

4. Please indicate which category best describes your organisation

(Tick one only)

Executive Agencies and NDPBs	<input type="checkbox"/>
Local authority	<input checked="" 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 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

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

The cost of installation of energy efficiency measures, getting the right advice and information to install appropriate measures, employing reputable contractors with a track record. Uncertainty over the green deal and uncertainty over the benefits and pay back

- a lack of knowledge and understanding as to what practical measures can be undertaken
- uncertainty about the comparative costs
- anxieties allied to the fact that such measures embrace new and relatively immature and untested technology
- busy lifestyles
- economic recession
- Not knowing where to go or that the Energy Savings Trust exists
- The difficulties associated with emptying lofts and rooms for access

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

It is essential to provide access to good quality advice and information in a form that is understood by the user. Many people will require face to face contact. Provision of energy efficiency measures that really make a difference and that have been tried and tested. Rating system for contractors. Having recourse if something goes wrong. It would be essential to promote the Advice Shop. Promoting the savings that can be made from energy efficiency projects and attraction of investing in measures to improve energy efficiency and reduce energy bills so making property more attractive to buyers.

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

Case study examples are good. Information on energy efficiency installations that have been successful. The need to understand that many of the "easy" measures have been undertaken already and that more invasive work such as solid wall insulation will require a greater amount of

skill and expertise. Reputable contractors that are rated. There should be awareness raising of how energy costs will rise now and in the future. There needs to be national campaigns, websites and models that can be trusted. Importantly there needs to be an awareness of the existing quality of the property. This information needs to be available to householders.

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

There will be issues in relation to cost of installation, accessibility of property, identifying the best types of installations depending on the location. Off gas grid properties present a particular challenge. Higher allowance should be paid under existing schemes to allow for work to be attractive to installers in remote and inaccessible areas.

5. (b) How should these be addressed?

See above. Funding should be made available to discount the higher cost of materials/labour due to distance. Incentives made for companies to base there for periods of time.

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?

There are a number of levels of involvement that Local Authorities can have in relation to retrofit. Local authorities will have to carefully consider the risks and rewards of involvement especially in regard to Green Deal. Experience shows that many households do not take up energy efficiency measures when they are free, consequently there are concerns about how the Green deal will be perceived in terms of value by people when they have to pay for measures through their utility bills. All of the sources outlined in the consultation document refer to Green Deal being available. Therefore, they all assume a Green Deal provider is accessible. In the short-term local authorities will most likely have a limited role in Green Deal until business cases, best practice and the market become clear. The first part of a business case will be the understanding of the current stock condition. There needs to be support available to allow this to be credibly sourced and presented. Local authorities may also have a role in supporting local businesses to re-train. It needs to be clear where other support for this can be obtained. For the delivery stages, the local authority will need to work alongside a number of agencies including Energy Saving Scotland and business to create workable solutions for areas/sections of housing.

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

Scottish Government could have a lead role in a National Retrofit Programme. Scottish Government has a depth of experience in assessing bids and allocating funding. The monitoring of performance of energy efficiency measures is also key in terms of sharing best practice with local authorities. It should ring fence money Energy Company Obligation (ECO) to regional areas of Scotland to allow the creation of programmes to deliver those areas based on the funding provided and the ability to supplement that funding through innovative means (European, industry, borrowing, Green Deal) to reach energy efficiency, fuel poverty and job creation targets. The Scottish Government has a depth of experience in assessing bids and allocating funding. The monitoring of performance of energy efficiency measures is also key in terms of sharing best practice with local authorities. It is still unclear at this stage in the consultation document what National Retrofit Programme is. It appears to refer to funding, Green Deal and list energy efficient outcomes. The Scottish Government should consider setting up or fully supporting a group of local authorities to create a Green Deal provider in order that aspirations in this document can be met. It would be beneficial for the Scottish Government to provide Local Authorities or partnership groups of local authorities and business, with funding to employ officers that can focus on establishing Green Deal. Part of the funding available should be for this, and is consistent with the objective of job creation. There is also a role to lead research into measures that are applicable to house types found in Scotland and in relation to fuel poverty mapping at ward and datazone level.

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

This depends on the additional powers available.

