 | 62 | 10 | 38 | 26 | 100 |
| Private | 10 | 63 | 6 | 38 | 16 | 100 |
| Professionals | 2 | 33 | 4 | 67 | 6 | 100 |
| Other group | 13 | 62 | 8 | 38 | 21 | 100 |
| Individual | 1 | 50 | 1 | 50 | 2 | 100 |
| ALL | 52 | 57 | 39 | 43 | 91 | 100 |

Table B45: Q45 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?

| Q45 Respondent categories | Response rate | | | | | |
|---------------------------------|---------------|-----------|--------------|-----------|-----------|------------|
| | Response | | Nil response | | ALL | |
| | No. | % | No. | % | No. | % |
| RSL | 10 | 50 | 10 | 50 | 20 | 100 |
| LA | 15 | 58 | 11 | 42 | 26 | 100 |
| Private | 8 | 50 | 8 | 50 | 16 | 100 |
| Professionals | 1 | 17 | 5 | 83 | 6 | 100 |
| Other group | 7 | 33 | 14 | 67 | 21 | 100 |
| Individual | 1 | 50 | 1 | 50 | 2 | 100 |
| ALL | 42 | 46 | 49 | 54 | 91 | 100 |

Table B46: Q46 How do we ensure that skills and training opportunities are provided on an equitable basis to all groups in society?

| Q46 Respondent categories | Response rate | | | | | |
|---------------------------------|---------------|-----------|--------------|-----------|-----------|------------|
| | Response | | Nil response | | ALL | |
| | No. | % | No. | % | No. | % |
| RSL | 10 | 50 | 10 | 50 | 20 | 100 |
| LA | 16 | 62 | 10 | 38 | 26 | 100 |
| Private | 6 | 38 | 10 | 63 | 16 | 100 |
| Professionals | 1 | 17 | 5 | 83 | 6 | 100 |
| Other group | 10 | 48 | 11 | 52 | 21 | 100 |
| Individual | 1 | 50 | 1 | 50 | 2 | 100 |
| ALL | 44 | 48 | 47 | 52 | 91 | 100 |

Table B47: Q47 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?

| Q47 Respondent categories | Response rate | | | | | |
|--|----------------------|-----------|--------------|-----------|------------|------------|
| | Response | | Nil response | | ALL | |
| | No. | % | No. | % | No. | % |
| RSL | 9 | 45 | 11 | 55 | 20 | 100 |
| LA | 11 | 42 | 15 | 58 | 26 | 100 |
| Private | 3 | 19 | 13 | 81 | 16 | 100 |
| Professionals | 1 | 17 | 5 | 83 | 6 | 100 |
| Other group | 6 | 29 | 15 | 71 | 21 | 100 |
| Individual | 1 | 50 | 1 | 50 | 2 | 100 |
| ALL | 31 | 34 | 60 | 66 | 91 | 100 |

Table B48: Q48 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.

| Q48 Respondent categories | Response rate | | | | | |
|--|----------------------|-----------|--------------|-----------|------------|------------|
| | Response | | Nil response | | ALL | |
| | No. | % | No. | % | No. | % |
| RSL | 7 | 35 | 13 | 65 | 20 | 100 |
| LA | 9 | 35 | 17 | 65 | 26 | 100 |
| Private | 4 | 25 | 12 | 75 | 16 | 100 |
| Professionals | 1 | 17 | 5 | 83 | 6 | 100 |
| Other group | 7 | 33 | 14 | 67 | 21 | 100 |
| Individual | 1 | 50 | 1 | 50 | 2 | 100 |
| ALL | 29 | 32 | 62 | 68 | 91 | 100 |

Annex C: POTENTIAL CASE STUDIES AND REFERENCES

1) Case studies

Respondents mentioned a number of projects that may be of assistance in developing the strategy.

Access to work initiatives Respondents mentioned: the Bridge Project to encourage more asylum seekers and immigrants into the industry; Women First in Castlemilk; and North Lanarkshire's Gateway programme which provided support to Congolese refugees looking to work in the industry.

Build Offsite Property Assurance Scheme (BOPAS) is a relatively new scheme intended to simplify and quicken the process of obtaining mortgages on unusual building techniques. It has been developed by [Buildoffsite](#), with **Lloyd's**, BLP Insurance, the RICS and mortgage lenders Santander, Lloyds TSB Group (including HBOS), Nationwide and RBS.

Castle Rock Edinvar has a self-delivery model on maintenance that has allowed around 30 young people to benefit from employment/placement in the last 3 years, many securing permanent employment.

Changeworks Warm and Well helps anyone in East Lothian and Midlothian, whose health may be affected by living in a cold, damp or draughty home; the team works closely with health and social work professionals, and others who come into contact with individuals whose health may be at risk.

