



Existing Homes Alliance Scotland

Homes that Don't Cost the Earth

A consultation on Scotland's Sustainable Housing Strategy

Consultation Response

28 September 2012

Introduction

The Existing Homes Alliance Scotland is a coalition of anti-poverty, consumer, building industry, environmental, energy advice and social housing groups which is calling for urgent action to transform the existing housing stock and make it fit for the 21st century. The vision set out in the Sustainable Housing Strategy aligns with our own view for existing housing – “warm, high quality, affordable, low carbon homes.”

The Alliance set out 10 recommendations for taking forward this agenda, and we are pleased to see several of these addressed in the consultation. The recommendations are listed below:

1. A Scottish Retrofit Strategy for Existing Homes, as part of an overall strategy for housing, aiming to achieve at least 42% carbon emissions reduction by 2020.
2. A timetable for the introduction of new regulation and planning controls, backed by market incentives, to improve the energy performance of existing homes.
3. Scotland-wide area-based schemes for retrofitting existing homes alongside a national, demand-led, programme.
4. A range of financial incentives to encourage investment in energy efficiency and micro-generation.
5. New service offerings, products and packages for retrofit.
6. Better information for consumers on household energy use and its carbon emissions.
7. Better energy performance data on existing housing.
8. Reliable quality control and up-skilling on low and zero-carbon technologies.
9. A major programme to catalogue and showcase existing and ongoing exemplar low energy refurbishments.
10. UK energy and tax policy provide incentives to cut emissions.

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The Alliance believes the strategy contains many of the elements needed to address our recommendations, though the actual content and resourcing of the strategy will tell if the vision can be achieved.

We are particularly pleased to see the commitment to a National Retrofit Programme and the inclusion of the Role of Standards in the consultation, though we would have preferred to see a more definitive commitment to introducing standards by 2015.

The Alliance is a member of the Sustainable Housing Strategy Ministerial Working Group and looks forward to meeting again in the coming months to discuss the analysis of the responses to this consultation and implications for the final strategy. We believe the Working Group could have a role to play in the future in providing oversight on progress on strategy objectives and outcomes.

Chapter 1: National Retrofit Programme

Q1: Are vision and objectives as set out in sections 19 and 20 appropriate?

We strongly support the vision as set out in the Introduction: “warm, high quality, affordable, low carbon homes that will help to establish a successful low carbon economy across Scotland.” We welcome, in particular, that this strategy integrates fuel poverty, climate change and economic development policies. It would be useful if the vision was clearly linked to the target date of 2030, as are the strategy objectives.

The “route map” to 2030 makes clear the four areas for focus. We agree with the four strands, but suggest the objectives could be more ambitious given the timetable to 2030. For example:

Deliver a step-change in provision of energy efficient homes to 2030 – it is estimated that in order to achieve the 2050 emissions reduction target of 80%, most homes will need to be zero carbon or A rated on the EPC scale¹. Given that other sectors of the economy such as transport and agriculture are unlikely to cut their emissions by 80% by 2050, other sectors will have to do more and buildings have the potential to do so. This means that the route map to 2030 must be set in the context of the 2050 target and this objective should provide the appropriate milestones en route. For example, should the *average* home be at a B on the EPC scale or above?

Ensure that no-one in Scotland has to live in fuel poverty, as far as practicable, by 2016: We welcome the restatement of this commitment to the statutory fuel poverty target. However, as this is a route map to 2030, the objective should also relate to how it will fuel-poverty proof homes and make sure no-one falls into fuel poverty after 2016.

Make a full contribution to the Climate Change Act targets, as set out in the Report on Proposals and Policies: We welcome the explicit commitment to carbon reduction in this strategy. The Alliance believes homes can and should make a bigger contribution to meeting the 2020 target, because other sectors are less likely to deliver big cuts due to cost, political acceptability, or timescales for change. In the case of housing, the solutions are on the shelf, and once installed, the changes are

¹ Boardman, Brenda, (2012) Achieving Zero: Delivering future-friendly buildings, University of Oxford's Environmental Change Institute

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durable. The Alliance calls for the housing sector to deliver at least a 42% cut in emissions by 2020 as opposed to the 36% set out in the RPP.

Enable the refurbishment and house-building sectors to contribute to and benefit from Scotland's low carbon economy and to drive Scotland's future economic prosperity: We agree every effort should be made to make sure the National Retrofit Programme creates and maintains jobs in our communities, not jobs shipped up from the Midlands. As this is an objective to 2030, it would be more accurate to state what kind of 'retrofit' workforce will be in place.

Specific comment to Table 1 – RPP1 milestones and progress: Section 4.3 of the RPP also refers to draught-proofing and pipe lagging. It would be useful to define what is meant by a highly efficient boiler, and what appropriate controls are. The Alliance is not convinced these milestones are sufficient to demonstrate adequate progress has been made to meet the 36% emissions reduction projection in RPP1 and suggests these should be reviewed and updated in RPP2.

Q2: What do you think are the main barriers that prevent home owners and landlords from installing energy efficiency measures?

- Insulation is a hard sell – it is out of sight and does not give any cosmetic improvement
- Cost: up front capital cost that pays back over several years. Costs and hassle of redecoration. Doubt that investment will increase value of property.
- Complex funding programmes: mixed messages from government on grant funding, stop-go programmes, only some measures are funded, lack of flexibility in criteria.
- Lack of knowledge, mistrust: suspicious about claimed energy savings; little understanding of measures such as solid wall insulation; concerns about quality of work, concerns about air tightness and damp, waiting for a better price or better technology.
- Flats/tenements – difficulties in agreeing on and co-ordinating work
- Landlords – split benefit, need to raise rents to cover cost of investment?

