

4. Please indicate which category best describes your organisation

(Tick one only)

Executive Agencies and NDPBs	<input type="checkbox"/>
Local authority	<input type="checkbox"/>
Other statutory organisation	<input type="checkbox"/>
Registered Social Landlord	<input type="checkbox"/>
Representative body for private sector organisations	<input type="checkbox"/>
Representative body for third sector/equality organisations	<input type="checkbox"/>
Representative body for community organisations	<input type="checkbox"/>
Representative body for professionals	<input type="checkbox"/>
Private sector organisation	<input type="checkbox"/>
Third sector/equality organisation	<input type="checkbox"/>
Community group	<input checked="" type="checkbox"/>
Academic	<input type="checkbox"/>
Individual	<input type="checkbox"/>
Other – please state...	<input type="checkbox"/>

CONSULTATION QUESTIONS

1. Are the vision and objectives as set out in sections 19 and 20 appropriate for Scotland's Sustainable Housing Strategy? Please answer Yes or No and provide fuller explanation if you wish.

Yes No

Comments

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

Quite a broad sweeping question for a very diverse market with homes of different incomes, designs, adaptations and human motivation for change.

The variation of our housing stock is perhaps the main barrier. It makes it complicated to create a simple solution. Either from a technical, skills or finance perspective. We have timber frame, sandstone, granite, brick and other constructions, we have different levels of occupancy, some more efficient than others, and we also have environmental dynamics such as high wind and rain exposure in certain parts of Scotland, all with different forms of fuel source, different orientations to the solar gain, and lastly a complex untrained market of general builders and tradesmen who know little about how to maintain homes in an energy efficient way.

For simple measures such as loft and cavity wall insulation, or even boiler replacement, the market is well established, although you could argue that Green Deal is way more complicated than CERT/CESP schemes, and will (according to DECC) reduce the uptake. Basic measures need to remain easy to install and free or affordable for all.

The second barrier is awareness. People don't see beyond their own front door and their own energy bills, and they also don't see beyond short term issues. Few consider the implications of long term energy price rises, or the need for collective retrofit for the good of 'Scottish Climate Targets'. So in some respect, social housing and private housing associations will have a clearer vision of the challenge than private home owners.

The last barrier and it should not be under-estimated is the scale of the problem, the time available to meet set targets and the pace of change we are proposing to make. Add them together and this programme will fail. We need a war-like mentality to this, to gear up skilled labour, to provide materials at realistic costs, and to drive change on the ground and not in the research labs or in theoretical papers. Our culture is one of caution and not of action. We need to be able to take action today, perhaps quickly leveraging higher standards for scandinavian countries, and to permit a certain level of failure in our journey to a low carbon Scotland. Let's not sit and wait for all the 'I's and 'T's to be crossed before we begin.

Lastly, the scale of the home improvements is being under-stated. While

CERT funded wall and cavity insulation and BSS funding have without a doubt helped, we suspect that the actual savings are not sufficient, and we will need to return to these houses in the future to make more changes. This approach is wrong. We've too many houses to retrofit, and too little time to be re-visiting. We need to focus on area based conversions, right across Scotland and to do it once. Concentrate resources and repeat until all homes are upgraded.

A clear barrier is motivation to change, and this is covered in the consultation, people need rewards and incentives to change, like better deals on mortgages, higher house values for greener homes, etc, and we need less of the 'big stick' mentality of pressuring people to change. Focus needs to be with the willing communities, and with support for those who cannot afford. Driving a focus on pioneering communities will encourage others to follow suit. We need to create the lifestyle changes that people will be attracted to, much as we promote the social aspects of buying a car on TV adverts and not the MPG. ! Lets not get lost in the EPC/CO2 metrics. Mr and Mrs Average in their home don't care if their home is C or D rated. They care about lifestyle choices and options.

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

Businesses and community groups who wish to participate in making a fundamental shift in improving homes need to provide real examples within communities. For existing housing areas, show-homes have been sold and there is no longer any capacity to show what the housing stock potential is. We need to re-invent the show-home in existing housing estates, and open the doors for people to experience the change that is possible in their area.