CITB-ConstructionSkills has a number of initiatives to disseminate information about the construction industry including opportunities to improve energy efficiency:

- Cut the carbon website for employers with information on government policy, grants and funding, and information on training provision by occupational and geographic area www.cutcarbon.info
- BConstructive website about careers in construction including case studies of individuals from under-represented groups www.bconstructive.co.uk;
- developing a qualifications route map to 2020 with AssetSkills, Energy and Utility Skills and SummitSkills;
- the Construction Ambassador programme trains individuals from the industry to talk to primary and secondary pupils about careers in the construction industry;
- it has contributed to Skills Development Scotland's 'My World of Work' website;
- Green Deal pilot in a rural area, working with Scottish Government's Energy Efficiency Team, in order to identify the barriers and challenges which a SME wishing to offer assessment or installation services may encounter.
- plans to map manufacturers own courses to the National Occupational Standards (NOS) in order to increase the scope of available qualifications.

Dundee Energy Efficiency Advice Project (DEEAP) Includes school projects to raise awareness of climate change and energy use from an early age.

Energy Saving Trust should be able to adapt their online solar calculator and cashback calculator tools so that they can take the remaining life of a renewables system into account when calculating the financial benefits of these systems, and a similar tool could be developed for the domestic Renewable Heat Incentive once finalised by DECC; Solar calculator: www.energysavingtrust.org.uk/Generating-energy/Getting-money-back/Solar-Energy-Calculator and Cashback calculator: www.energysavingtrust.org.uk/Generating-energy/Getting-money-back/Cashback-Calculator

Fife Council / Energy Saving Trust Solid wall insulation pilot with interest free loans alongside CERT or CESP provides insight into householders' attitude to paying for measures using loan finance, as will be the case with the Green Deal.

Glasgow City Council has delivered an extensive range of Intermediate Labour Market programmes, normally targeted at the long-term unemployed such as temporary jobs as Community Janitors and Landscape Operatives for young people unemployed for at least 12 months.

Glasgow Factoring Commission The Leader of Glasgow City Council established a Factoring Commission in June 2012, tasked with developing practical recommendations to improve property management in the city. The call for evidence closed in September 2012, draft recommendations will be published for consultation early in 2013:

www.glasgow.gov.uk/en/Residents/YourHome/HousingOptions/RepairsImprovements/glasgowfactoringcommission.htm

Glasgow Housing Association GHA has installed 500 photovoltaic systems across Glasgow to reduce fuel poverty. Its dedicated Fuel Poverty Advisor service delivers individual advice and support, for instance on tariff switching. GHA has renovated high rise, hard-to-treat blocks in the city, retrofitting a Combined Heat and Power district system in conjunction with their external wall insulation programme. GHA builds all its new homes to Eco Homes 'Very good' Standard. It has developed The Glasgow House, designed to have a total annual heating cost of around £100.

Glasgow Regeneration Agency provide a dual service to both employers and residents who are unemployed, particularly those in the most deprived areas of Glasgow; it provides employers with a comprehensive account managed recruitment service, advice and assistance to access wage and training funding and in-work support service for new recruits.

Housing Innovative Showcase partnership between [Kingdom Housing Association](#) & [Fife Council](#) with support from [Fife Construction Forum](#) and [Green Business Fife](#) to promote sustainability and demonstrate how new methods of construction can be transferred to mainstream affordable housing.

Napier University The Institute for Sustainable Construction's Low Carbon Building Technologies Gateway includes animations of assembling buildings:

www.napier.ac.uk/randkt/sustainableconstruction/Pages/InnovationGateways.aspx;

the Scottish Resource Centre for Women in Science Engineering and Technology addresses the structural imbalances in the labour market and works with organisations to address business culture and practice:

<http://www.napier.ac.uk/randkt/rktcentres/src/Pages/default.aspx>

National Construction College (Glasgow) is running Train the Trainers courses in external and internal solid wall insulation for would-be trainers.

NHBC Foundation library of pragmatic and relevant research for the industry to address the challenges of sustainability and the drive towards zero carbon:

www.nhbcfoundation.org/Researchpublications/tabid/339/Default.aspx

Port of Leith Housing Association runs the TOiL Programme (Training Opportunities in Lothian) which offers 6 month paid work experience placements to young people leaving school with few or no qualifications; over the past eight years, the programme has supported approximately 400 young people aged 16-24 achieving positive destination outcomes of 80% and above.

SHBVN Scottish Housing Best Value Network a consortium of local authority and housing association landlords working together to drive up performance, meet the demands of Best Value and deliver quality services by means of benchmarking, peer review, good practice exchange and information sharing.

SCDI (Scottish Council for Development and Industry) network of Young Engineers and Science Clubs in primary and secondary schools to engage young people from a range of backgrounds in society with the house-building industry.

Skills Development Scotland 'Our Skillsforce' website to host pages from all Scottish local authorities that detail local skills and employment offers and opportunities; Low Carbon Skills Fund is available to support employers for training.