Despite the barriers mentioned above, it is clear that area-based insulation programmes are successful in improving take up of measures. Targeted promotion, enabling measures and knock-down prices have all had an impact. Hence, there is good evidence to support the continuation of the UHIS approach under the National Retrofit Programme to maximise voluntary take-up. However, some homeowners and landlords are still not taking up measures, even when measures are free or in some cases, they are offered a 'cash-back'.

In addition to a well-designed National Retrofit programme (we endorse the approach set out in the Consumer Focus Scotland publication, *Energising Communities*²), the Alliance suggests several of these barriers could be overcome by foreshadowing regulation of the private housing sector for minimum standards of energy performance to act as a backstop for those who won't take voluntary action, and drive demand for measures more generally.

In the case of more expensive measures such as solid wall insulation, the barriers are even more significant. According to a recent report, *Solid Wall Insulation in Scotland*,³ there is not yet

² Energising Communities, <http://www.consumerfocus.org.uk/scotland/publications/energising-communities>

³ Changeworks Solid Wall Insulation conference report, available at <http://www.changeworks.org.uk/publications.php>

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agreement on what measures are most appropriate for different property types. The report concludes, “many of the technical issues raised in this report, particularly concerning the U values of solid walls and effects of IWI on interstitial condensation, need to be addressed more fully before householders and landlords can have sufficient confidence of the appropriate solutions, savings and impacts of SWI.” The report also notes that there is a lack of installers to meet the potential demand driven by ECO, and a real lack of specialist skills to provide bespoke solutions for different house types. Both of these points do not inspire consumer confidence.

Cost is also a big issue. Solid wall insulation is a significant expenditure with a long payback period. ECO will subsidise the measure, but it is uncertain to what extent. Will ECO ‘plug the gap’ for hard to treat properties so they can meet the Golden Rule? Will there be an across the board ‘offer’ for solid wall insulation or will it vary depending on how much carbon saving your property can offer?

Disruption and the costs of decanting to another property and redecoration are further barriers. All of these uncertainties represent significant barriers to take-up, yet solid wall insulation must be part of the solution of low carbon homes.

The Alliance urges the government to conduct further research into solid wall insulation, to work with the industry to develop a quality workforce, and to use the National Retrofit Programme to generate models of good practice. Projects with social housing landlords addressing mixed tenure blocks would be a good place to start.

Q3: Please explain any practical solutions and/or incentives to overcome any barriers you have identified?

As noted above, many barriers can be overcome through market transformation – Scotland becoming a society that values energy efficient homes. This can be achieved through a combination of education, incentives *and* regulation as discussed later in this consultation. For example, a well-designed National Retrofit Programme, combined with a stamp duty and council tax rebate which rewards energy efficient properties and a minimum energy efficiency standard at point of sale and rental.

In the more immediate term, we recommend an evaluation of all Scottish Government energy efficiency programmes, particularly the area-based schemes and including CCF schemes, to learn lessons of good practice to inform the NRP. It would also be useful to draw together the lessons from the solid wall projects funded through UHIS, CCF, CESP, social housing landlords, Historic Scotland, and the trials being undertaken by the Energy Saving Trust and the insulation industry in England to set out a route forward to develop this technology and installation without delay in Scotland.

Other measures which could help overcome barriers are:

- Continue support for Energy Saving Scotland advice network
- Improve the customer journey – quick, smooth, easy
- More handholding support for landlords
- Improve value of guarantees on upgrades
- A national register of property types and improvements needs to be created and widely distributed, including the range of non-traditional properties in Scotland.
- Landlord registration scheme can be a useful way to promote energy efficiency benefits

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Q4: Given Scotland's diverse range of housing, what support is needed to enable people to get energy efficiency measures installed?

As more complicated physical measures and / or support for consumers is needed, area-based programmes which offer bespoke advice will be the most appropriate response. Thus, continued investment in the Energy Saving Scotland advice network is required, expanding advice and support to hard-to-treat and traditional homes. Provide programmes of support (face-to-face advice, case studies, technical guidelines) for hard-to-treat measures such as coombed ceilings, rooms in the loft, partial lofts, floor insulation.

**Q5: (a) What specific issues need to be addressed in respect of improving energy efficiency in rural areas, particularly more remote or island areas?
(b) How should these be addressed?**

The main concerns are distance, access and sufficient numbers to achieve economies of scale. Many homes may be easy to improve, but their location can be a barrier to cost effectiveness compared to a similar scheme in a less remote location. Business models to tackle these issues have often had to resort to subsidy in the delivery chain. Standardisation of improvements can in some cases make the need for subsidy minimal. Subsidy should be available to local businesses supporting the local economy and local residents. For example, support for small businesses, training in technical installation, customer service, etc. Lessons can be learned from HIS and UHS schemes in rural and island areas where enabling measures were used.

The challenge will be to ensure that organisations trusted by consumers in rural areas are able to access ECO effectively. Evidence from both CCF projects and from energy company experience suggests that locally based organisations with personal contacts among consumers and communities are able to do this most effectively, especially where more complex measures are needed and where personal recommendations based on experience are critical. The experience of some CCF projects (eg Sustainable Uist) also suggests that, while material costs can be higher in remote or island areas, the use of local traders can reduce costs overall, when compared to delivery of measures in more populated areas. We would therefore suggest that contract and procurement approaches, where the government has influence over these, should seek to maximise opportunities for both local organisations and small scale rural businesses. In addition, demonstration projects with some public access are also likely to be helpful here.

Our previous comments in relation to standardising the methodologies for improvement across a range of dwelling type are relevant here. Once standard systems are developed, the costs associated with provision and application of systems can be mitigated.