Taking one home per type per community buying it, doing it up properly and then inviting locals to see the changes, the costs and the benefits. Perhaps even to trial living in that exemplar home too. People rarely commit to change unless they can see and feel it for themselves first. Esp something so disruptive to everyday lives.

In new estates, it's all too easy to visualise and experience the show-home or desired standard. With existing estates we need to bring back the show-house. We need to invest in creating these exemplar homes and to develop a simple cost model which is neutral of the variable costs that will be encountered in reality when we come to roll out regional retrofit. i.e. Scotland should convert 1,000 homes of different types, cost that effort and then work a budget across ALL homes in Scotland and give a single average price for everyone to pay with built in buffers for those who can't afford. It needs to be a one-price solution, as many live in homes where the cost would be beyond any reasonable budget. This is where the Green Deal will fail, as it is putting the cost back on a long term loan which in effect will cost the home owner double the actual cost. GD finance model is a disaster waiting to happen. Scottish Retrofit needs a cleaner finance model. Much simpler, more upfront about costs, no middle-men, and focusing on bulk discounts

through group purchasing of materials and labour.

Get the pricing right, spread the costs across every home (private and public), and implemented via local community social enterprises/CIC's, using local re-trained trades and new employees to deliver.

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

- * Low VAT rates
- * Access to bulk discounts on raw materials
- * Area based teams who are experts in their local housing stock. E.g. Granite, sandstone flats, timber frame, brick cavity, etc.
- * Help with attic clearing, and construction of new storage in lofts as part of loft insulation schemes.
- * Exemplar homes already converted in their neighbourhood so they can see the change and the effort required for their type of house. Eco-Show-Homes.
- * To see a link with local employment, community co-op/CIC's/social enterprises to deliver. Ie that the programme is re-investing in communities, and not just financing external companies.
- * A simple sign-up scheme, and link to rewards and benefits. Ie dealing with energy conservation alone is not enough. People need to get linked rewards and incentives, like lower energy tariffs, cheaper mortgages, etc.
- * Proper marketing that concentrates on the lifestyle benefits of being part of the programme, NOT on the CO2 savings or lower energy bills. A professional marketing team need to manage the awareness campaign, and to show how Scotland is leading and benefiting from the programme.

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

Dealing with additional wind factors, ensuring that homes remain well ventilated too. Also taking account of fuel types available in rural areas, we need to ensure we are helping to find the best solution and not forcing them to have boilers running fuels that they need to import at high costs etc. New windows might need fitting and sheltering trees may need planted for houses in remote/windy locations. Ie we shouldn't just think of the home, but natural protection too, etc.

5. (b) How should these be addressed?

6. Taking into account the models and funding sources outlined in section 1.20-1.37, what role might local authorities and other agencies play in bringing about a step change in retrofitting Scotland's housing?

The Community Sector need to have a large part in this. We know our housing better than anyone else, and need to local employment and empowerment to form Social Enterprises to help deliver that change.

Presumption must not just be for local authorities to be the dominant player in this challenge we face. Many communities could (with help) play a key role in promoting and delivering the change. Esp if it is driven through local community interest charities and trusts. This needs to be seen as a people project, and not a corporate or local authority one. Over domination may smell of big brother mentality and profiteering. Communities need empowered and supported to help deliver.

Perhaps allowing the private sector and local authorities to focus on more complex projects like flats, social housing etc.

A problem shared !... Communities seem to be under-represented in this consultation/plan.

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

Driving for simplicity of finance, simplicity of regulations to enable it to be delivered asap, and removal of planning and building control red tape that will prevent us from meeting Climate Change targets as a national priority.

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

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

The scale of change is massive, and as such we cannot afford to waste time experimenting, we need to accept failure and to budget for making mistakes along the way. We need to start delivering NOW. Funding is needed to deliver pioneering work. We need to experiment and to properly cost the changes we propose, to learn and record the issues we face and to share those across Scotland.

Communities need to be seen as key partners in delivering this change, sharing the effort, and benefiting through local employment.

