

**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

The vision covers the main areas which must be considered in order to deliver the required contribution to climate change targets and to help ensure that no-one has to live in fuel poverty. It is particularly important that focus is placed on retrofit to existing homes and to changing views of energy efficiency in the financial market. These areas are likely to generate the biggest impact on progress. The scale of the challenge in delivering these targets should not be underestimated, particularly for private homes and will require information, financial support and enforcement.

Fuel poverty will not be ended by improving the condition of homes alone. There needs to be a major emphasis on behaviour change and in ensuring that people understand how they can most efficiently use energy in their homes. There also needs to be recognition that income and fuel prices will affect fuel poverty. These areas are much more difficult for either the Scottish Government or local government to influence.

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

In Edinburgh, 65% of homes are flats and almost half were built before 1945. As a result the main barrier in Edinburgh is the lack of methods to improve energy efficiency in tenements and other hard to treat properties.

Other barriers include:

- lack of clarity that the benefits of installation outweigh the costs;
- lack of impact on long term capital value of homes;
- the need for capital to pay the up-front costs (particularly in lower value first time buyer properties);
- potential disturbance during installation;
- dealing with properties in listed buildings and/or conservation areas;
- gaining agreement on improvement for communal areas; and
- lack of access to independent and reliable information.

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

During the consultation on the City Housing Strategy, owners suggested that the best way to encourage investment (for repairs and maintenance) is through early information and advice. Some other options identified included the continued use of enforcement powers, the use of owners' associations, a Tenant Management Scheme service and financial

assistance.

Clear advice which set out the potential benefits in energy cost savings and in reduced emissions would encourage owners to consider investment. For some more major installations it may be worth having demonstration homes where interested owners and landlords could speak to owners who have energy efficiency measures installed. These example homes would need to represent typical homes e.g. a tenement flat and ex-Council homes, and not a specifically designed house. This approach has worked well in Edinburgh to help people to consider the use of telecare to enable people to remain independent in their own homes. This information would also help people to take into account energy efficiency when choosing a home, much as they often do currently for cars and household appliances.

Tailored advice which gives information specific to households would also be useful. This would allow householders to consider which energy efficiency measures would have most impact on their home and therefore to prioritise their expenditure.

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

This is covered in detail above but there is also a need to ensure that people know where to go for relevant information and advice. Although the current Energy Saving Scotland Advice Centres act as a one stop shop for relevant advice and information, these are not sufficiently well publicised.

There is a need for the Scottish Government to be clear on the range of information, advice, financial assistance and other options which will be required to deliver this step change.

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

No comment

5. (b) How should these be addressed?

No comment

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?

Local authorities should have the lead role in retrofitting Scotland's housing. In line with the guidance laid down by the Scottish Government, they should set out a strategic approach which targets priorities. These are likely to initially be those homes where major improvements can be made relatively

easily.

The consultation lays out options for the funding to local authorities to deliver retrofit schemes. These consist of either challenge fund bidding, formula based allocation or a combined Scottish pot distributed on a “first come first served” basis. It is important that local authorities develop clear strategies for their areas which show how they will maximise funding and maximise the impact on energy efficiency. These can form the basis of challenge fund bids. However, if challenge fund bidding is used, care should be taken to ensure that it minimises any additional resource requirement.

Combining the resources across Scotland would be more appropriate than a pro-rata distribution. This would allow projects to be developed on a larger scale thereby increasing potential investment and allowing economies of scale.

National promotion of schemes would help people to understand what support is available to them in relation retrofitting. There is significant potential for local authorities to work together. The Scottish Cities Alliance is exploring the potential for a joint Green Deal programme through its Sustainability Action Team - one option is that a Green deal scheme could be led by this group of Local Authorities and extended to other partners.

Community and local groups are an important part of getting information out to people, increasing understanding for the general public, and encouraging uptake. They can offer advice on how to make the best use of the scheme and the measures once installed.