Q6: Taking into account the models and funding sources outlined in sections 1.20-1.37, what role might local authorities and other agencies play in bringing about a step change in retrofitting Scotland's housing?

The Alliance welcomes the approach outlined for the National Retrofit Programme. We agree it should be area-based programmes, led by local authorities and focused on fuel poverty.

Local authorities in Scotland are well-placed through their strategic role under the Local Housing Strategy (LHS) to understand the nature of housing provision across their area. Whilst the condition of this stock may not be fully known, particularly in the private sector, all households engage with the local authority in a variety of ways – be it the Council Tax, landlord registration, schools, social

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care etc. The LHS serves as the only route to drive investment in housing, however without central government support through minimum standards for the private sector and structural funding to support enforcement there is little impact that a LA can make within the much larger private sector.

Local authorities are well-placed to work with trusted local partners, community groups and other agencies which can maximise the impact of the NRP in terms of fuel poverty, climate change, jobs, and health. It would be worthwhile exploring the potential for a procurement framework which could allow for SME local installers to be selected for work.

There is a concern that not all local authorities will have the capacity to plan, develop and deliver the National Retrofit Programme. There is a role for the Scottish Government to support local authorities through data gathering, analysis and mapping as well as capacity building where necessary. For example, a transparent fuel poverty mapping exercise is needed to identify areas likely to have a higher risk of fuel poverty, so that funding for delivery can be targeted appropriately. However, we believe that mapping also needs to identify the detailed causes and likely solutions needed under local circumstances.

It may be possible for local authorities to group together to work as a regional partnership in order to make programmes more attractive for ECO investment, while at the same time providing local delivery. This could take the form of a Community Interest Company, brokering ECO investment and other potential funding.

UHS can offer some experience of how area-based schemes have worked, and lessons should be applied to the design of NRP, while recognising that this programme will move beyond simple measures of loft and cavity wall insulation to more complex and expensive measures. Local authorities should reconsider their council tax rebate schemes in light of the NRP. The current scheme has not worked as well as hoped and should be redesigned in a way that will generate demand for the NRP.

The key elements of the NRP should include:

- Area-based programme to maximise ECO, economic development, and integrate with Green Deal
- National demand-led programme for the fuel poor
- Regional ESSacs continue role of a) providing energy advice to all and b) ensuring effective scheme integration in order that householders are made aware of all sources of help and support available to them.

It is not possible to prescribe what the schemes will deliver – it will depend on the nature of the households and housing type, rural or urban. Local authorities will need to engage with intermediaries to design and market effective programmes which will target fuel poverty, while at the same time tackling emissions.

It is likely that the UHS model offering free loft and/or cavity wall insulation could continue, especially in areas that have not yet been targeted. At the same time new model(s) will be needed to promote solid wall insulation – for example in mixed tenure blocks where the volume of work would be greater, and/or in rural areas where the carbon saving will be highest.

In general, design principles of the NRP should include:

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- The need to provide an integrated package of measures for consumers, taking account of both the technical challenges outlined above and of the need to complement energy efficiency measures with income maximisation and tariff advice;
- Geographical targeting towards areas where fuel poverty is most prevalent;
- The need to offer measures in ways which meet consumers' needs and circumstances
- The requirements of existing and new funding streams. We would further recommend that the programmes, at the point of delivery, should be as flexible as possible, so that additional monies can be used to expand the range or scale of ongoing programmes as easily as possible, rather than setting up new mechanisms when resources become available.

Q7: What role should the Scottish Government play in a National Retrofit programme?

The Scottish Government should play the following roles:

- Join up the NRP and more broadly this strategy with other parts of government (eg NHS to help identify vulnerable householders; Scottish Enterprise to provide for training etc)
- Increase Scottish funding in order to meet fuel poverty and climate change targets. The Alliance estimates at least £100m per annum to 2020 is required. Funding should be guaranteed over several years to allow for development of multi-year programmes.
- Put in place a scheme of equity loans for home owners along the lines of the National Lending Unit scheme previously considered as part of the implementation of the 2006 Act
- Data collection and analysis on housing condition; Scotland-wide mapping tool to support fuel poverty identification and allow targeting of areas to maximise ECO spend in Scotland
- Home Energy Efficiency Database should be up-to-date and searchable
- Evaluation of UHIS to inform development of NRP
- Monitor and evaluation of the NRP against government outcomes
- Put in place a quality assurance programme for the NRP – how do we know the installed measures are actually delivered against predicted outcomes?
- Engage with utilities at ministerial level to identify best ways to maximise ECO
- Support development of regional Green Deal delivery to mesh with NRP
- Continue to fund ESSac network and work in partnership to develop and improve the customer journey and ensure benefits are achieved post-installation

Q8: What role could the devolution of additional powers play in achieving more retrofit?

No comment.

Q9: What further action is needed to achieve the scale of change required to existing homes?

- Minimum standards of energy efficiency for the private sector to drive demand for the NRP
- Additional/alternative incentives and support for landlords
- Support local authorities to design NRP programmes which create and sustain local employment
- Use experience of relevant Climate Challenge Fund projects to inform NRP area-based schemes

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- Ensure there is a single brand to support householders and landlords for energy advice – not multiple programmes of varying terms and for single measures
- Ensure the NRP is available to all housing sectors, including the social housing sector which needs support to meet EESSH targets, will help eradicate fuel poverty, and can often provide the ‘anchor’ to area-based schemes and attract economies of scale.

Box 5 – Homes for Scotland proposal

We were very concerned to read, on page 21 of the consultation document, Homes for Scotland’s proposal to improve existing homes which would involve home builders contributing to ‘an *‘off-set’ amount for every new home built to directly improve existing homes within the community’*.

