

**4. Please indicate which category best describes your organisation**

**(Tick one only)**

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

This council would fully endorse the overarching vision and objectives of the proposed sustainable housing strategy i.e. to deliver "warm, high quality, affordable, low carbon homes and a housing sector that helps establish a successful low carbon economy across Scotland."

This would be fully in accord with the vision, aims and objectives of our own Local Housing Strategy and the council's corporate goals and commitments. Delivering a step-change in the provision of energy efficiency homes by 2030; meeting the fuel poverty target by 2016; contributing to climate change targets; and realising associated green jobs in the construction sector are all strategic priorities that this council would support and is actively engaged in promoting.

However, we also recognise that this is a highly ambitious and challenging strategy and while the general principles are to be welcomed it is important to acknowledge the current realities of the resources available to local authorities and the limits of their sphere of influence on some of the key drivers and factors underpinning these environmental challenges. The strategy must focus on what is achievable and practical. It is also important that an appropriate balance is struck between the twin objectives of reducing carbon emissions and tackling fuel poverty – and to ensure that these do not conflict or pull in divergent directions but deliver mutually beneficial synergies.

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

- Lack of awareness/information on options, long-term benefits, sources of support & advice.
- Initial costs/resources & uncertainty (lack of confidence) in long term pay back schemes (particularly for the ageing population).
- Lack of agreement/buy-in/co-ordinated approach in mixed tenure blocks and for common responsibilities.
- Age/type of properties – many hard-to-treat, off-grid homes.

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

- Improved, coordinated and strategically targeted information & advice at national and local level.
- Incentives such as grant aid/loans; tax benefits or other "rewards" for improved properties.
- "mediation" type factoring services available independently to promote common works and tackle obstacles in joint ownership/mixed tenure properties.
- Linking private landlord accreditation to energy efficiency standards.

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

It is vital that the proposed strategy should recognise and address this diversity in local housing stock and that local authorities have powers to deliver flexible programmes and support appropriate to their varying stock profiles and local circumstances. We would generally endorse the following principles proposed by the Fuel Poverty Forum to underpin the proposed strategy, i.e.

- Area-based, whole-house retrofit programmes to achieve economies of scale where possible (however, important not to raise false expectations);
- Enabling measures such as assistance with e.g. loft clearance and scaffolding to overcome potential barriers to uptake;
- (particularly relevant) Provision to address the issues associated with owners unable or unwilling to support joint works in mixed tenure blocks which prevent improvements for social landlords;
- Continued Scottish Government support with heating systems and insulation to complement specific support provided by energy companies.
- Co-ordinated, cross-tenure information, advice & assistance services, including welfare rights and income maximisation.

**NB.** We would also note that it can be counter-productive for retrofitting to focus primarily on “numbers” (i.e. output rather than outcome). Where installers are paid per installation then there can be a natural tendency to maximise income from numbers of installations irrespective of the suitability of a particular installation. We are aware of a number of solar PV installations (with 25 year pay back periods) on tiled roofs that will require replacement in 10 years and will therefore need to be removed and refitted. A number of properties have actually been rendered BTS due to penetrating damp as a result of inappropriate cavity wall insulation which now requires to be removed. In this context, guarantees are perceived to be of dubious worth and overall far greater quality control is imperative.

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

Argyll & Bute has the highest percentage of pre-1919 properties in the country, along with Edinburgh, (both 31%). There are high SHQS failure rates in both private and social sector stock and a significant level of BTS in the private sector. Dwellings in the rural and remote rural or island areas more often fail the standard and are more likely to be occupied by older people, single persons and those on low incomes and insecure or seasonal, multiple employment. A significant proportion of the authority area is off-grid and unable to benefit from gas heating. As a consequence of this stock profile and rural geography, there is limited scope to make viable energy efficiency improvements in many older house types, making it more problematic and more expensive to meet the SHQS or Tolerable Standard

and also results in greater risk of people living in fuel poverty. Experience in this authority has shown that, while initiatives such as UHIS are very welcome and have a contribution to make, there remains a significant proportion of local stock which is unsuitable for treatment or which requires more intrusive measures which are not attractive to owners and likely to put many households off from seeking improvement action. Rurality exacerbates all these issues and also leads to general difficulties in access and increased costs in terms of delivering installations/services across a dispersed housing stock.

