

**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 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...Network</b>	<input checked="" 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 Healthy Environment Network welcomes the opportunity to comment on Scotland's Sustainable Housing Strategy. The network agrees with the broad vision and objectives of this strategy, in particular linking energy efficient homes, fuel poverty, climate change, refurbishment and house-building and Scotland's low carbon economy. These factors are recognised as important factors when considering Scotland's Sustainable Housing Strategy.

Housing should be recognised as a key element of neighbourhoods and communities which live in them.

Housing has a positive impact on Health.

The strategy provides a short term response to the issues of climate change, which the network recognises as important for the environment and human health, but does not really consider Scotland's longer term reliance on fossil fuels. The strategy does not mention any action to address increasing pressures on these resources nor a move to alternative sources, which are fundamental aspects of climate change and sustainability.

A focus only on improving insulation may reduce ventilation levels in housing to a degree which could reduce the quality of indoor air, which affects the environment in the home and could then affect health.

The strategy also appears to have a focus of making sustainable housing more expensive, which could lead to a widening of inequalities in the population.

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

Research undertaken suggests that the main barriers that prevent home owners and landlords from installing energy efficient measures is the cost of installing the measures and not feeling it is their responsibility. The cost is a particular concern for those on a low income.

The research also suggested that home owners and landlords did not know enough about what is appropriate for their home and the impact of these measures on energy efficiency in the short and longer term. The impact could also include the negative aspects, if there are any, of installing these measures on people's indoor environment and ultimately health.

Home owners and landlords do not trust the people selling these

improvements and/or trust the people installing these improvements to do a good job.

Other barriers are the inconvenience of installing the measures and who would be available to install the energy efficiency measures.

Research from Consumer Focus Scotland also found that the barriers included the complexities of funding sources, complexity of the advice and assistance packages and concerns about cavity wall insulation.

Additional barriers would include literacy and language barriers for those for whom English is not their first language and accessibility for the visually impaired.

The strategy approach should start with the needs of the communities themselves rather than trying to sell the approach to people.

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

The most effective actions should be targeted at structural issues.

One of the most effective ways of addressing barriers would be to remove the complex and difficult to navigate system which has emerged and give responsibility and funding to one agency, for example local authority, to ensure that all housing in their areas is appropriately insulated by an agreed date. This agency could prioritise in terms of need and operate a system where householders need to “opt out” rather than “opt in” to the upgrade of their housing. They may also be considered as trusted agents, and reduces the concerns of the population about employing disreputable builders. The upgrades could be free at the point of service and early phases would be prioritised to those most at risk of living or moving into fuel poverty.

Local authorities have a strategic role in improving housing in their area and having an understanding of housing quality standards ensures they are well placed in identifying local needs. Local authorities can build on existing relationships and services already provided to consumers.

Other solutions would include ensuring that clear and concise information is available locally from trusted sources in a range of languages and formats (including non-written).

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

See the response to Q3.

Also there is a need to identify cost effective improvements for traditional housing that are recognised as being ‘hard to treat’ buildings e.g. solid wall construction.

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

One of the issues is encouraging contractors/businesses to travel (particularly to Island communities) to undertake this type of work. If you can encourage them into rural areas they are likely to charge more for their services because of travel costs and this increases the costs for the consumer. This needs to be addressed.

There are a high percentage of rural properties with either solid wall or other types of hard to treat wall construction and incentives will have to be provided to enable efficiency measures to be adopted.

5. (b) How should these be addressed?

There is a need to take account of existing barriers for rural housing stock in identifying appropriate energy efficiency measures and ensuring these households are not disadvantaged in any way.

Centralising the service and moving to an “opt out” approach would increase the scale of work requiring to be done which might then make such contracts more attractive to contractors. If the agreed agency could train local residents and companies to undertake the work then the costs for the consumer are likely to be reduced and at the same time would provide local employment opportunities.

More extensive inclusion of issues such as micro-generation, the use of biofuels, community windfarms and community heating systems all of which may be more effective and appropriate in a rural setting.

There is learning from the transition movement  
<http://www.transitionnetwork.org>

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?

See comments to Q3-5 above

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

The Scottish Government will require to identify appropriate funding to support the delivery of this strategy and identify appropriate measures/outcomes to measure levels of compliance. Implementing structures/processes for quality assurance would be an important role for Scottish Government.

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

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

Simplifying the system by making it “opt out” rather than “opt in” and providing funding.