While we do, of course, acknowledge that ‘allowable solutions’ are likely to be required in some circumstances (e.g. a new build flatted development in a city centre brownfield site) it is important to remember that every new home that is built in Scotland adds to Scotland’s overall CO₂ emissions. We therefore believe that, as far as possible, the Scottish Government should maintain its commitment to ensure that liveable, affordable homes are as low carbon as possible, and, if practical, for all new homes to be net zero carbon by 2016/17. If more stringent new build standards aren’t brought in, in line with the Sullivan recommendations, there is a risk that, at some point in the future, these homes will have to be revisited and retrofitted. The costs of revisiting homes for retrofit are likely to be considerably greater than the costs of undertaking the work to deliver the necessary CO₂ savings at the time of construction.

If the government is serious about market transformation, strong new build standards are a vital signal to the building industry and homeowners alike that highly energy efficient buildings are valued and will become the norm in the not too distant future. Backsliding on regulations would do the opposite – send the wrong signals, putting Scotland on the back foot in terms of trying to maximise jobs in green building.

Q10: 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)?

Lead an effective public engagement campaign about energy saving and the NRP – from schools, to community groups, workplaces, shops. The campaign should not just focus on installation of measures, but also more general behaviour change to save energy and gradually shift the cultural attitude to energy use.

There has never been a greater need to mainstream proper face-to-face energy advice. This is not just about providing a signpost to help with installing measures, this is about the delivery of a service to reinforce the community education and change the minds and habits of the public. 1:1 energy advice has shown time and time again to have benefits that reach further than just the delivery of a grant or a loan for physical works. There is a clear social inclusion and money management agenda that can be delivered via a well-managed and resourced advice service.

Chapter 2: the Role of Standards

Introduction:

The Existing Homes Alliance Scotland believes that minimum standards of energy performance should apply across all tenures of housing in Scotland in order to drive a market transformation towards highly energy efficient homes. We believe standards are essential to achieving the vision set

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out in this draft strategy. Our position is set out in detail through answers to the consultation questions and can also be found in a briefing and Q&A which are attached to this response and can also be found on our website at www.existinghomesalliancescotland.co.uk.

Q11: Should the Scottish Government consider whether a single mandatory condition standard (beyond the tolerable standard) should apply to all properties, irrespective of tenure? If so, how would that be enforced?

The Alliance believes that a mandatory condition standard should co-exist alongside an energy performance standard (much as the SHQS exists alongside the tolerable standard today). It is our view that 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. This is similar to the SHQS which is to be met by 2015 (and the proposed standard by 2020) while the tolerable standard applies now. Thus, the minimum condition standard is not a replacement for minimum energy performance standards, but works alongside and supports them.

We believe the current tolerable standard is inadequate in terms of energy performance – it merely requires ‘satisfactory thermal insulation’ with the key indicator being roof insulation with no comment on its quality or depth. The standard for insulation was set in 2006 and now is a good time to consider if such a basic standard is sufficient for making Scotland’s homes ‘fit for the 21st century.’ Given current policy priorities around fuel poverty and climate change and the many incentives for insulation, the Alliance suggests that ‘satisfactory thermal insulation’ needs to be defined more closely such that the insulation genuinely does provide satisfactory performance.

The SHCS 2010 Key Findings report estimated that 3.9% of housing failed to meet the tolerable standard. Over 80% of the failings are in the private sector, demonstrating the success of the SHQS in driving up standards⁴. It is also interesting to note that in the past, the tolerable standard has been used as a catalyst for area regeneration, because local authorities have been able to take action by declaring Housing Action Areas where a majority of houses in an area fail to meet the tolerable standard⁵.

In terms of enforcement, we believe local authorities are best placed to undertake this role. However, there is no doubt that they are under-resourced to deliver on this responsibility. We recommend that local authorities are given sufficient resources to enforce a condition standard, and that the Scottish Government work in partnership with COSLA to ensure local authorities are making progress in this role. Together COSLA and the Scottish Government could establish a reasonable expectation for eliminating properties that are below the housing condition standard. We suggest the following mechanisms offer sensible routes for enforcement:

- Scottish Land and Building Transaction Tax (replacing Stamp Duty in April 2015) could be used to provide an incentive: could be charged at a higher rate for non-compliant properties, with a rebate for purchasers making the recommended improvements within the first year
- Legal requirement at issue of EPC at sale, or within 12 months, to follow on from the suggested incentive.
- Legal requirement for landlord registration; HMO license
- Legal requirement at re-issue of EPC (for long-term rented properties)

⁴ <http://www.scotland.gov.uk/Publications/2011/11/23172215/7>

⁵ <http://www.scotland.gov.uk/Publications/2009/03/25154751/3>

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Q12: (a) In Box 6 we identify a checklist for maintaining a quality home. Do you agree with our proposed hierarchy of needs? Please answer Yes or No. (b) If you think anything is missing or in the wrong place please explain your views.

Yes, we agree with the principle of a hierarchy of needs, but it is not clear how the government intends to use it. Will it be used as criteria for incentives and grants? Will it be used to guide building regulations (eg consequential improvements)? Will it change how ESSACs deliver their advice?

We agree that good housing condition is often a precursor to good energy performance and support 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.

We recommend that the hierarchy be changed to reflect the following points:

- Not everyone has a boiler or understands the meaning of the term, better to say: Check whether your heating system is as efficient as it can be, and if it's not, consider improving controls or replacing it.
- Add reference to draught-proofing windows and doors

Q13. 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 in principle, 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 to which a solution is required.

The approach may vary depending on the level of upgrade planned. If it is to meet a basic minimum standard (for example that the private sector has to meet at point of sale or rental in any case) then it would be reasonable to require the owner to pay for the improvement. If it is a major upgrade, we believe the approach set out in Q14, below, would be more appropriate.