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

The Scottish Government's main role should be in maximising finance through using the scope of national investment. This would include the Scottish Government acting as a broker to bring in the ECO as suggested in point (b) of paragraph 1.35 in the consultation paper to allow development of ambitious programmes.

The National Retrofit Programme should focus on complementing the Green Deal to provide financial assistance to households that do not qualify for ECO. It could also assist in situations where packages of measures do not meet the financial criteria for Green Deal.

The Universal Home Insulation Scheme and the Energy Assistance Package have proved to be successful in improving the energy efficiency of Scottish homes. The National Retrofit Programme should build on the success of these schemes by promoting the benefits of whole house solutions rather than individual measures.

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?

In order to achieve the scale of change required there is a need to create a more strategic approach to schemes. In addition, there is a need to create the scale of project which will generate significant additional investment. Collaborations and partnership will be the key to achieving improvements on the scale required.

A much more effective approach to publicity is also required. Thus far knowledge of options available is patchy and incomplete. As schemes develop they should have clear communications strategies which consider new methods of communication and the use of voluntary and community organisations.

The area-based approach in relation to the National Retrofit Programme is welcomed but the boundary needs to be flexible to achieve the maximum benefits and momentum of the programme.

Local planning services will need to have a strong involvement, in relation to district heating and installation of micro-generation and energy efficiency measures in listed buildings and conservation areas to ensure that planning restrictions do not act as a barrier to improving energy efficiency.

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 key messages need to have wide coverage through a diverse communication strategy. This could include face to face contacts at community events, local and national media, and social media networks. It is also important to have a cross-sector approach where information on the National Retrofit Programme is available in non-traditional settings, for example, through health visitors, district nurses, carers and at schools. People may also require support through the sign up and installation period.

Communication and publicity should include information on the success of current and earlier schemes so that people can buy into the vision of the Scottish Government.

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?

A minimum standard for housing of all tenures should be developed. This should be enforced through consumer choice and a private housing charter rather than legal means. Legal enforcement would require considerable resources from local authorities and these resources are not available. In addition, existing enforcement options are generally cumbersome, unpopular and have limited effect.

The focus should instead be on providing house buyers/renters with information so that they can make informed decisions. The standard could be incorporated into the Home Report along with information on heating costs and actions which could be taken to improve energy efficiency. Incentives could be developed where appropriate, with discounts or penalties through Stamp Duty.

The standard could also be incorporated into a charter for private rented housing similar to new Scottish Social Housing Charter. This would set out what private tenants and other customers should expect from private landlords in terms of standards of service. Clear information on energy efficiency should be available at the point of sale or rent which would encourage landlords and owners to maintain their homes to a higher level. The standard could initially be used in areas where local authorities or the Government have some control – for example in houses in multiple occupation and private sector leasing schemes before expanding it further.

Home Report data is currently centrally recorded but local authorities do not have access to this. This data could be used by local authorities to inform the development of local housing strategies.

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 hierarchy outlined broadly contains the key issues in the right order. However, there is a need to spell out in much more detail what each item means. The checklist should explicitly mention some key elements of home maintenance, such as carrying out an annual roof inspection.

Consideration should be given to how this checklist is publicised. If it is to be a widely available guide for homeowners it should have more detail, for example, what might an owner need to do to make sure a home stays wind and water tight, what kind of retrofitting would be appropriate to different kinds of homes, what ventilation might be required.

The list also needs to avoid jargon – for example phrases such as “retrofitting” and “micro- renewable technology” will not be familiar to many people.

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

Although improvements are important, the most vital issue is that properties are kept wind and watertight and structurally sound. The order set out by the Government in the hierarchy of looking after a home reinforces this. Although legislation and requirements for repairs and maintenance are already in place, many owners are still not fulfilling their responsibilities. There is a need to ensure that the majority of owners are meeting these responsibilities first before seeking to improve homes.

However, it is important that owners are well advised of, and encouraged to use, the opportunities to make improvements while repairing a home. For example, putting in loft insulation when the roof is being repaired.