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

There needs to be a much better understanding by consumers of the benefits of energy efficiency measures and what installation will mean for them. This is especially true when people are being asked to make a long term commitment to fund the measures. It is also important where the measures are more intrusive and so less likely to be attractive to consumers. In the longer term, the price hierarchy for larger users should be reconsidered. Consumers need reassurances that investment in the home will increase saleability. ECO (Energy Company Obligation) should be guaranteed to be used in different parts of the UK and not on a first come first served basis. This gives areas the time required to develop the necessary structures to deliver successful programme measures.

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)?

There will be specific issues in relation to people with particular needs. These will have to be dealt with on a case by case basis but there should be sufficient resources in place to provide more assistance to individuals who require it. West Lothian Council has developed an approach to energy efficiency and advice through the Advice shop and the provision of outreach work. The value of a trusted local presence cannot be underestimated. There is a benefit for all consumers in making information as clear as possible and being upfront about the risks and benefits of installing any measures. Make information and offers attractive and accessible.

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?

There is currently a disjoint between standards applicable to owner occupied homes, private rented sector (PRS) homes and those operated RSLs and local authorities (LAs). Whilst there are practical considerations as to the ability of the PRS to meet the same standards expected of RSLs and local authorities (particularly as they relate to co-ordination of structural repairs, maintenance and upgrading), this disjoint current drives an insatiable demand for RSL/LA homes. It is not desirable that this be perpetuated in energy efficiency matters. Regulation of owner occupied homes is however likely to meet potential considerable resistance.

Private Rented Sector: The test point is at the sign of lease. However, tenants may not understand what to look for. They may not see the EPC before the point of signing and may be reluctant to complain about problems for fear of a notice to quit. Therefore, continued involvement of the Private Rented Housing Panel (PRHP) to deal with complaints will be required.

The standard should also apply at change of ownership (see below).

Private (Owner Occupied) Sector: This will be the most difficult to regulate when ECHR issues are considered. The standard should apply at all times, but only be subject to regulation at the point of sale or other change of ownership.

The message regarding owners' responsibility for property maintenance first made clear in the Housing (Scotland) Act 2006 Guidance and reiterated in Paragraph 2.12 must be persistently repeated by all stateholders.

Enforcement Options: Criminal sanctions should be avoided. Whilst the use of criminal sanctions may work with the PRS, experience suggests it to

be highly unlikely that the Procurator Fiscal would view failure to meet standards which affect only an owner occupier's home as being 'in the public interest' to prosecute.

Options include:

- Scottish Land and Building Transaction Tax (replacing Stamp Duty in April 2015) could be used to provide an incentive. A higher rate could be charged for non-compliant properties, with a rebate for purchasers making the recommended improvements within the first year. It would be in the interest of the purchaser to upgrade the property *if* the difference in rate was sufficient for fund compliance measures. Otherwise no action may be taken, which is not what is desired. This absolves the seller from responsibility, but does encourage energy efficiency to be considered integral to any post purchase refurbishment or redecoration. An exemption should be available where no identifiable recommendations are made on the EPC. (This would have to tie in with the current EPC reforms, to ensure necessary improvement recommendations were not simply omitted)
- At the point of Landlord Registration. This would help drive improvements in the PRS, but would not deal with the worst landlords and properties which have so far failed to register.
- At the point of application for an HMO licence, although in many cases this would already be picked up by landlord Registration Controls.

Communal (Mixed tenure) Buildings: A requirement for these to be actively managed or factored would go a long way to maintain and improve property condition.

In relation to energy efficiency, it may not be possible to meet the required standards without cooperation from neighbours. To secure rapid improvement in such buildings, the trigger could be at then first change of ownership.

Tolerable Standard:

The Tolerable Standard should remain as the base standard for fitness of a home. In relation to energy efficiency, it could be slowly raised over time to drive energy efficiency matters. However, poor energy efficiency alone should not be a reason for demolition of a property which could otherwise be returned to productive housing stock. To do so would be counter productive.

Any new or raised standard within the Tolerable Standard will increase the cases coming to LAs and hence duties on them, for which resources are needed.

In any revision, elevated Radon levels should be considered in the Tolerable Standard. This is because improving insulation and draft proofing may give rise to increased internal Radon levels in susceptible areas.

It should be noted that other procedures exist based on it, notably the allocation of housing points in many local authorities. Raising the standard will have a significant (and potentially disproportionate) effect of local authority housing waiting lists.

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.

The need for a plan should be the first item. Very few home owners have a coherent plan to proactively check and maintain their property. Most wait until problems are obvious, with water ingress into living quarters is often the first trigger for action, often when much preventable damage to, for example, timbers has already occurred over an extended period.