Q14: 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?

Yes. As noted above.

Q15: Should LA's be able to automatically issue maintenance orders on any property which has had a work notice?

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No comment.

Q16: Should the process for using maintenance orders be streamlined, and if so, how?

No comment.

Q17: Should LA's be able to:

- a) **Issue work notices affecting the amenity? and**
- b) **Require work such as to improve safety and security on properties which are outwith a Housing Renewal area?**

No comment.

Q18: Should LA's be able to issue repayment charges for work done on commercial properties, in the same way they can for residential properties?

No comment.

Q19: What action, if any, do you think SG should take to make it easier to dismiss and replace property factors?

No comment.

Q20: What actions can be taken to raise the importance placed by owners and tenants on the energy efficiency of their properties?

We agree that the current housing market does not give enough value to the energy performance of a house and commend the proposals made in this strategy to address this issue in Chapter 3 on Financial Market Transformation. 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, we strongly believe they must be taken alongside the foreshadowing 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 (we suggest from 2015) 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 CO2 emissions compared to potential running cost (as with vehicles gCO2/km count)
- Normalising energy efficiency improvement through the media as with smoking ban and seatbelts campaigns.
- Commit to implementing the Sullivan recommendations on new-build standards. This will send a strong and consistent message on energy efficiency for all homes. In paragraphs 2.44 -2.47 the premiums suggested by the research seem high when compared to the well-

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documented experience of South Lanarkshire College⁶. Secondly, 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.

Q21: Should the Scottish Government introduce minimum energy efficiency standards for private sector housing?

Yes, the Alliance strongly urges the Government to introduce minimum energy efficiency standards for all private sector housing. In order to help meet fuel poverty and climate change targets, we believe the standard needs to be set at EPC band E from 2015 rising to EPC band C from 2020. If the government foreshadows 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 an E standard by 2015 with little difficulty or financial burden.

We support the intention to introduce the Energy Efficiency Standard for Social Housing for 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.

There may need to be a provision for exemptions in exceptional circumstances. It could be useful to explore how the standard proposed for social housing would apply to the private sector, and if it would deliver the pace and scale of change required to meet the climate change and fuel poverty targets.

The SHCS (Table 26, 2010) shows that there were some 66,000 houses rated NHER poor in Scotland at that time. 60% of those households were in fuel poverty – more than double the prevailing rate at that date. Energy prices have risen sharply since those data were gathered, and fuel poverty has risen considerably overall; houses with poor energy efficiency ratings will be particularly susceptible to hardship caused by rising costs.

In addition, the consultation document notes (2.64) that the UK Government has introduced an approach which will, from 2018, ban the rental of houses rated F or G, unless all green deal measures have been installed. Consumers living in PRS accommodation consistently highlight barriers to the installation of energy efficiency measures as a result of the housing tenure, and Scottish Government data (SHCS) shows that a greater proportion of PRS houses are rated NHER poor than is the case in other tenures. However, in terms of absolute numbers, there are more such houses in the owner occupier sector.

We would suggest that an initial focus on the least energy efficient houses EPC F&G because the levels of fuel poverty and extreme fuel poverty among occupants of these houses are very high; there has been little change in the numbers more recently, despite increasing availability of

⁶ <http://www.south-lanarkshire-college.ac.uk/Renewable-Technologies/Renewable-Technologies/low-carbon-house.html>

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voluntary / incentive based programmes; and the numbers of houses involved are relatively small, and so any effects on the housing market, the ability of business to respond or the public sector to oversee delivery will also be limited. This will increase the likelihood of regulations achieving their aim.

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

Q22: How could we amend EPCs to make them a more useful tool for influencing behaviour change to improve energy efficiency?

We welcome 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.

- EPCs should, as will be the case with Green Deal assessments, contain information on typical energy running costs; and
- EPCs should have a higher profile for consumers than is currently the case. In this respect, we welcome existing proposals, for example to include EPC A-G rating more prominently in property advertising.
- Make them available in full as part of the lease pack for assured tenancy (not just in the meter cupboard)
- Make it compulsory that estate agents should make the entire EPC available when looking at property and downloadable from website
- Make more of the running cost, not just the rating band (as with white goods labelling) this appears on P2 but is not obvious.
- Have clear on front page what the “potential” would be if all measures were to be carried out. The “potential” rating on the front page only takes account of “low cost measures” (i.e. under £500)
- Make clear that the running costs on an EPC do not take into account appliance use
- Highlight availability of free impartial advice, from Energy Saving Scotland advice centres, on the EPC
- Enhance the EPC second page to prescribe treatment for the house type
- Tailor advice within EPC for particular house type
- Raise awareness of EPCs and energy costs to prospective tenants/purchasers

Q23: Are there other key principles that we ought to consider when looking at the possible introduction of regulations?

Discussions at consultation events and with stakeholders more widely have shown that there is not yet clear understanding of what any possible regulations might mean in practice – for example, a stakeholder at the Existing Homes Alliance consultation event put forward the view that regulation would require the installation of solid wall insulation to improve the rating of a stone-built, off-gas-grid house, at costs in excess of £10,000.

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WWF's research undertaken by EST suggests that this is not the case⁷. However, this clearly indicates 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. This information should be available from, for example, improvements funded through the Energy Assistance Package and other public sector schemes.

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.

Q24: How could regulation be used to support the uptake of incentives?

Chapter 3 of the consultation document looks at market transformation, and explores issues around the value placed by consumers on energy efficiency and wider aspects of sustainable housing. While a combination of measures will be needed, we would suggest that 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.