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

The consultation on the City Housing Strategy found that one of the biggest barriers to carrying out communal repairs is to gain agreement of all other residents/owners.

However, the experience of enforcement in Edinburgh is that it is not always effective and that it is not popular with owners. It results in a difficult and unpopular process for the local authority with limited impact. There is a need to ensure instead that owners take responsibility for repairs to their homes. This should be done through Scottish Government involvement in advice, incentives and the development of a charter for private housing rather than through local authority enforcement.

Any enforcement should be focused on helping fellow owners to recover costs rather than putting the burden on local authorities to meet the costs.

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

We have no experience of work notices having relied on the discredited statutory notice process. While the council is looking at service redesign any form of notice system would require significant resources.

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

Best practices should be shared between local authorities. Once a common approach is agreed and adopted by all local authorities, an audit could be carried out to monitor the percentage of properties that have a maintenance plan and where the plan has been adhered to.

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

Existing powers are not popular and produce mixed results. There would be little benefit in introducing further powers. The focus should be on proper advice and incentives to encourage owners to take responsibility for their own properties.

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

Existing powers are not popular and produce mixed results. There would be little benefit in introducing further powers. The focus should be on providing an energy efficiency rating which homes should be expected to meet. This should be encouraged through a charter for private housing, proper advice and incentives to encourage owners to take responsibility for their own properties.

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



The Government should consider changing the restriction that some builders put on new build properties. Some builders may appoint a factor of their own choosing and then tie the new owners through their title deeds to use the factor for a set period “after the last property is sold”. This means that even if the new owners are not satisfied with the services provided by the factor, they cannot dismiss the factor under the current legislation. However the new Property Factors (Scotland) Act 2011, which will come into force on 1 October 2012 may help to resolve this situation.

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

Further information should be included in the home report to allow prospective owners and tenants to consider the impact of different levels of energy efficiency. A charter for private housing which included energy efficiency would also raise the level of awareness. Work could also be done on advertising campaigns clearly linking energy efficiency to saving money. The focus should be on ensuring that owners and renters make positive choices to develop or purchase well maintained and energy efficient homes.

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

Ensuring home owners are adequately repairing and maintaining their properties should be the priority. Introducing energy efficiency standards as part of a cross tenure quality standard should be considered. These can then be enforced where possible (in the public sector and new build) and encouraged in existing private sector homes through consumer choice based on information in EPCs, Home Reports and other awareness raising.

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

A comparison of the energy costs and carbon emissions with or without the recommendations stated in the EPC may help to encourage more people to improve the energy efficiency of their homes.

This should include benchmark information on energy use of homes of similar size and building type. This may encourage prospective tenants and purchasers to weigh up overall costs of housing not just the purchase/rental cost. In turn this may create a greater incentive to increase the energy efficiency of homes.

The EPC should include information on tenure, so that it is easier to compare the energy efficiency of similar homes of different tenures.

Data from EPCs should be shared more widely, if possible. This would

allow energy advisors, such as Energy Saving Scotland Advice Centres to be more proactive and provide tailored advice to individual households.

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

The focus of work needs to be on advice and incentives. This will help consumers to make a positive choice to purchase or rent better maintained and more efficient homes. This will be much more effective than enforcement actions.

Additional enforcement action should not be introduced.

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

The proposed regulations in England and Wales (where owners of properties with an EPC rating of F or G will not be allowed to rent them out) could encourage owners and landlords to improve energy efficiency. Similarly, energy efficiency incentives related to the new devolved Scottish land and property transaction tax could also act as an incentive.

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?

The standard should be based on outcomes and therefore should be that the property meets a certain energy efficiency level, rather than requiring particular works to be carried out. This is important in relation to traditional tenemental properties and other house types where some measures (such as cavity wall insulation) are not feasible. The standard should allow for different approaches for difficult to treat properties.

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

There should be an attempt to apply the same standards across all tenures.