We need to switch from a demand driven change, to area based upgrades like UHIS. Homes should need to opt out rather than opt-in. Insurance needs to protect all participants.

10. How can we make sure a National Retrofit Programme maximises benefits to all consumers (for example, older people, those from ethnic minorities, those with long term illness or disability)?

The programme needs to focus on making all homes reach an equal high energy efficient standard irrespective of who lives in the home or who owns it.

Doing it on an area basis will neutralise any bias.

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

Yes No

11. (b) If so, how would that be enforced?

12. (a) In box 6 we identify a checklist for maintaining a quality home. Do you agree with our proposed hierarchy of needs?

Yes No

12. (b) If you think anything is missing or in the wrong place please explain your views.

Too complex. Keep it simple, and down to a max of 3 things at most

1. **Maintain your home** – structural, wind, water tight, regular preventative maintenance. – [Zero VAT to encourage this to happen]
2. **Live Efficiently & Healthily** – have an efficient boiler, insulate to the max. fit LED lights, and ensure adequate ventilation [Zero or 5% VAT] to encourage this to happen]
3. **Future-Smart Homes** – Generate your own local energy, use bio-fuels, or GSHP's etc. ie permit people to fit PV/STH, Log Stoves, Wood boilers, heat pumps etc. [5-15% VAT to encourage this to happen].

13. Should local authorities be able to require that owners improve their properties in the same way they can require that they repair them? For example, could poor energy efficiency be a trigger for a work notice? Please answer Yes or No and provide further explanation if you wish, for example on how this might work.

Yes No

We need the 'carrot' not the 'stick' here.

I'm not convinced local authorities should be the regulator or enforcement officer here. If anything, LA's should be offering positive incentives and rewards to compliance. i.e. reduced council tax for maintained homes, not enforcement to standards for which there is no short term benefit to achieve them !

The focus here is that Scotland sees the majority of homes upgraded. Councils should not waste time and resources policing offenders or non-compliance, focus needs to be on incentivising those who are willing to change, not chasing those who wont.

14. Should local authorities have a power to enforce decisions taken by owners under the title deeds, tenement management scheme or by unanimity? For example, should they have explicit powers to pay missing shares of owners who are not paying for communal repair work, in the same way they can for agreed maintenance work ? Please answer Yes or No and provide further explanation, if you wish.

Yes No

No. Incentives need to be positive. This journey needs to be 100% beneficial to the home owner, landlord or tenant. We need to find a financial model here that neutralises all of these problems, not waste time chasing the odd person who defaults on participating in social norms. After we reach a critical point, those left in poorer homes will feel isolated and wish to be upgraded. Let's not waste resources being enforcement officers!.

15. Should local authorities be able to automatically issue maintenance orders on any property which has had a work notice? Please provide further explanation if you wish.

Yes No

See above.

16. Should the process for using maintenance orders be streamlined , and if so, how? Please answer Yes or No and provide further explanation, if you wish.

Yes No

Comments

17. Should local authorities be able to: a. issue work notices on housing affecting the amenity, and b. require work such as to improve safety and security on

properties which are outwith a Housing Renewal area? Please answer Yes or No and provide further explanation if you wish.

Yes No

Comments

18. Should local authorities be able to issue repayment charges for work done on commercial properties, in the same way they can for residential premises? Please answer Yes or No and provide further explanation below, if you wish.

Yes No

Comments

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

Comments

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

Professional marketing expertise is needed here like Futerra. We need to sell the sizzle of the future we want. Not to get lost in techo mumbo jumbo language, as the average man/woman on the street wouldn't know if their home was efficient or not. This is way too complex.

Home owners and tenants need to be shown to be benefiting from the retrofit journey, and those benefits need to be at a social/lifestyle level. I.e. convenience, comfort, time-saving, enabling, etc and not all wrapped up in energy efficiency images, like homes wrapped in blankets etc. The marketing of a national campaign needs to be as smart as the efforts applied to selling TVs'/Cars/Hair products etc.