Q25: In section 2.68 we identify design options for the standard. Do you have any views on the options set out? Are there others we should consider?

The Alliance supports the introduction of a minimum standard of E on the EPC scale by 2015, with the intention to raise this standard to a C by 2020. We believe this approach:

- Can be clearly communicated and understood
- The 2015 standard of E is easily met with cost-effective measures
- Provision for some exemptions could be made
- The obligation could be passed on to the buyer for one year
- An assessment (eg Green Deal) could identify the cost-effective improvements necessary to reach a certain EPC level for the specific house. There could be different combinations of measures to reach a certain EPC level.

Q26: 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?

It may be worth exploring the proposal for the Energy Efficiency Standard for Social Housing which sets different standards according to house archetypes for the private sector, as it could establish a level playing field across all housing. However, we do have some concerns:

- it could be confusing for the diverse private housing sector – they do not have the experience of social housing asset managers. 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.

⁷ http://assets.wwf.org.uk/downloads/raising_the_standards.pdf

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- 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.
- on balance, we would suggest that regulations not be tailored to property type and location as suggested, at least in the early stages. However, learning from the SHQS experience, it would be appropriate to make provision for regulations to be adapted to do this in future if necessary.

Q27: If you agree with Q26, should houses of the same type in the social and private sectors be expected to meet the same standard?

While we do not agree with Q26, we would note that:

- Registered Social Landlords are able to lease private rented housing to supplement their own housing stock: this housing should be of equivalent quality to RSL stock.
- Right to buy properties should not be more attractive to the market than the private sector by virtue of meeting higher standards: tenants need to be able to find the same quality on the private market.

Q28: Are there other specific issues we need to consider in introducing regulation on the energy efficiency of the home for particular groups of people (older, people with disabilities)

A key test of any possible regulation must be the extent to which it benefits vulnerable and disadvantaged consumers. We believe that this question raises the following issues:

- there remains a need for targeted energy efficiency support (as is currently provided by EAP) for vulnerable consumers.
- experience (for example, delivery of CERT Super Priority Group targets) shows that engagement with vulnerable or disadvantaged groups often requires bespoke approaches, and that information is best delivered by intermediary organisations trusted by different groups. This would be relevant for the promotion of information on minimum standards.
- 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
- it will require careful, co-ordinated, and consistent communication, in partnership with local agencies, as Energy Saving Scotland advice centres do with EAP, and as with the Digital TV rollout.
- Close working with social care staff, hospital discharge response teams, and carers needs to be built in – there are examples of this with ‘Warm and Well’ projects

Q29: Should we consider additional trigger points to sale or rental? If so, what should these be?

The Alliance agrees that the regulation should apply at the point of sale and rental. We also believe consideration should be given to applying standards at the point of major refurbishment or

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structural repairs. The concept of 'consequential improvements' was introduced into Scottish building regulations as part of the 2010 review of energy standards. Current provisions apply to proposals to extend an existing house (where a need to assess and potentially improve insulation levels is identified). We understand an assessment of the impact of this regulation is being made as part of the review for the 2013 regulations. This should inform considerations to use this additional trigger point as it is well-known that energy upgrades can be done more cheaply and with less disruption if undertaken at the time of other improvement works.

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, highlighting the importance of involving linked trades. Further, we are aware that landlord representatives have raised questions about insulation works not being eligible for tax relief, while other improvement works are eligible; a consistent approach to this would be helpful.

Therefore the following triggers should be considered:

- Refurbishment: window replacement, loft conversion, extension, heating replacement
- any works subject to Building Control
- HMO license application
- Landlord registration
- Re-issue of EPC (long-term rented properties)

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?

The Alliance believes that regulation should be introduced with a sufficient notice period, coupled with advice and good financial incentives, to make it relatively easy for the private sector to meet the standard. We do not believe it should be phased in geographically or by tenure as this could cause confusion and be perceived as unfair.

It is critical that any new regulation is simple and effective so that it delivers the intended benefits. We would suggest that application of standards at the point of sale or rental, backed up by continuing access to incentives, represents the best option. This is because mechanisms (landlord registration, conveyancing process) already exist into which regulations could be added. Going beyond this to the application of standards for all housing from a set date would require the development of an entirely new process and delivery mechanism.

We agree with the suggestion that regulation should only be applied after promotional work which should, at the same time, encourage take-up of existing voluntary approaches. However, we would suggest that the prospect of regulation is in itself a driver to encourage voluntary take up, and so we would not favour the application of regulation only in areas where energy efficiency programmes have already taken place, especially given it is expected to take some years for all areas to be covered.

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We also agree that regulation should be focused on the least energy efficient properties initially because:

- focusing on F & G rated / NHER poor properties means that those consumers at greatest risk of fuel poverty are helped first
- the numbers of houses involved are relatively limited, so giving the property industry an opportunity to adapt

Regulation should, however, be designed so that it could be extended to include, for example 'E' rated properties from a future date once processes are established. We note that the bottom of band D is the minimum standard already required in the social sector, and the current consultation seeks views on setting higher standards in some circumstances. It is also the trigger point below which consumers can access assistance under the EAP; this implies that band D is the de facto minimum standard in other circumstances. The Alliance position is that a minimum standard of C by 2020 would be needed to meet climate change targets. In any case, regulation should make clear the 2050 80% emissions reduction target, with clear milestones en route so it is clear what will be required over the long term. i.e. this property meets the standard for 2015: the following work will be required to meet the 2020 standard, etc.

The regulation should also be introduced simultaneously with the new standard for the social sector – otherwise Registered Social Landlords could sell their worst properties to the private sector. SHQS was intended to be applied to private sector, but as this has not happened, this is an opportunity to streamline and co-ordinate work to mixed tenure blocks, support area-based schemes and eliminate confusion amongst owners, landlords, and advisors.