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

In principle, homes of similar types and sizes should have the same minimum standard. However, as previously stated, it is much more difficult to enforce a minimum standard in the private sector. The best approach is to give information to owners/tenants so that the market begins to enforce

the standard. This information should include a charter for expected standards in housing, benchmarking information for similar properties, indications of work which could be done and the impact it would have. This should also include information on whether the home meets the standard or not. As outlined earlier, stamp duty incentives would help enforce the standard.

Any standard also needs to take account of homes where it will be impossible or very costly to meet the level required. This will be a particular challenge in Edinburgh where much of the stock is older and flatted. Information needs to be clearly given about these limitations.

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?

Older home owners often stay in less energy efficient homes. They are also less likely to move and may have limited free capital to pay for improvements. Older home owners are most likely to experience fuel poverty. Specific advice and support should be targeted at this group. This should also be linked to helping them to consider their housing need and options such as adaptations, telecare and downsizing.

Those with specific needs should be identified as part of projects and local authorities should identify whether this might require extra support for the household, different forms of communication or different approaches to deal with religious or cultural requirements.

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

Yes  No

Trigger points at sale or rental could adversely affect the housing market. It would be more appropriate to develop a sound information system and possibly incentives for owners. These will affect owners and landlords decisions on maintenance and improvement even when they do not intend to sell immediately.

In line with the Housing (Scotland) Act 2006, the focus should be on providing advice and assistance to homeowners to improve their homes, rather than enforcement. All opportunities should be used to give householders the best advice and support to encourage them to improve energy efficiency.

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

Any regulation should be rolled out on a phased approach. This would allow owners and landlords time to prepare for regulation. It would also allow industries that provide and install the energy efficiency measures time to build up the capacity. Lessons can also be learned as the regulation is rolled out.

If the national retrofit programme is likely to be area based, with the fuel poor areas being the priority, the regulations should be rolled out in line with the national retrofit programme.

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

Local authorities have minimal resources to enforce regulation. As a result enforcement should be left to consumer choice based on access to the right information. Any enforcement by local authorities needs to be self financing through charging an additional fee for any involvement.

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

Incentives and assistance, rather than sanctions, should be used to improve the energy efficiency of homes. Consumer choice will then help the market adjust. If the majority of homes are of good energy efficiency, less efficient homes would become less desirable amongst buyers/tenants and would achieve a lower selling price/rent over time.

The use of sanctions is likely to create more barriers in an already difficult housing market. It would be particularly onerous in the private rented sector where turnover is higher. This might prevent the growth of the private rented sector to meet housing needs.

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?

If the majority of the enforcement is delivered through consumer choice there is no need to delay. However, if there is a enforcement system delivered through local authorities which penalises owners this should be

implemented over a number of years. This would allow owners the time to implement energy efficiency measures as their resources allow.

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?

As outlined earlier, access to good quality comparative data when purchasing or renting a property is likely to have the biggest impact.

Homes that achieved good energy efficiency ratios (for example, EPC rating of A or B) could receive an incentive through the replacement for stamp duty after this is devolved. This would encourage those purchasing or selling property to consider improvements.

Consideration could be given to developing a guarantee system, whereby owners are guaranteed to benefit financially from improvements.

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?

Surveying practice should be modified to ensure that home reports and other surveys have clear information on energy efficiency measures which have been taken and comparative energy efficiency. Mortgage lenders should take account of reduced expenditure as a result of these measures in calculating mortgage affordability.

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 other main challenge not included here will be the potential that energy efficiency measures have a minimal impact on property value because of the economic situation. Some owners may already be in a situation where homes are worth less than the purchase value. This may discourage owners from investing in energy efficiency measures.

A further major issue in Edinburgh is the impact of Conservation Areas and Listed Buildings. This severely restricts improvements that can be made.

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?

Proving financial viability of sustainable homes for both developers and housebuyers is key to encouraging market transformation.