If continuing with the consumer model then national coordination and promotion of available services would assist in general awareness raising. Local coordination, signposting and assistance to vulnerable groups, e.g. the elderly, to help navigate the processes of determining what works are required, securing and coordinating the works and assisting with reinstatement and aftercare when the work is complete is also important.

Restoring homes to a pre-intervention state is very important especially for the low income vulnerable elderly population and concerns about the quality and professionalism of contractors can act as a significant disincentive.

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 importance of living in warm and well maintained homes is acknowledged e.g. in the Scottish Government’s Health and Social Care Bill, and the Good Places Better Health recommendations.

Move from a consumer model to one in which people would have to “opt out”. If the chosen agent is the local authority then they can build on existing relationships and services already provided to consumers, in particular addressing the needs of vulnerable groups.

If continue with the consumer model, it would be important to target information in an accessible format (e.g. language, non written resources etc) to these groups, and in some cases use a variety of trusted sources for information.

More effort is needed between local authorities and NHS Boards to help identify vulnerable individuals with chronic health problems. There is insufficient emphasis on using energy efficiency measures as a means of reducing the adverse effects of low temperature on the elderly and chronically ill.

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 mandatory condition standard should co-exist alongside an energy performance standard (much as the SHQS exists alongside the tolerable standard). An absolute minimum condition standard should apply immediately to all properties, while the minimum energy efficiency standard would apply at point of sale or rental, gradually upgrading properties. The minimum condition standard is not a replacement for minimum energy performance standards, but works alongside and supports them.

As stated above a single mandatory standard, irrespective of tenure, would be the most desirable, but this may be difficult to enforce.

A default mechanism (e.g. for works being undertaken in the event of non compliance) must be determined, as existing mechanisms such as doing works in default and/or placing a charging order against a property have a cost implication for the enforcing authority (usually the local authority). This may sometimes deter local authorities from taking enforcement action; particularly if they do not have the money to do the works in default.

There may be difficulties faced by owners, particularly for those on low incomes, and for repairs that may be cost prohibitive.

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 network agrees with the hierarchy of needs, but it is not clear the purpose of the checklist and who the list is for because it will not mean much to homeowners or landlords. The language is not appropriate, for example number two on the list states “make sure that work is done properly” – what does this mean? Number four on the list states “make sure that your home is properly ventilated because this is essential to keep it healthy” – keep what healthy the home or yourself or both. What does micro-renewable technology mean? It is likely that a housing professional will make sense of the hierarchy of needs, but not home owners or landlords.

A reference to draught proofing for windows and doors should be added.

How will the list be made available to home owners or landlords?

Good housing condition is often a precursor to good energy performance and supports the intention to encourage owners to give higher priority to maintenance and repairs, and to use the opportunity of cosmetic

improvements to carry out energy efficiency works.

However, we do not believe the government is making full use of the tools at its disposal to encourage this behaviour. We believe a mixture of advice, incentives and regulation can help guide this change of culture.

If continuing with the consumer model rather than moving to the “opt out” model discussed in question 3 then householders would benefit from receiving independent advice in relation to works necessary to meet an agreed minimum standard. Financial support for works considered of a priority nature would assist low income households in preventing further deterioration and undertaking retrofit energy efficiency at the same time, if appropriate.

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

Yes local authorities should be able to require that owners improve their properties, but in practice this will only have impact if resources are directed to make this happen. This power would be useful in co-ordinating work in blocks (both mixed tenure and multiple owners).

At present, the action of a minority of owners who do not or cannot pay for communal improvements can prevent other owners from improving their property. This clearly creates a barrier to installation of energy efficiency measures.

The approach may vary depending on the level of upgrade planned. If it is to meet a basic minimum standard then it would be reasonable to require the owner to pay for the improvement. If it is a major upgrade, we believe another agency such as local authorities should have the power to enforce decisions as outlined in question 14.

Need to audit properties in local area to investigate properties which require improvements to their homes in particular energy efficiency measures and then to provide services to ensure that work is done – moving to an “opt out” system would help this process.

Local authorities having served repair notices may require to undertake works in default/recover costs. This may create a barrier in deterring local authorities in taking enforcement action because such action places a burden on already scarce financial resources. There is a need to ensure local authorities are adequately resourced in taking forward energy initiatives.

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

As stated above, local authorities require to be adequately resourced in fulfilling additional responsibilities. Providing local authorities with additional powers will greatly assist in circumstances where householders are not willing to contribute to the costs of carrying out communal repairs.