Q31: What other issues around enforcement do we need to think about when considering different approaches to how regulation might work?

If designed and promoted appropriately, we believe that the current conveyancing process should be able to take on board minimum standards without difficulty. As noted above, we believe that the burden should be transferable – once only and for a limited period of 12 months – to the new owner at the point of sale. As well as reducing the burden on the seller, this approach means that buyers would be able to carry out energy efficiency improvements alongside any other work they might wish to do when moving in.

In the PRS, we are aware that other stakeholders are calling for an extension of the landlord registration process so that it includes aspects of housing quality, rather than focusing, as is currently the case, only on the landlord. Should this approach be adopted, such an assessment should also include energy efficiency. The capacity of local authorities (or other publicly funded bodies) to carry out such assessments would need to be proportionate to any new system.

Q32: In sections 2.76-2.79 we suggest that one way of regulating would be to issue sanctions.

A: Do you think sanctions on owners should be used to enforce regulations?

B: Should owners be able to pass on the sanction or obligation to buyers?

We agree that the possible use of sanctions is important to give regulation credibility and ensure its success. However, any sanctions should work, as far as possible, with the interests of consumers.

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Specifically, we agree that 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. It would be wrong to penalise tenants for the wrongdoings of their landlords so meeting the standards should be linked to landlord registration, with the emphasis on giving landlords a decent chance to carry out work: if they don't, they lose their registration and can't operate.

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; however, there will be direct benefit to PRS tenants, who consistently report barriers to the improvement of energy efficiency, and consequent reduction of energy bills, in their homes.

We are aware that some stakeholders have suggested that acceptance of new housing benefit claims should be linked to landlord registration / meeting minimum standards. While this would add weight to the aim of changing the way the market values energy efficiency measures, it would be important that any such approach considered carefully the likely impact on tenants.

In each of these cases, the financial interest of the owner encourages them to take appropriate action. We would suggest that this would be more effective and efficient than designing and delivering a separate sanctions process.

In addition, an incentive could be introduced within the Land and Buildings Tax replacing stamp duty in 2015 so that energy efficient 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.

Q33: The Scottish Government does not intend to regulate before 2015. The working group will consider what options for the timing of regulation might be appropriate, but given the points 2.80 – 2.81, when do you think it might be appropriate to apply regulations?

Given increasing levels of fuel poverty and rising energy costs, we would suggest that regulations should be applied as soon as possible during or after 2015, as a necessary part of the process of the Scottish Government meeting its existing fuel poverty target. However, we also appreciate the need for the delivery of regulations to be effective. We would therefore suggest that the working group should look explicitly at the processes which need to be put in place, including time for promotion of the changes, and should make recommendations on the timing of regulations on that basis. Given the relatively short time period to develop and promote regulation, we recommend that the working group is given ministerial status, a limited timetable (12 months) and a clear remit to develop recommendations for regulating a minimum energy performance standard in all private sector housing within the context of the Sustainable Housing Strategy vision.

The Alliance position is that regulation should be introduced from 2015 for several reasons:

- To give sufficient advance notice to owner-occupiers and landlords
- To drive uptake of the National Retrofit Programme and thereby maximising Scotland's share of ECO and efficient spend of Scottish Government funding
- To drive demand for the Green Deal
- To encourage upgrades of as many properties as possible, as soon as possible

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- To maximise on jobs opportunities for the retrofit industry by creating strong demand for measures

As noted above, it is critical that any new regulation is simple and effective so that it delivers the intended benefits. We would suggest that application of standards at the point of sale or rental, backed up by continuing access to incentives, represents the best option. This is because mechanisms (landlord registration, conveyancing process) already exist into which regulations could be added. Going beyond this to the application of standards for all housing from a set date would require the development of an entirely new process and delivery mechanism.

We agree with the suggestion that regulation should only be applied after promotional work which should, at the same time, encourage take-up of existing voluntary approaches. However, we would suggest that the prospect of regulation is in itself a driver to encourage voluntary take up, and so we would not favour the application of regulation only in areas where energy efficiency programmes have already taken place, especially given it is expected to take some years for all areas to be covered.

We also agree that regulation should be focused on the least energy efficient properties initially so that those consumers at greatest risk of fuel poverty are helped first and because the numbers of houses involved are relatively limited, so giving the property industry an opportunity to adapt.

Consideration should be given to treatment of private rented properties with sitting tenants that do not have an EPC. These tenants are the most vulnerable in this scenario, being reluctant to risk animosity with their landlord through requesting that their home meet the standard

Chapter 3: Financial Market Transformation

Q34: In 3.11 – 3.13 we describe the range of legislative and policy levers that we believe are available to help transform the financial market so that it values warm high quality low carbon homes.

a) Do you agree that this is the full range of measures?

b) Can you suggest ways to help transform the market for more energy efficient homes?

We agree with the introductory analysis to this chapter which concludes that property values do not reflect energy efficiency and therefore running costs of the home. We agree that we need to shift cultural attitudes to energy use such that people value energy efficiency. This market and social transformation will only occur through a synergy of policies and programmes. Bigger carrots and bigger sticks are necessary to send the right signals to the householder and the energy efficiency industry. So along with enabling measures of education and financial incentives, it is equally important to have minimum standards of energy performance established for the private sector. The communication of a standard by a certain date is vital so the market recognises that the sale and rental of energy inefficient properties is unacceptable.

The relatively widespread take-up of solar PV panels as a result of the introduction of FiT payments shows that consumers and industry can and do respond to high profile market signals. However, while there is some indication of increased take up of energy efficiency measures as a result of rising energy costs, these concerns do not yet seem to be translating into mainstream decisions about property purchase or investment.

