Part 2

Pace of Delivery

1. With regards to achieving an accelerated delivery of the standards proposed, do you think mandatory action for owner occupiers would be required? Please provide a rationale for your answer.

The sale would be an an appropriate time. A sale is a clear event. Renovations vary in complexity and size. Some obviously would be be a trigger point. With others it may be so minimal as to not justify it.

2. What trigger points, e.g. sale, renovation, etc. could be used to require owner occupiers to undertaken energy efficiency improvements?

The sale would be an an appropriate time. A sale is a clear event. Renovations vary in complexity and size. Some obviously would be be a trigger point. With others it may be so minimal as to not justify it.

3. When should mandatory energy efficiency targets be introduced for the owner occupied sector? Should they be introduced before 2030?

Not before 2030

Impact of Pace on Supply Chain

4. From a supply chain perspective, do you think bringing forward the timescales for the Programme would have a positive or negative effect on quality, skills & capacity and consumer protection? Please provide a rationale, and evidence where possible.

Both. It could increase job and training opportunities and extra work in the building sector although SMEs that could benefit immensely may not be able to gear up in time to meet demand or compete with larger scale competition

Impact on Fuel Poverty & Climate Change

5. In your view, how would accelerating Energy Efficient Scotland help, and/or how would it hinder, plans to address fuel poverty?

If it works, according to predictions, it will reduce the numbers in fuel poverty at an escalated pace. Enough funding needs to be provided to allow the poorest households to be able to participate.

6. With regards to reducing the emissions associated with the supply of heat, what are your views on consideration of energy efficient improvements alongside changes to heating systems?

In theory is a good idea but unsure as to how practical it is. If extensive measures were required it would be as disincentive to change the heating system. For example a change to Air to Air heating is popular in Orkney. To require internal wall installation in addition may cause some to keep with an old inefficient system based on a number of factors including costs.

Part 3
Private Rented Sector
7. What are your views on using change of tenancy as a trigger to require the increased standard?

It seems like a reasonable trigger although there may be long term tenants that could benefit from the improvements. It seems unfair to penalise long term tenants in this way.

8. What are your views on using 1 April 2025 as the date to start applying the minimum standard of C when there is a change in tenancy?

Improvements should be initiated sooner rather than later but consideration should be made for rural areas where housing stock is poorer, heating options are limited (and generally more expensive) and housing stock can be located in conservation areas which limit insulation options.

9. With regards to providing a useful tool to landlords planning and executing improvement works, what are your views on basing any cap of required works on a definition of cost-effectiveness and technical feasibility?

As above, this will have to be considered. Homeowners have had treasonable access to insulation improvement measures from funds that have been utilised cleverly from Energy Companies non-compliance funds and other government funding.

Part 4

Impact on Supply Chain: skills and capacity
Considering the recommendations made by the Quality Assurance Short Life Working Group:

10. The Short Life Working Group have made recommendations which they believe represent the actions required to ensure that Energy Efficient Scotland will achieve consistently high levels of quality, health and safety and consumer protection. Do you agree? If not, what more or less should be done?

The points are broadly agreeable, although enforcement of high quality standards will add additional cost to the repairs. A benefit of this is that there will be a large database of information so the effects of the policy can be measured robustly in real life application.

Supply chain can be difficult to secure in rural areas, it is often difficult for local companies to navigate the procurement processes. For example, It may be that health and safety standards already employed by installers are already robust enough mitigating the need for works to be 'checked twice' saving bureaucracy.

11. Do you have any views on how this can be achieved whilst at the same time ensuring maximum participation from suppliers across Scotland regardless of their size and geographical location?

Define areas according to their similarities and consult stakeholders there to determine what the impacts are likely to be. Do not attempt to apply a centralised model whereby there may a certain proportion of the population (particularly in rural areas) that may bot fully benefit from the insulation measures (and who often need it the most).

12. What do you think the role of Scottish Government should be in ensuring the quality criteria are consistently met?

Perhaps can enforce an audit to check works, photographic evidence may suffice or using a local survey as a proxy.

Part 5
Heat Networks
Questions

13. Taking the above into account, what further incentives could drive further heat demand onto networks?

Costs effective green production of electricity and incentive to use locally produced electricity locally. Many rural areas have no access to 'heat networks' or cheap rates for gas heating so rely on costly fossil fuels and electricity for heat demand. Note that if it is the plan to better insulate buildings it should ultimately reduce heat demand? There are localities demonstrating the statement in question 13. Real world examples should be taken from communities such as these.

14. Taking the above into account, what further assistance could support the growth of approximately-sited, low carbon heat networks?

Easier access to the local electricity grid, fair carbon pricing for fossil fuel emitters, real-world benefits for green production, support for communities demonstrating a willingness to change. Cost competitiveness for the developer and the consumer to create heat networks.