Item 2 should encourage the use of 'Trusted Trader' and similar 'quality control' schemes to minimise the chance of poor or inappropriate repairs.

Not everyone has a boiler, so could be rephrased to 'Check whether your heating system is as efficient as it can be, and if it's not, consider improving controls, or replacing it.'

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

In principle, the ability to require improvements would be a useful power. However, this comes with caveats:

- The duty to provide 'assistance' is generally limited to provision of advice.
- Works notices are not designed to secure improvement of properties, simply returning them to their 'original' condition. The existing powers should be amended to permit incidental improvement in energy efficiency, such as provision of more easily insulated pitched roofs replacing flat, solar heating panels integrated in roof replacement projects etc.
- Whilst local authorities have powers to do so in relation to substandard properties currently, follow through when owners do not comply does not happen. This is because no budget may exist to pay for works in default of the statutory notices. Local authorities are reticent to spend recoverable expenses due to the risk of under

recovery.

- Repayment Orders for recovery of costs on works in default of notice are extremely bureaucratic to use (and have associated legal costs) and local authorities remain uneasy about the repayment timescale of up to 30 years. Local Authorities' finance systems are in some cases unable to manage the 30 year repayment term.

The same difficulties will likely affect any form of statutory improvement notice.

Such a provision, if implemented, would considerably assist local authority housing services and other RSLs to secure necessary energy efficiency upgrading in mixed tenure blocks. Currently owner occupied and PRS properties can delay projects increase costs for LAs / RSLs and in some cases prevent upgrading. Even with significant financial incentives, some private owners are unwilling to become involved in scheme upgrades or repairs.

New powers bring new responsibilities, expectations and demands. There would be a significant increase in the work load for local authorities, which would need funded. Consideration should be given to the possibility of funding coming from the retrofit programme or possibly 'Green Deal' sources.

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

In principle, the ability to enforce majority decisions made under the TMS would be a useful power. However, this comes with caveats:

- Enforcement comes down to two things – the ability to follow through and do works in default or to impose some form of penalty for non-compliance (directly by 'fixed penalty' or via the Procurator Fiscal.)
- No budget may exist to pay for works in default of the statutory notices. Local authorities are reticent to spend recoverable expenses due to the risk of under recovery. This would be an additional financial risk.
- Repayment Orders for recovery of costs on works in default are extremely bureaucratic to use (and have associated legal costs) and local authorities remain uneasy about the repayment timescale of up to 30 years. Local Authorities' finance systems are in some cases unable to manage the 30 year repayment term

This power, if provided, would increase the effectiveness of Tenement management Schemes, by giving them the necessary 'teeth'. Knowing the scheme to have 'teeth' would encourage those not in favour of proposals by other owners to engage with the process.

New powers bring new responsibilities, expectations and demands. There would be a significant increase in the demand for local authority intervention, which would need funding. It must sit alongside the resources to be able to pay the missing shares (or the full improvement works) and recover them at a later date. For some local authorities this will not be a financial priority.

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

Whilst it is recognised that poor condition may adversely affect energy efficiency or negate gains made, the proposal seems to replicate the current position given in paragraphs 2.5 and 2.6 of 'Implementing the Housing (Scotland) Act 2006: Advisory Guidance for Local Authorities: Volume 3 Maintenance'. Local authorities may already issue Maintenance Orders, irrespective of whether the property has had a works notice.

Maintenance Orders requiring maintenance plans need to be backed up by sufficient resources to follow through, including if necessary development of a plan and implementation of it. This is seldom done due to the administrative burden involved.

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

Experience suggests that maintenance orders are most likely to be required for large, mixed tenure flat properties. There is a considerable amount of work required to:

- Liaise informally with residents and landlords
- Identify conclusively who all owners in the building are, requiring extensive property searches to be carried out
- Prepare individual maintenance orders
- Serve individual maintenance orders on all properties, owners, landlords and creditors concerned
- Register the Order
- Assess any plan forthcoming
- Notify all interested parties of the outcome of the assessment of the plan
- Draw up, or amend a plan if necessary
- Implement a plan

The necessity to write to so many different parties and to formally register the maintenance plan seems excessive.