5. (b) How should these be addressed?

Rurality factors could be ameliorated to some extent by central government prioritising the extension of gas grid connections to remoter areas, and by extending targeted resources such as the proposed Warm Homes Fund to promote community renewable & district heating schemes and other initiatives where appropriate.

In terms of existing stock, it is important to maximise access to the available range of local, national and European resources however it is also crucial to promote a more strategically integrated, coherent & consistent approach to the often confusing and complex framework of funding streams, initiatives and diverse projects.

Subsidy should be a percentage of installation costs rather than a flat rate.

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?

While there is a plausible view that retrofitting activity will be delivered in the main by external, specialist agencies (i.e. information & advice delivered via ESSACs and installations by registered contractors) nevertheless we believe that local authorities can have a central role to play in the promotion, delivery, enforcement and monitoring of the proposed strategy and specifically in bringing about the desired step-change in retrofitting Scotland's housing. Councils however will require a degree of autonomy and flexibility to facilitate the retrofit programme in the most effective and appropriate way to suit their local communities, local needs and circumstances. This role would sit well with the council's overarching responsibility as strategic housing authority and its co-ordinating role for local projects and services that deliver energy efficiency measures and tackling fuel poverty.

In particular, this would help to ensure the essential synergies are achieved across these retrofitting measures and the promotion of local jobs and growth of a greener economy.

The council will also be in a position to co-ordinate access to and maximise the impact of the diverse range of funding models and sources of investment however we would advise against an over-reliance on the historic challenge fund processes and the push towards innovation often for its own sake. A consistent and sustained investment framework will be essential to achieve the step-change required and to effectively deliver the outcomes of this proposed strategy over time.

The Council's role would have to embody both support (carrot - through grant aid, financial assistance, tax relief, information & advice etc) and regulatory enforcement (stick – legal sanctions, financial penalties etc). The local authority could have a significant role to play in promoting the Green Deal and associated funding models however there are concerns about the necessary critical mass for delivering these options (we understand that the focus will be on the alliance of urban authorities) and whether they will be feasible within a rural context.

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

Promote and sustain national investment for the retrofit programme, warm homes, green deal etc. Ensure Scotland secures appropriate proportion of the UK ECO budget and that the estimated requirement for £200m per annum is guaranteed. At a national level, promoting the extension of the gas grid to provide equitable service for rural and remote areas should be a government priority. National publicity, information & advice provision and targeting funding mechanisms direct to property owners.

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

No comment

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

The current system which focuses on a limited pool of contractors and prioritises job creation schemes may actually be a constraint on large scale growth and on the required step-change. The use of installers, basically set up as job-creating schemes, neuters the role of the owner in being responsible for who does what to their house, excludes the wider construction industry, and limits the experience and training of the workforce to a very low level of construction competencies. A more open and accessible approach which allows the whole construction sector to participate could be a positive move forward.

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)?

Evidence from both national and local house condition surveys indicates that a disproportionate number of older persons occupy the most problematic and hard to treat properties across all tenures. It is essential that these vulnerable households benefit from the proposed retrofit programme and receive priority targeting. The proposed area based

programme that aims to retrofit housing of all tenures and construction types on a street by street basis is likely to be the most effective and fairest way to deliver improved energy efficiency in existing homes and to ensure that vulnerable households with particular needs are not subject to further discrimination. However, it should be noted that the general principle of pay back over a 25 year period is unlikely to be attractive to the most vulnerable and in particular to the elderly. This is tantamount to a long term gamble with no real guarantees and many households may never actually realise the benefit. Independent financial advice should be available as a minimum and it is imperative that a full and detailed equality impact assessment is carried out for the final Sustainable Housing Strategy as well as the specifics of the retrofit programme and that the results are widely published. Ensuring that the linkages between energy efficiency and the general health and well-being agenda are promoted and clarified in public consciousness may help to encourage pro active engagement from certain equalities client groups. Enhance the role of Care & Repair (or similar model) to deliver targeted information & support on Green Deal etc, to vulnerable clients (elderly & disabled)

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?