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

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

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

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

This should happen particularly where a commercial property adjoins a residential property and the disrepair/poor energy efficiency of the commercial property detrimentally affects the condition and amenity of the residence.

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

Homeowners should be able to benefit from commercial competition when assessing service provision and associated costs.  
Options 3 and 4 provide greatest flexibility.

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

Attempts have been made to encourage owners and tenants to make their properties energy efficient by saying that they are damaging the environment by not making them energy efficient.

Also that people could save money in the longer term if they made their homes more energy efficient. People are confused because there are so many messages about climate change and carbon emissions and some of them are conflicting.

The Scottish Government could be clearer on carbon emissions and climate change and energy efficient homes and lead by example.

Is providing information enough to encourage a change in behaviour?

The current housing market does not give enough value to the energy performance of a house. For example, the requirement for all adverts for properties marketed for sale or rent must display the EPC rating and raising awareness with estate agents and surveyors of the value of household renewables. However, while these measures are valuable they must be taken alongside the forewarning of regulation if they are to be taken seriously by the market. The government must send a clear signal that regulation will be introduced at a certain date and then provide advice, support, and incentives to help owner-occupiers and landlords meet the requirements.

Alongside regulation, we strongly recommend the following awareness-raising measures:

- Regular and consistent demonstrations of good practice across the public sector estate
- Provide advice support and information to change behaviour
- Awareness - raising of the EPC and how much the property can be expected to consume (as with white goods) and provide CO<sub>2</sub> emissions compared to potential running cost (as with vehicles gCO<sub>2</sub>/km count)
- Normalising energy efficiency improvement through the media as with smoking ban and seatbelts campaigns.

Also there is need to consider the total costs of new houses, including running costs over their lifetimes, rather than looking only at the up-front costs at the point of sale. It would therefore be helpful to describe running

cost savings in financial, as well as environmental terms.

The Scottish Government could introduce a carbon rationing process whereby individuals are allocated a personal allowance of carbon.

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

Yes. If the government forewarns about the regulation, and sufficient financial support and advice is provided through the National Retrofit Programme, private owner-occupiers and landlords should be able to meet the requirements of the standards with little difficulty or financial burden.

We support the intention to introduce the Energy Efficiency Standard for Social Housing by 2020 which recognises the need to escalate the energy efficiency standard of SHQS to take account of fuel poverty and climate change concerns. We believe it will make it much easier for social housing landlords to meet this standard if private housing also has to meet an energy efficiency standard – thereby creating a level playing field.

In advance of regulation being introduced, voluntary measures should be actively promoted, while making it clear that regulation is forthcoming.

Some houses are classed as 'hard to treat', i.e. solid wall dwellings, and may require to be dealt with in a different manner.

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

The network welcomes the measures outlined to improve both the information presented in EPCs, and their use. As noted above (q 20), we consider that the provision of clear and integrated information on energy efficiency, likely energy bills, and costs of any suitable improvements is critical for consumers, whether buying or renting a house.

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

Actions should be sufficient to meet the long term required outcomes in terms of fuel poverty, climate change, sustainability and healthy housing (warm, dry and mould free). The effect on vulnerable groups and in particular ensuring sufficient support is provided in implementing the required changes.

There is the need for both the production and promotion of information, ideally including case studies, describing existing poor housing, and what has been done at what cost to improve it.

Ahead of the change of standards a major promotion and education campaign should be initiated targeting the conveyancing industry and private landlords and letting agents. This should promote the timelines for compliance and support and incentives.

Ahead of the regulation being in place all renters and purchasers of property should know what standard their property meets and if it complies with the forthcoming regulation.

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

The introduction of regulations will in itself send a signal that more value should be placed on energy efficiency, and that, in turn, will help encourage take up of incentives.

Regulation needs to set appropriate standards while allowing sufficient lead in time to progress toward compliance.

Providing a range of worked examples that accompanies regulations will assist owners in allocating resources to most effect.

Information and incentives require to be easy to access and in particular to vulnerable groups, e.g. older people, and sufficient support provided to identify sources of funding for carrying out the required changes.

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 network would suggest that option 3 appears to come closest to the desired outcomes. We would also suggest inclusion of consideration of ventilation levels, cost to heat, and dampness and mould levels.

As discussed previously any proposed measure would also require to address standards of repair, as energy efficiency measures would be ineffective otherwise. There is merit in ensuring the standard provides an appropriate measure and offers a baseline going forward.