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

The sustainability of neighbourhoods needs to take account of good quality homes, the right infrastructure and the right facilities. These should all be designed to maximise energy efficiency. However, sustainability is about more than buildings. The involvement of the community in delivering services and maintaining the area are key to long term sustainability. Steps to ensure the design and development of sustainable communities include:

- Establishing best practice across the industry on solutions that have been effectively tried, tested and monitored;
- Involvement of potential residents in the design solutions so that they will work for the people who live there;
- Consider what is really meant by sustainable transport in terms of car parking provision and transport links; and
- Measurement, monitoring and evaluation of the success of new neighbourhoods, including design, social integration, employment and health and well being.

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 transformation must take account of the need to support the development of new build. In many areas private development has dropped to a very low level while demand remains high. For example, in Edinburgh there is demand for 36,000 homes over the next ten years. While affordable housing completions are at record levels, private sector completions have dropped from 1457 in 2006/7 to 486 in 2010/11.

Developers are likely to improve sustainability where it is cost effective and where they can see a positive impact on sales. Purchasers are more likely to consider sustainability if they have clear information which shows the benefits it will give both to their household and to the environment.

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

The benefits of successful schemes should be well promoted. This should include evidence that the scheme works for residents and developers. It should also show that there are no impacts on fire safety and structural integrity.

Changes to planning requirements may be needed for some innovative development methods.

Consideration also needs to be given to the requirement for building insurance. This generally involves the need to prove durability and track records from the contractors/ builders guarantees. This will be more difficult with innovative construction.

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?

Having a longer budget commitment/resource planning assumptions period, say over 3 to 5 years, could help affordable housing developers to plan for and commit to developments that generate efficiencies in procurement in order to fund greener construction methods and technologies.

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 best way to encourage the construction industry to use innovative methods will be to show that it will increase sales and/or not cost additional money. If there are higher costs, construction companies are likely to be resistant in the current market.

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?

There is a need to ensure that national and local training and employability strategies are geared up to meet the prospective demand from these changes. It is also important that the work creates long term job opportunities not just short term training.

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



Investment in skills and training should be linked to existing employability and economic development strategies in order to ensure a co-ordinated approach.

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?

Edinburgh's Economic Development Strategy recognises the potential for new businesses, jobs and skills in an emerging low carbon economy. This will be developed further through the actions in the Strategic Environmental Action Plan, which sets out how Edinburgh will tackle issues around energy at the city level. New businesses, jobs and skills in the sustainable energy sector will be supported through the Business Gateway.

A lot of work has been done by the Council to instigate cross-partner action through the Edinburgh Guarantee. The scheme works with the public, private, and voluntary sectors across Edinburgh to increase the number of jobs, education, or training opportunities available to young people, in tandem with work to improve the level of support available to help them move into a positive destination.

This kind of partnership working is an effective way to engage with and support the construction industry and other industries/services crucial to the development of the sustainable energy sector.

There is a role for the Scottish Government, as well as local authorities and local employment partnerships, to lead on dialogue with industry representative bodies such as National Skills Academy for Construction and Federations of Builders about industry needs in terms of future skills gaps, replacement skills and shortages due to 'greening' of the industry. As acknowledged in the consultation paper, the construction industry also has to feel confident that any investment they make in training will be worthwhile and the industry may be reluctant to invest until they see that Green Deal, for example, is working in practice.

Community benefit clauses can be used in construction contracts to help support skills and training development opportunities. The forthcoming Scottish Government consultation on sustainable procurement might encourage further debate on the current and future needs of the construction industry and how the procurement process can support this.

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

Any skills and training opportunities should be open to all but there may be opportunities to gain wider social benefits through helping unemployed and vulnerable people to take advantage of skills and training initiatives. This can best be done in a co-ordinated way through initiatives led by local



authorities and their partners, such as those described in Q45 above.

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?

Training and skills programmes for this type of work need to be designed specifically to be attractive to women and other groups who are traditionally under-represented in these industries. This should include options for flexible working where appropriate. Positive promotion of the industry needs to be introduced to children from an early age and promoted to job seekers.

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.

None