We agree that people should be encouraged and supported to take responsibility for the condition and energy efficiency of their homes, and that a single standard across tenures would help to deliver this objective and promote the necessary culture shift. While the public sector should, and has, taken a strong lead to date in delivering an improved housing stock with efficient energy efficiency measures, there are also compelling arguments for introducing more rigorous (albeit flexible) measures in the private sector which constitutes the major proportion of the housing stock and therefore has the greatest impact on carbon emissions and factors affecting the environment in general. It seems appropriate that private sector renters, landlords and owners should be subject to, and benefit from, a consistent minimum standard to be enforced at point of sale or re-let. Minimum standards would support and complement voluntary incentives to drive demand across the board for energy efficiency measures and should ensure that no homeowner or landlord would be overly burdened with unreasonable costs. However, the onus should be on owners to comply, with significant and meaningful penalties for non-conformance. Monitoring & enforcement should be proportionate and appropriate. Local government currently lacks the resources to enforce the tolerable standard effectively and any higher standard is only likely to compound the problem. There is also a potential counter-productive effect of implementing a mandatory condition standard, whereby difficulties with common repair could actually result in a significant increase in empty, unsellable or unlettable properties.

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.

No changes/additions

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

Where owners refuse to finance or sanction improvements in mixed tenure properties thereby blocking RSLs programmes for delivering the SHQS, there would be obvious benefits in allowing local authorities to take action such as serving work notices in relation to poor energy efficiency. However, we accept that this would probably be insufficient in itself to drive effective action in many cases and the local authority will be unlikely to have adequate resources to pursue enforcement. Notices should therefore only be served

- To require private lets to meet standards on re-letting
- On common work
- On empty homes
- On sale of sub-standard property.

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

Discretionary powers should be available to local authorities under certain circumstances however this would be resource-intensive and require careful administration and monitoring. Local government lacks the resources to enforce current powers and therefore without substantial, additional investment, new powers would prove ineffectual.

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

There needs to be a direct and effective correlation between issuing work notices and follow-up maintenance orders when required to ensure action is taken. Without resources to monitor whether or not notices are being complied with, and significant penalties for non-compliance by owners, then such action is unlikely to have any greater impact than current information and advice strategies.

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

The process should be as simple, timeous and direct as possible and streamlining of all bureaucratic processes would be beneficial.

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

As above, the fundamental issue is about resourcing such powers/actions adequately. Given that the scale of the problem with regard to disrepair under current legislative arrangements far exceeds available resources, any new proposals will be academic or moot without substantial, additional investment.

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

See response to Q. 17, above

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

The proposals in the consultation paper for options 2-4 are sensible and appropriate, i.e. providing suitable guidance to owners, reducing the periods for which manager burdens are applicable, and supporting a simple majority of owners to dismiss and replace unsuitable factors in specified circumstances. Encouragement and support should also be available for owner associations to actively manage their own properties in preference to the default of abdicating responsibility to factors. This could facilitate

improvement and maintenance action in certain circumstances. Option 1, i.e. the status quo or taking no action, is not an approach likely to promote positive progress.

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

Continuing to provide high quality information, advice & customer support services on property maintenance can raise awareness and educate owners and tenants on the longer term benefits both in terms of cost savings and health & well-being improvements. In addition, the use of key trigger points to highlight minimum standards and requirements such as Energy Performance Certificates will help to promote the necessary culture change albeit this is only likely to be achieved over time. Positive tax benefits and punitive regulatory measures will ensure the importance of energy efficiency is directly associated with a property's value in cash terms.