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

Yes, but we have some concerns. It could be confusing for the diverse private housing sector and simplicity and ability to deliver will be critical to the success of any proposed regulation. It is not clear if the proposed standard is sufficiently challenging to meet the statutory climate change target and fuel poverty targets. Consumers, particularly in the rented sector, should have the right to expect homes they rent to be affordable in terms of heating.

There is an issue about equity with a differentiated standard depending on housing type and location.

Cognisance will also need to be taken with respect to 'hard to treat' houses and where there is potential logistical difficulties in converting properties away from oil, liquid petroleum gas or solid fuel sources to meet energy efficiency levels, particularly in relation to rural/isolated premises.

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

This is particularly appropriate for properties that impinge on one another e.g. attached properties, properties in a block.

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?

"Opt out" rather than "opt in" processes, information in appropriate formats and systematic assessment of need.

There remains a need for targeted energy efficiency support (as is currently provided by EAP) for vulnerable consumers.

Engagement with vulnerable or disadvantaged groups often requires bespoke approaches, and that information is best delivered by intermediary organisations trusted by different groups.

The way regulations are designed and applied needs to take account of the circumstances which might face vulnerable consumers. For example, it would not be appropriate to make an elderly person carry out significant, expensive or disruptive works as a condition of selling their house prior to moving to retirement accommodation. An approach which is flexible enough to permit either the seller or buyer to carry out improvements would be more appropriate.

There may be a case for exemption from some measures e.g. replacement of heating system or controls where householder suffers memory loss or confusion. Close working with social care staff, hospital discharge response teams, and carers needs to be built in.

Additional support may be necessary such as providing alternative housing/financial support in circumstances where proposed works are of a more intrusive nature and the property fails to provide a safe warm environment during this period. Timing of regulation is important – at point of sale or change of lease where this is more appropriate to the resident of the house.

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

Yes  No

Housing turn over is very slow so would require additional trigger points to point of sale or rental. There could be a phased rolling programme of audit followed by supported action. Target areas could be prioritised following analysis of national surveys.

Other situations that could be included are where properties are undergoing major structural repairs or refurbishment either instigated by the owner or local authority, or where general repairs notices are served by local authorities.

However, many improvements (new kitchens or bathrooms, re-roofing work) do not require local authority permission or involvement, so it would be necessary to consider how best to promote actions alongside that work.

Financial support should be available to act as an incentive to undertake energy efficiency works and the cost implications to local authorities of serving notices would require to be considered and proportionate.

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

All at once, with sufficient lead in time to allow phased retrofit. It is more appropriate to progress on a phased roll-out to enable the opportunity to provide worked up examples appropriate for the different housing types in particular in developing cost effective solutions to address 'hard to treat' properties.

Regulation should be focused on the least energy efficient properties initially.

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

As discussed previously, the position of tackling houses in default of notices resulting in local authorities having to pay or to place charging orders must be considered as there is a financial implication for local authorities in taking action.

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

The obligation to carry out energy efficiency improvements should be transferable from a seller to a new owner for a set period of time – say 12 months.

In the PRS, the sanction on a landlord should be that they cannot rent out a house which does not meet the required standards. This could be done through a revised Landlord Registration Scheme. We appreciate that this is likely to require an extension of the role of local authorities, and that resources will be required to enforce this.

In addition, an incentive could be introduced within the Land and Buildings Tax replacing stamp duty in 2015 so that homes that comply with the Standard are taxed at a lower level than those that do not. Part of the tax could be reclaimed by the buyer if they achieve the Standard within year 1 of ownership.

Sanctions should only be used as a last resort. There should be cognisance taken of low income households who may not be in a position to afford to carry out these measures. Similarly where there are changes in life circumstances requiring the sale of homes, i.e. bereavement, divorce, physical disability, there is a need to ensure sufficient support is available to identify sources of funding to carry out required changes.

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?

This would depend on the timing of the outcome they wish to achieve. The time taken to achieve the Scottish Housing Quality Standard by the social rented sector would give an indication of how much time the considerably more diverse private sector would require. There is a merit in placing information in the public domain in advance of 2015 to communicate standards and sanctions for non compliance. It is also appropriate that details of funding streams are communicated at an early stage to encourage take up of incentives.

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?

Property values do not reflect energy efficiency and therefore running costs of the home. The network agrees that we need to shift cultural attitudes to energy use such that people value energy efficiency.