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The consultation presents a range of measures which are useful, but must be taken in combination with each other to have maximum impact across society. We also suggest 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 upgrade
- Use the Land and Buildings Tax replacing stamp duty to incentivise energy efficiency homes.
- Review legislation relating to the Clean Air Act and urban biomass to allow for approved appliances for district heating to multiple homes.
- Continue to expand the EST Green Homes network to include many more energy upgrades of existing homes
- Showcase energy efficiency upgrades of public buildings

Q35: What changes would be required to current survey and lending practice to enable mortgage lenders to take account of the income from new technologies 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, solicitors and estate agents to take account of renewable technologies present and assess the income and savings from these. We note that the Scottish Government is currently funding the Energy Saving Trust to deliver such an awareness raising programme with solicitors and estate agents, and welcome this.
- Training to lenders to take account of additional income and savings resulting from renewables when assessing for a mortgage

Q36: Section 3.15 lists challenges which may prevent the benefits of more sustainable houses being recognised in future. What further challenges, if any, need to be addressed?

- 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

Q37: Sections 3.16 – 3.22 set out the actions SG is currently taking to encourage greater recognition of the value of sustainable homes. Do you agree that this action is appropriate? What further action is needed?

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As above, we agree that all these actions are appropriate and helpful. However, we would emphasise that the wider context also influences consumers, and emphasise the importance of promoting energy efficiency throughout all buildings over which the government has influence, not just housing. The wider context also includes new houses – it would send the wrong signal 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 building – anything less and Scotland will not be able to capitalise on this economic opportunity.

Chapter 4: New Build Market Transformation

As our name suggests the Existing Homes Alliance's focus is on the existing housing stock. However, because today's new homes are tomorrow's existing homes we also have an interest in the new homes policy agenda, and believe it is important that action to tackle CO₂ emissions from, and fuel poverty in, the existing housing stock is not done at the expense of progress towards zero carbon new build. We are also keenly aware that if we wish to achieve the outcome set out in this chapter: "Scottish companies maximise the potential of innovative design and construction techniques to deliver more, greener homes as part of sustainable neighbourhoods creating export and other economic opportunities" then government needs to set the right framework with ambitious building standards, support for training and innovation, and quality assurance measures.

Now is not the time to backslide on the recommendations in the Sullivan report – we should stay on course for the escalation of standards to net-zero by 2016/2017. This will benefit the new-build sector, but also the retrofit industry. Techniques, skills, and reputation for a green build industry will mean better energy upgrades and help transform cultural and market attitudes to energy use.

We have made specific comments on the Homes for Scotland's proposal on page 21 at question 9.

Chapter 5: Skills and Training

Q43: (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 (b) If not, What other challenges are there?

ExHAS agrees that a focus on the range of areas outlined above would be beneficial in laying the foundation for an SHS. Additionally, it is clear that a strategic approach to delivering on the range of activities suggested is vital and time critical if the SHS is to play its part in reaching carbon reduction targets. This should pull in the expertise of other relevant agencies such as HIE and Scottish Enterprise. This should involve working with local authorities to ensure the National Retrofit Programme and procurement processes around the Green Deal will encourage and support an expanding and increasingly skilled work force.

Developing this strategic approach must become a priority.

Q44. What further action is needed to ensure there is appropriate investment in skills and training to meet these opportunities?

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Supply-side measures such as support for apprenticeships must be maintained at an adequate level, along with support for colleges to deliver training in the installation and maintenance of the wide range of measures which will be required – including in solid wall insulation and micro-renewables. Support for SMEs to access ECO funded jobs will also be central. This, along with a focus on procurement to make it easier for SMEs to win public contracts, would help deliver economic stimuli at a local level. However, demand-side measures are also vital if industry is to invest significantly in jobs and training.

We agree that stability in economic and financial conditions can play a part in building confidence to invest in skills and training. However, it is clear that stability in regulation is also central. Minimum energy performance standards set within regulation as described above would give clear indication of future demand for the industry and lay the basis for the up-skilling of the workforce and investment in training and employment. In terms of incentives to develop skills in low and zero carbon technologies, from design through to maintenance, public support for a wider range of measures in retrofitting programmes will be vital.

Prioritisation of public spending on retrofitting through a National Retrofit Programme would provide further signals which would create the conditions for such investment. We believe that investment in retrofit programmes provide a great opportunity to provide skills and training in poorer communities where fuel poverty will be an issue, and that HAs and councils can partner with bodies such as Changeworks, Energy Agency, Solas, SCARF and the Wise Group to deliver such schemes.

It has been established that countries can ring fence a proportion of ERDF to invest in the energy efficiency of RSL homes, and Wales and France have developed very successful schemes. It is also possible to use ESF to fund training schemes connected to the ERDF funded area based schemes. We also call on the Scottish Government to set aside a percentage of the European Structural Funds that it administers in order to fund housing associations and co-operatives to help meet the ambitious targets set in EESSH and the NRP. The ARBED initiative in Wales provides an excellent example of what can be achieved through this approach, in a country where social landlords do not have to meet the minimum energy standards proposed in the EESSH and objectives of the NRP.

Q46: How do we ensure that skills and training opportunities are provided on an equitable basis to all groups in society?

Q47: 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?

In terms of more representative participation in both training and employment the portrayal of the construction industry as male dominated, low paid, insecure and unskilled must be tackled. While delivery of greater skill levels and security of employment, through measures such as the National Retrofit Programme and minimum energy standards will be useful, more will be required.

Schools generally, and careers guidance in particular, have a role to play in challenging current perceptions and changing the gender balance in the industry.