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

Yes, see responses above. The private sector has greatest role to play in delivering green standards and meeting climate change targets. Additional regulations on public sector without similar regulation of the private sector would introduce further inequalities and inconsistencies across the housing system and could be perceived as a punitive imposition on a sector which has already made significant progress in this area. While monitoring and enforcing standards in the private sector is likely to prove complex and may be resource intensive, this does not condone a focus solely on the easier and more amenable public sector.

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

There may be limits to the influence that EPCs actually exert over behaviour. In principle, we would agree with the view that the standard should be set at the EPC level of E by 2015 and raised to C by 2020. Voluntary incentives alone are unlikely to affect behaviour change.

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

We agree that regulation must complement a package of incentives, and that standards should be clear, easy to understand and appropriate to local housing types, and above all must be affordable to deliver and equitable.

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

Among the various options for incentives outlined in the consultation report, we would support the provisions of the Climate Change Act to offer council

tax discounts for improving energy efficiency of properties and utilising the new devolved land and property transaction tax (in place of stamp duty) to promote the cost value of energy efficiency in the longer term

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?

A variable EPC rating would certainly be one potential approach, but we agree that the private sector standards should reflect the outcomes of the EESSH consultation and that consideration should be given to the wide variation in house type.

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

This would help address the critical issue of mixed tenure blocks and hopefully resolve potential anomalies arising from different standards applying to different units in the same scheme.

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

As above.

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?

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

Yes  No

These would be the main and critical trigger points.

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

Whatever rollout process is preferred, regulation would require adequate lead in time, particularly for local authorities to plan & develop appropriate structures & procedures.

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

Agree that cost & resources is of primary concern but also capacity, processes and suitability of existing structures (such as Private Landlord Registration).

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 X No

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

Local authorities could have a central role to play in enforcement for both owners and private landlords and sanctions could include financial penalties and restrictions on sale or rent. However this will be complex and onerous to administer and would require additional resources/in house capacity.

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?

See response to Q.30 above. We agree that regulations should not be implemented prior to more detailed development work and review/evaluation of various relevant timescales/initiatives.

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 X No

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

We agree that a significant culture shift is required in the housing market over and above individual behavioural change, to achieve the climate

change targets and greener vision underpinning this proposed strategy. Crucial to such a shift must be the perception of added value (specifically financial value) derived from improved energy efficiency in properties. Valuation practice in private sector housing will need to change fundamentally and refocus on energy efficiency attributes before the general consumer begins to accept this as the norm. However, caution is required to ensure that such a policy does not impact adversely on the housing market. If higher energy efficiency standards in the private rented sector resulted in higher rents being charged, for instance, this would be counter-productive and have consequences for the delivery of local housing strategy objectives.

As noted earlier, we support the use of the new land and buildings transaction tax as a mechanism to promote energy efficiency by way of tax relief at the point of sale and also approve in principle the other legislative and policy levers outlined in the consultation paper.

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?

No comment.

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?

All of the listed challenges are significant and pertinent but we would particularly agree that current uncertainty over the Green Deal is likely to inhibit uptake. We have also indicated in previous response, that there is evidence of poor or inappropriate retrofit installations actually rendering properties BTS and therefore obviously depressing the value. All of these challenges will need to be addressed if the required culture shift has any chance of being achieved.

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 X No

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

We would agree that there is a need for a combined approach which encompasses support for bottom-up, individual, behaviour change as well as top-down, social shift via community engagement. The “material” impact of infrastructure and technology obviously has a significant role to play however we would caution against the promotion of overly ambitious and un-piloted models in this context. A number of local RSLs have been extremely pro-active in exploring new models of energy efficiency in their developments (the first passivhaus scheme in the country; biomass district heating systems/locally sourced fuel systems etc) which are to be

applauded and do produce positive benefits but which have all presented initial teething problems and challenges.