Sust. 'The Green Directory' is the first dedicated resource for products, manufacturers and service providers of green products in Scotland, referenced according to geographic location to help users to source locally and within Local Enterprise Company (LEC) regions (in partnership with SEDA, Scottish Ecological Design Association): <http://www.sust.org/tgd/>

Waterwise is to launch a qualification and training programme on retrofitting water-using devices in homes to make them more water-efficient, and advising customers on their use, compatible with the Green Deal and accredited by a mainstream body.

Youthbuild equips disadvantaged young people with the skills, experience and contacts to access sustainable employment, in particular in construction.

2) References

Respondents also provided references

Consumer Focus Scotland (2011) Energy efficiency in private sector housing in Scotland: Regulation and the consumer interest:

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Historic Scotland (2011) Technical paper 13: Embodied energy considerations for existing buildings: www.historic-scotland.gov.uk/technicalpaper13.pdf

Historic Scotland (2011) Technical paper 14: Keeping warm in a cooler house: Creating thermal comfort with background heating: www.historic-scotland.gov.uk/technicalpaper14.pdf

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www.wcmt.org.uk/reports/906_1.pdf

Department for Communities and Local Government (2012) [Review of the barriers to institutional investment in private rented homes](#)

SEDA(2006) Design Guide 2: Design and detailing for airtightness:

seda.uk.net/assets/files/guides/dfa.pdf

Zero Carbon Hub, Ventilation and Indoor Air Quality Task Group(2012) 'Mechanical Ventilation with Heat Recovery in New Homes: Interim report'

http://www.zerocarbonhub.org/resourcefiles/viaqreport_web.pdf

Annex D: TEXT OF WWF CAMPAIGN RESPONSE

The WWF campaign provides a standard response, reproduced below. Where the respondent has added substantially to the standard response, they would be recorded as individual and scrutinised as per a non-campaign individual response. <http://campaigns.wwf.org.uk/ea-action/action?ea.client.id=14&ea.campaign.id=16114>

“I am writing in response to the Scottish Government’s consultation on Scotland’s Sustainable Housing Strategy.

I welcome the Strategy’s vision for “warm, high quality, affordable, low carbon homes.”

Homes are responsible for a quarter of Scotland’s carbon emissions and a third of its energy use. At the same time, fuel poverty is increasing – the government estimates over 800,000 households (35%) were fuel poor in 2011. It is critical that this strategy includes the right policies and resources to ensure we meet our climate change targets and eradicate fuel poverty.

In particular, I want to support:

1. A National Retrofit Programme

This should be the over-arching programme designed to meet a 42% reduction in emissions from the housing sector by 2020 and eradicate fuel poverty by 2016. New milestones need to be set to match this ambition.

2. Minimum energy efficiency standards for all private housing

Alongside attractive financial incentives, a basic standard of E on the Energy Performance Certificate scale should be introduced by 2015 at the point of sale or rental. There is no reason why substandard properties which condemn people to high bills and fuel poverty should continue to be on the market. Regulation will drive demand for energy upgrades, and give a meaningful value to the energy performance of homes. Voluntary programmes are not delivering the pace and scale of change required.

3. Net-Zero carbon standards for new build by 2016

The government must reaffirm its commitment to establish net-zero carbon standards (homes that use zero carbon over the course of a year) for new homes by 2016. It is possible to build these homes now at little extra cost. Why settle for less? We need to give homes a more prominent place in meeting our climate change targets – and at the same time win gains for green jobs, and the fuel poor. Getting the strategy right, with the right balance of carrots and sticks is essential

I am replying as an individual and am happy for my response and name to be published on the Scottish Government website, but not my address.

I understand that my name and address are required to identify me as an individual, so that my response can be included in the consultation analysis.”

Annex E: GLOSSARY

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| AHSP | Affordable Housing Supply Programme |
| BTS | Below tolerable standard |
| EAP | Energy Assistance Package |
| ECO | Energy Company Obligation |
| EPC | Energy Performance Certificate |
| FIT | Feed-in Tariff |
| GD | Green Deal |
| HRA | Housing Renewal Area (defined under Housing (Scotland) Act 2006) |
| LBTT | Land and Buildings Transaction Tax |
| MMC | Modern Methods of Construction |
| PRHP | Private Rented Housing Panel |
| SHR | Scottish Housing Regulator |
| RdSAP | Reduced data SAP: normally used for assessing the energy performance of existing dwellings, now incorporated in SAP 2009 |
| RHI | Renewable Heat Incentive |
| SAP | The Government's Standard Assessment Procedure for Energy Rating of Dwellings: the SAP methodology is based on the BRE's Domestic Energy Model (BREDEM), which provides a framework for calculating the energy consumption of dwellings. |
| UHIS | Universal Home Insulation Scheme: Scottish Government area-based improvement scheme administered by local authorities. |

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