Equally community groups/charities can be given funding and support to promote at a local level. To add a 'trust' aspect, that the change is worthy of doing. If this is purely seen as a Scot Gov/Council led initiative then it wont work.

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

Unsure. There's 2 issues here.

- 1) The standards of a home's energy efficiency, and
- 2) how we live in these homes.

So we could be in the greenest home in Scotland and leave the heating on 24x7 and the windows open!.

Rather than meeting minimum standards, perhaps we need to be thinking of avoiding maximum consumption levels? Ie reverse the logic.

We should be defining the max. energy that any house needs, and restricting energy consumption, this will allow the home owners to consider the energy demand for heating and appliances combined. Ie no more than X kWh per day/week/year for a type of house, perhaps refined by occupancy levels.

We should also consider inverting the energy bills too so that if you use more gas/elec (above local averages) and the cost per kWh goes up, not down.

Right now we speak of minimum standards, which most people are happy to reach, but it never encourages us to get to higher standards which at a strategic level is where Scotland needs to be to meet it's Climate Targets. Let's reverse the logic here, cap the total energy of a house, tax it in some way if it exceeds a maximum. (but allow for exceptions as there will be some).

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

Include energy usage and not just home design theoretical calcs. EPC's could be used to force homes only to be sold when above a certain standard, and to help the open market guide buyers to choose more efficient homes. Good EPC ratings could drive lower mortgages, cheaper fuel tariffs, lower insurance, etc.

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

We need to consider removing regulations at the same time. Conservation area constraints on renewable energy tech, planning for heat pumps in conservation areas, excessive regulations on listed buildings to put solar panels in hidden locations, etc. We are way too protective of change that is needed and we need to simplify the whole process. Adding regulation has the risk of slowing up a retrofit programme. Priority should be on enabling change, not making more regulations that make it harder.

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

See above. Remove planning rules in conservation areas, esp for houses with no listed building status. We are over-protective of the need to change our housing stock. Lets talk about de-regulation. Historic Scotland etc... free people to make the changes they need to make. Remove the red tape. De-list buildings that don't really need listing, etc.

[]

25. In section 2.68 we identify design options for the standard. Do you have any views on the options set out in that report? Are there other options that we should be considering?

[]

26. Do you agree that any regulations for private sector housing ought to reflect the energy efficiency capacity of the property and/or location, as is proposed for the social sector?

Yes No

[Private and Social/Public sector needs to be identical. No differences.]

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

Yes No

[Comments]

28. Are there other specific issues we need to consider in introducing regulation on the energy efficiency of the home for particular groups of people, for example older people, those with disabilities, people from minority ethnic communities?

[Comments]

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

Yes No

[As stated, a key trigger point is when major building work is carried out. I.e an extension, roof conversion, or fitting of bathroom, kitchen, internal structural work. At any point when there is upheaval, we should consider insisting on the best improvements being made at that time. Currently, kitchen, bathroom, attic conversions are being done with minimal consideration to building insulation. Standards are poor in this sector, this is a big trigger point for making improvements to wall surfaces etc.]

30. Should rollout of any regulation across the owner occupied and PRS sectors be phased or all at once? If you think that rollout should be phased how do you think this should be done?

Yes No

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

Comments

32. In sections 2.76-2.79 we suggest that one way of regulating would be to issue sanctions.

(a) Do you think that sanctions on owners should be used to enforce regulations?
Yes No

(b) Should owners be able to pass the sanction or obligation on to buyers?
Yes No

Avoid. Drive the market through incentives, not big stick sanctions which are most likely to be costly to define, and argue in legal circles. Far better to reward good behaviour, so if we have finite resources to deliver this change, lets focus on defining the benefits. Market forces will then drive a shift to be the social norm.

33. The Scottish Government does not intend to regulate before 2015. The working group will consider what options for timing of any regulation might be appropriate, but, given all the points set out in sections 2.80-2.81, from when do you think it might be appropriate to apply regulations?