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

It is important that new greener homes are fully integrated into sustainable neighbourhoods and that individual properties function within appropriately designed locations. Wider linkages with local transport networks and amenities should be given due consideration in place-making policies and it is crucial that new developments continue to meet the varying needs of the ageing demographic over time.

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?

The challenges set out in the consultation document are certainly all relevant but the primary issue must remain the lack of resources, and the impact of a depressed housing market and the current economic climate, in particular constrained public sector investment and limited access to private finance. This Council and its RSL partners constantly struggle to deliver new build affordable housing at the existing subsidised benchmark unit cost and the additional grant allowance for meeting greener standards (£4,000) is unlikely to be achievable in many of our remote rural and island communities. Raising building standards over time may be necessary to achieve the strategic objectives for energy efficiency (and we are in principle supportive of the move towards net-zero carbon new build standards as recommended in the Sullivan Report – it would appear counter-productive to continue to create more homes which will subsequently require costly upgrading in the near future) but at a time of reduced grant for new developments this may severely constrain the delivery of the overall goal of increasing affordable housing. In addition, we would agree that there is often a degree of reluctance among some consumers to act as “early adopters” of untried or innovative construction designs and methodologies.

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

The promotion of successful examples and proven case studies with the potential for replication is a useful start but we would have some concerns, along with our RSL partners, regarding any move towards centralised procurement and resultant limitations on opportunities for local economic benefits. The regional approach to procurement has been raised in the past and certain concerns have been voiced in previous consultation. Any review of this process must be fully inclusive and carefully considered.

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 certainly has a central role to play in the promotion & delivery of greener developments and the extension of the IIF is positive, and, in terms of subsidised new build developments, the higher benchmark figure currently applied in Argyll & Bute and other remote rural areas is to be welcomed although we do not believe the additional “green” element of the grant for enhanced design and energy efficiency standards (“silver” standard) is sufficient to achieve the necessary quality in our remote and island communities. RSLs and developers continue to struggle to achieve financially viable packages to deliver minimum standards let alone these higher standards. The move towards longer term resource planning assumptions (3-5 years) is to be encouraged and will facilitate forward planning and greater commitment to developments that generate efficiencies in procurement in order to fund greener construction methods and the development of new technologies.

At present this council is actively supporting the local SHIP and SLP via its Strategic Housing Fund with a view to encouraging quality design and high standards in RSL new build projects. There is already a strong partnership approach across the local authority services and RSLs within Argyll & Bute and it is not immediately clear that further changes to a more regionalised procurement approach would necessarily prove beneficial.

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

The implementation of the Sullivan Report recommendations on increased Building Standards are probably necessary to drive innovation and to mainstream more energy efficiency construction methods, however we have previously noted potential issues and conflicts that may arise as a consequence.

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?

We have noted earlier, that there is already evidence of inadequate and inappropriate retrofit activity having occurred and therefore it is essential that the opportunity to develop and maintain a trained and skilled workforce to deliver the sustainable housing strategy should be pursued. In addition to the potential to create jobs in construction and refurbishment, the retrofit programme and Green Deal will require skilled specialists to provide high quality energy and welfare advice. Therefore, investment in skills and training is essential and must be sufficient to ensure a skilled and adaptable workforce continues to support the local economy.

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

We agree with the proposals set out in the consultation document (5.6-5.13). Long term commitments of employment opportunities within the sector/industry for trainees & apprenticeships are crucial.

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?

We would suggest that it is necessary to engage with the construction industry boards at an early stage to encourage their active support for the strategy and to utilise their networks to encourage participation by their members.

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

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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?

Early & pro active promotion of the construction & retrofit industry in schools and within the education system and targeting of job seekers and unemployed would help raise awareness of existing or potential opportunities for all. Increased options for flexible work arrangements would encourage uptake from females and other equalities groups.

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.

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