The consultation presents a range of measures which are useful, but the network also suggests the following additional measures:

- Better presentation of information at point of purchase/rental: as well as the compulsory use of EPC data at the point of advertising, it should also include the running costs.
- Apply a council tax discount to all properties that have achieved a significant energy level
- Use the Land and Buildings Tax replacing stamp duty to incentivise energy efficient homes.
- Review legislation relating to the Clean Air Act and urban biomass to allow for approved appliances for district heating to multiple homes
- Expand the EST Green Homes network to include many more energy upgrades of existing homes
- Showcase energy efficiency upgrades of public buildings

We would argue that if we go back to the premise that a local agency takes responsibility for providing this work, this question becomes irrelevant.

One main concern the network has is that if sustainable, energy efficient housing attracts a premium either onto rental or house prices this will widen inequalities by making such housing less accessible to those who are unable to afford the premium.

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?

These changes will take place over time as practice reflects rising energy costs and any regulatory framework. Once the principle is established, it is likely that training and Continuing Professional Development will help address the current lack of understanding of energy costs and income, but demand for this knowledge will only come once the market is established.

We suggest training should include:

- Training to surveyors to take account of renewable technologies present and assess the income and savings from these
- Training to lenders to take account of additional income and savings resulting from renewables when assessing for a mortgage.

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?

There may be increased maintenance costs associated with new technologies and may act as a barrier. Engaging with householder values; exploring other motivations to behaviour change that make people feel good about themselves and their actions (rather than just saving money). Giving greater priority to following up with householders after retrofit to make sure they are benefitting from the changes and know how to use the technology. Continued discussion with stakeholders, especially property professionals, on the Green Deal.

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

Practical information as to where energy efficiency/building modifications may make a direct and tangible difference to consumers (e.g. green landscaping helping to reduce flood risk; energy efficiency helping to reduce fuel bills etc.).

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

Sustainability principles will require to be embedded into government policies to influence the decision making process at both a national and local level. The importance of promoting energy efficiency throughout all buildings over which SG has influence, not just housing.

It would send the wrong message to householders if the Scottish Government stepped back from the recommendations in the Sullivan Report on new build standards. Strong and ambitious building standards will drive innovation, quality, and a reputation for low carbon buildings.

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

Sustainable neighbourhoods should also be healthy neighbourhoods in terms of community and individual health and wellbeing. Also sustainable neighbourhoods should be what the communities want and need and they should be really involved in the design of their sustainable neighbourhoods from the beginning of the design phase. This is alluded to in the Scottish Government's Designing Places policy, but sometimes is overlooked.

Sustainability principles will require to be embedded into government policies to influence the decision making process at both a national and local level. This approach is essential in creating sustainable neighbourhoods, particularly supporting local actions that may be contentious.

The location of new housing, the design of new neighbourhoods and access to services like shops and schools should all be designed to minimise the amount of car traffic generated by new developments.

Sustainability criteria for new developments must also take into consideration the potential effects of climate change, and incorporate mitigation and adaptation measures such as the use of SUDS and reducing hard landscaping.

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?

Need to revise and improve building standards to ensure that new housing meets high requirements in order to ensure the kind of reductions in carbon use required for the agreed outcomes.

As stated previously, there may be maintenance costs associated with new technologies which may affect uptake.

There is merit in exploring ways to make energy efficiency housing more attractive from both a lending and buying perspective.

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

High standards should be set and make these a requirement to ensure that housing built now will be future proofed and of sufficiently high standard to meet the desired outcomes. The desired outcomes should be that all homes should be sustainable and energy efficient and should be the norm and not the exception.

Funding projects aimed at mainstreaming innovating methods of construction may encourage uptake.

There maybe a need to create a skilled workforce to support specific training initiatives.

Adopting industry good practice and innovation awards across the house building sector.

Allowing the planning approvals process to take cognisance of and allow for innovative methods.

Making mortgages for energy efficient properties more attractive.

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?

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

There is merit in exploring ways to make energy efficient housing more attractive from both a lending and buying perspective. An increase in demand will then lead to more competition to supply energy efficient housing within the house building sector.

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?

Specific training initiatives will be required to create a skilled workforce.

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?

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

There is an opportunity to build on the current service provision available from a number of different providers both in the public and private sectors. There may be opportunities to encourage applicants from areas of high deprivation or those disengaged from the labour market (e.g. considering giving financial incentives to employers who recruit workers from areas of high deprivation). Consider the potential for increasing vocational qualifications in schools and linking to apprenticeships.

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

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.