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

There is existing demand to deal with 'eyesore' properties which are out with Housing Renewal Areas. These are sometimes dealt with under Section 179 of The Town and Country Planning (Scotland) Act 1997. However, these powers are not always suitable, leaving communities feeling unable to resolve 'eyesores' in their midst. Therefore, the ability to deal issue work notices relating to amenity is to be welcomed.

However, given the potential latent demand, resource implications could be considerable, not just short term but in the long term to keep 'eyesore' properties presentable.

How such a power would be used in practice would depend on the available resources and the extent to which government and local authority policy regarded the matter as a priority.

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

It would be useful to have this power, but only where the commercial property formed part of a building also containing homes, commonly a ground floor shop. (This aligns with existing Housing (Scotland) Act 2006 guidance). The ability to issue a repayment charge would reduce financial risk (but potentially increase repayment timescales) for local authorities when recovering expenses for works in default of a statutory notice.

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

Option 4 is our preference but on the proviso that there is a replacement factor in place.

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

Government and local authorities need to keep reiterating the key messages, principally by provision of information and advice. Emphasise

the financial benefits of energy efficient housing and the real savings that can be made in relation to expenditure on energy.

Consideration should be given to all adverts for sale or rental homes to include 'front of pack' energy efficiency ratings to raise awareness and make it one of the first things the customer or tenant sees when considering a property.

There should be restrictions or premiums on transferring property where basic energy efficiency measures have not been carried out.

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

Yes, but standards are only relevant if both enforceable or have tangible financial incentives attached. They will have little worth if only a guide. They should apply at all times, but only be enforceable on owner occupier homes at the point of change of ownership.

Standards should be outcome, rather than measures based, to allow flexibility in meeting them. In certain difficult to treat or historic properties, there must be an ability to apply for an exemption.

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

Reference should be made to the Environmental Impact Rating and what it should be for that individual property.

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

The ones that have been set out adequately cover what is required.

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

Need to introduce incentives combined with an awareness raising campaign.

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?

Options 3 and 4 seem acceptable within the context of better public awareness, public campaigns and increasing urgency. Could this be tied to EPC so that properties are assessed at point of sale/ownership transfer,/relet and where they are not meeting the standard, there is opportunity for intervention by the Local Authority to provide advice and information. Could it be a condition of sale/let that properties must achieve a minimum energy efficiency similar to that being suggested for England

and Wales?

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

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

Although it is likely that some private sector houses will require a greater amount of investment to reach the same standard as social rented housing due to previous investment by Councils in SHQS.

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?

There will be specific issues in relation to people with particular needs. Explanation of why regulation is necessary for all sectors of the population is important but there will be particular households that require greater assistance and support. These will have to be dealt with on a case by case basis but there should be sufficient resources in place to provide more assistance to individuals who require it. There may be opportunity to work with partner agencies and existing support networks to assist in the provision of advice and information on the regulation.

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

Yes No

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

The least energy efficient homes should be targeted first. Need to have clear communication on the standards with information and support

available.

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

Please see above.

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**

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?

2015 onwards seems reasonable. There will be a need for a lead in time so that homeowners can be made aware of the changes proposed. There is also a need to link it with funding availability such as the Green Deal so that there is as soft a start as possible before enforcement is used.

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?

The information set out seems to cover the main ways in which the market could be transformed for more energy efficient homes.

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

As noted, valuations need to take account of EPCs with higher values being placed on energy efficient housing. Mortgage lenders should be more willing to lend on energy efficient housing as it will mean greater affordability for the household acquiring the property. As energy costs become an

increasing part of household outgoings, it is important that this is taken into account when assessing affordability. There is a need to emphasise that more energy efficient housing will reduce household running costs.

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?

The main problem generally is about banks being risk averse to lending and the lack of value that is placed on energy efficient housing relative to other matters. Need to raise awareness amongst lenders of the benefits of energy efficient housing. There may be a role for Bank of England and the Scottish Government to encourage greater support by banks for lending for energy efficient homes and projects.

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?

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

We need to consider who will live there and what their requirements will be both now and in the future. We need to ensure that sustainability is at the heart of what we do and that it is a key aspect of neighbourhood design. It is essential to ensure good transportation links to enable people to access the services they need. Design of neighbourhoods is important but this also needs to take into account the long term management and maintenance of homes and neighbourhoods. The use of innovative technologies can be beneficial but we need to be aware of the risks associated. It is important that developers construct housing that is flexible, that can be adapted easily and that can meet the needs of a range of households.