The sooner the better, but we also need to be given the freedom now to experiment and to deliver change that is monitored and evaluated by experts to make sure the regulation is going to work. Exemplar pilot work permitted before regulation is a crucial pre-requisite step to ensuring regulation is effective and beneficial.

34. (a) In Section 3.4 we describe the range of legislative and policy levers that we believe are available to help us transform the financial market such that it values warm, high quality, low carbon homes. Do you agree that this is the full range of levers?

Yes No

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

I doubt it is the 'full range' of levers but it does cover some.
As an example, energy should be more expensive per kWh the more you use, not the reverse.
There's a real risk that Green Deal will fail. Where FIT's add potential value

to a home, through repayment of Solar PV, GD has the risk of adding costs to a house that a new home owner will have to take on when they buy. This extra cost may discourage them from buying, and then we lose out on a primary opportunity to upgrade the home at point of sale.

Homes need upgraded as part of the sales process. Perhaps meeting minimum standards, or having basic measures completed before a house is sold. It must have loft insulation, be of good repair, and have an efficient boiler etc.

35. What changes would be required to current survey and lending practice to enable mortgage lenders to take account of the income from new technology or savings on energy bills?

Comments

36. Section 3.15 lists a range of challenges that may prevent the benefits of a more sustainable, energy efficient home being fully recognised in its value. What further challenges, if any, need to be addressed?

Lack of understanding of the benefit of wood stoves, esp for those off-gas-grid.

37. (a) Sections 3.16-3.22 set out the action that Scottish Government is currently developing to encourage greater recognition of the value of sustainable homes. Do you agree that this action is appropriate?

Yes No

37. (b) What further action is needed to influence consumers and the market?

You mention building demo homes. Why not use existing homes and make examples out of existing building stock. Esp. empty homes in estates. We need to take action urgently to build up that level of interest, and CCF funding could be better spent on investing in local communities retrofitting demo homes and starting social enterprises to roll out retrofit programmes than it is currently being used on.

CCF needs to change course and to alter what it is financing.

We also need to change the message. "Greener Scotland"! 'Green' only motivates a small percentage of the population. Well intentioned, but it is ineffective. We need a different 'branding' and marketing strategy to deliver what we need to achieve. Something which is more about lifestyle and wellbeing, Scottish pride, success, meeting a challenge and succeeding, etc.

The message also needs to be spread in equal measures across public, private and community sectors. ie partnerships will deliver the change, and it is for the good of ALL, not just a focus on one sector.

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

Perhaps consulting with sustainable community organisations may help. Recommendations to changing the built environment are to be welcomed, but there is a massive gap between the kinds of lifestyles people think we can live at an 80% GhG reduction level in 2050 vs. the kind of 'greener' tweaks many of the current building and planning regulations are indicating we need to make. i.e. it's not just our homes, and streets, but jobs, travel, vacations, etc. everything will have to change considerably and our priority is to enable that change through open/flexible design.

e.g. Putting a requirement on new homes to have an office space, is lovely in theory, but in practice, without zoned heating controls, people will heat the whole house and make greater carbon emissions in winter than if they worked in a shared office space in a local town!

But that all presumes that we can meet a 80% reduction in less than 40 years with just IT technology to enable work-from home. It doesn't really face the reality that the types of jobs we do will need to change too.

80% reduction by 2050 needs thought out in much greater detail. The likelihood is that the type of work we do, when we do it, and where will change quite considerably, and the existing tweaks to give us 'eco-friendly' neighbourhoods won't be enough.

We need more radical thinking, and integrating business and residential, linking food production into living, and re-thinking a work from home strategy and the CO2 implications. Places need well designed, but we need to start from the end-objective of a low carbon Scotland and build to that, and not tweek what design specs we have today. Gathering knowledge and experience from existing eco villages/communities like Findhorn and CAT in Wales would help.

Think bold. Think different. Avoid just tinkering with the existing models.

e.g. consider co-housing. Shared living space, communal gardens, car-free, multi-age, smaller living units.

e.g. consider homes built only by local materials.

e.g. consider re-shaping or food production and distribution models.

e.g. consider re-thinking the types of trades and skills that will be needed in a low-carbon Scotland.