The Council, as local planning authority, produces Supplementary Planning Guidance (SPG) on a variety of subject matters in order to explain how particular local plan policies should be applied in practice, and of particular relevance is the new draft Residential Development Guide (RDG).

The draft RDG is specifically related to medium to large scale residential developments i.e. where more than 10 dwellings are proposed, or, in the case of outline applications, sites with a capacity for more than 10 dwellings.

In accordance with Scottish Planning Policy (SPP), the draft RDG specifically encourages high quality and innovative housing developments

designed on environmental sustainability principles and low in carbon emissions.

The guidance is however very much of an advisory nature and stops short of being prescriptive. It is acknowledged that Building Standards have the lead role in addressing issues allied to energy efficiency and sustainability but it is, nevertheless, legitimate for the council, as planning authority, to also fulfil the responsibilities it has been given under the Climate Change (Scotland) Act.

This states that local development plans must require all new buildings to be designed to avoid a specified and rising proportion of the projected greenhouse gas emissions from their use through the installation and operation of low and zero carbon generating technologies.

The council is at the same time anxious not to inhibit development by putting in place unnecessary development and policy guidance that could inhibit the viability of potential developments, particularly in the current economic climate.

It is therefore considered advantageous to have nationally applicable standards rather than relying on SPGs and local requirements in order to avoid disadvantaging one local authority area over another and to ensure the creation of a 'level playing field'.

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?

We need to have more and better examples of the use of innovative technologies. The Housing Innovation Showcase is a good example but monitoring of these initiatives needs to go on over the medium term so that we can be confident about their benefits. There needs to be leadership and commitment to high quality housing across all sectors. Building standards need to be high and should apply immediately they come into force.

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

The construction industry would have to be confident of the benefit of the innovative methods of construction and that properties built could be sold. This is a challenge in the current downturn with some banks being risk averse to funding projects at scale. There is also the risk that innovative construction methods may not be acceptable to mortgage providers. It is important to share best practice and providing evidence of the benefits of innovative methods of construction and the implications of long term maintenance. Traditionally social housing providers have trialled innovative construction methods to varying degrees of success. The required step change which has been discussed is unlikely to come

about on its own without there being some intervention by government to make it happen. While the market may in time come round to embracing higher energy efficiency standards and design, it probably needs there to be an element of compliance to expedite delivery.

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?

The AHSP has recently provided enhanced subsidy for more energy efficient housing. The success of this approach should be monitored to see if the subsidy is sufficient to encourage increased construction of energy efficient homes.

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

Improved building standards will help to deliver more greener homes. The market needs to change so that renewable technologies become the norm not the exception in housing developments. The valuation of properties is key to this. For social housing providers, the whole life costs need to be considered as much as the upfront capital costs. Making homes as energy efficient as possible is essential for social housing providers as many of their tenants are on low incomes.

Educating and making home buyers more aware of the economic and environmental benefits of energy efficient housing is considered critical in order to achieve the momentum needed to change attitudes.

The development industry is fundamentally demand responsive and it therefore needs to be incentivised if it is to significantly change its product offering. It is only when prospective customers start demanding more energy efficient housing, and in sufficiently large numbers, that we are likely to see product innovation and any meaningful changes taking place. To succeed, it's necessary for energy efficient 'green homes' to become the norm rather than the exception.

At the same time however, there needs to be sensitivity to current economic conditions and an appreciation of the difficulties being experienced by the house building industry. Such a climate is clearly not conducive to change and it may be that expectations of what can be achieved will need to be managed over a longer period of time than may have originally been envisaged.

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?

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

Need to highlight the range of opportunities available through green technologies. Schools, colleges and Universities need to be able to provide the appropriate education and qualifications. There will be opportunities for apprenticeships and work placements within organisations so that their staff have the skills required to keep pace with technology.

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?

Provision of information on the benefits of training and recruiting staff with the relevant skills. Having accredited professional bodies to take a lead role in the promotion of the "green" opportunities. There is also the need to develop skills in relation to repair and maintenance of retrofit technologies. There is also the need to educate consumers so they understand what the technologies require by way of maintenance and repair. It is important that this is not overlooked if the emphasis is on installation only.

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

There needs to be equality of access to training and promotion of the career opportunities through networks where construction, repair and maintenance have traditionally not been a career of choice.

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?

As above.

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.

No comment