Working from this base, we may well wish to re-think where we live and in what sorts of communities, with localisation being a top agenda item.

Retaining the same level of dependance on global markets and imports of goods and services will not achieve a low-carbon Scotland, and the consequences of that on how we live, and the jobs and where they operate from will come to be a critical aspect of life.

39. Section 4.10 sets out the main challenges to address in taking forward our aim of new build transformation. What further challenges, if any, need to be addressed?

Very narrow thinking. This presumes that we still want to live in isolated

boxes, and not in models like co-housing. It also mentions that some may resist being early adopters of change!.. This isn't a barrier. Those that wish to be early adopters have those core values (See Common Cause), most of our society is made up of people who will follow trends forged by early adopters, and as such new shifts in how we live in low-carbon homes needs to be driven by willing pioneers rather than to force prospectors to be pioneers themselves.

New build may also need to take on new local materials that are in short supply. The right timber, stone, slate, lime, straw, etc. Building up the supply chain to make homes from sustainable materials is a massive challenge. Just look at the lack of square bairns on farms these days!, and the shortage of good timber too for shingles, timber frame, etc.

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

Take some of the traditional building trades and building suppliers to eco-villages and let them experience building with local materials!. Experiment. Be willing to fail and to learn. Integrate excellent university talent pools like CICstart to monitor the success and failure of early prototypes. Get out of the 'research' phase and start making changes in real communities asap.

41. What further changes to the operation of the Government's affordable housing supply programme would help to enable it to champion greener construction methods and technologies in the medium term?

Open it up to local communities to participate on a not-for-profit basis, or through the DTAS member groups. Locally run housing associations are the perfect vehicle to construct affordable housing and to keep employment and profits locally.

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

Space to experiment, partnerships with willing eco-communities to receive innovative methods and to give feedback. CCF funding has seeded a great number of communities who want to be part of this pioneering work. We want to partner with the construction industry to help make it happen.

43. (a) Has Chapter 5 of this consultation identified the key challenges to ensuring Scottish companies have the skills to take advantage of the opportunities expected to be on offer?

Yes No

43. (b) If not, What other challenges are there?

While most of these challenges are fine for large construction companies, a great deal of housing modifications and small builds are done through very small local builders and sub-contract work to local tradesmen. Few of these have the right knowledge or skills to know how to build low-carbon, many fit high quality insulation incorrectly, or damage existing insulation envelopes with no care or interest in the consequences of their actions. Letting beads pour out of cavities when fitting sockets, or drilling holes without sealing for pipes, etc.

We have a massive challenge to retain the small trades sector. This should not be ignored as they can easily ruin a new-built house. !

Please note this issue and define an action to train this sector properly.

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

Trades colleges need to get existing company staff back for refresher training to latest standards and to give them a certificate to show they are trained to the latest standards. The equiv of Gas-Safe. We need eco-smart accreditation for builders and all tradesmen to prevent a regressive step in our efforts to lower emissions.

45. How can the construction industry be made more aware of the potential funding and support for skills and training development opportunities and engage effectively with those providing training to ensure that it meets their current and future needs?

Comments

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

Community sustainability groups like ours are keen to form new social enterprises to deliver local retrofit programmes, but the barriers to enter the market are massive. Access to Skills and affordable training are key to leveraging this green economy opportunity and driving local improvements in retrofit with local trusted companies who re-direct any profits back into their communities.

47. Apart from training and skills opportunities are there any other issues that should be addressed to make employment in construction and other industries becomes more representative?

We need to develop a new model for retrofit to make it affordable and effective, and one of the best routes is to do it through community interest companies. To meet our targets we need to share the workload and employ many more in the retrofit sector. Leaving it just to the existing construction sector will not be enough, given the timescales and the size of the challenge we face. Far better to direct construction onto the more complex projects and permit communities to fill the bottom of the retrofit market with easier projects to deliver.

48. Please describe any specific difficulties relating to skills and training that apply to those in remote and island areas and your view on how these may be addressed.

Comments