

**4. Please indicate which category best describes your organisation, if appropriate.**

**(Tick one only)**

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

## CONSULTATION QUESTIONS

**Question 1: Do you have experience, or know of, social landlords acting as 'pioneers' in addressing energy efficiency?**

Yes

**Question 1(a): If 'yes', please provide details, including any web links/contact details you may have.**

DGHP

**Question 2: For landlords, what is the greatest cause of SHQS exemptions in your stock? Is there anything that the Scottish Government could do to assist in reducing exemptions?**

Comments

**Question 3: What has been your experience in improving properties in mixed tenure estates?**

Comments

**Question 3(a): If you have developed solutions to work with owners and/or private sector tenants, please provide details.**

Comments

**Question 4: The Energy Efficiency Standard for Social Housing will directly affect a diverse group of social sector tenants who have individual needs and experiences. In your view, is improving the energy efficiency of social rented housing a priority for tenants?**

Yes

If we get the thermal fabric right the energy cost to tenants will fall even allowing for rebound effect

**Question 4(a): If 'yes', are the suggested 'potential benefits' broadly the right ones? Are there any others you would suggest?**

Comments

**Question 4(b): If no, why is this? How would you suggest we increase tenant awareness of the importance of energy efficiency?**

Comments

**Question 5: Do you consider any particular equality groups will be at significant risk as a result of this new policy? If so, please outline what measures you consider appropriate to minimise risk.**

Comments

**Question 6: Do you think the implementation of the Standard will cause an undue financial burden on any particular equality group? If so, we would welcome your views on what action could be taken to minimise that burden.**

Comments

**Question 7: What else would you suggest to help tenants better manage their energy consumption?**

Lifestyle courses on how to use heat effectively

**Question 8: Do you think that example case studies will be helpful or unhelpful in taking forward the Standard?**

Helpful

Comments

**If you think they are helpful:**

**Question 8 (a): Are these the right range of dwelling types to be represented as case studies? Yes  No**

Comments

**Question 8 (b): Are there any other types (including hard to treat) that you would like to be included as a case study? Yes  No**

**Question 8 (c): If yes please state type and say why you think they should be included?**

Comments

**Question 9: What are your views on using the SAP/RdSAP methodology for regulating energy performance in the social rented sector?**

Having had wide experience of RdSAP and NHER , I am not convinced SAP is the correct tool , it was developed as a compliance tool for new build and is still locked in that mode.

Having modelled dwellings in RdSAP it has a bias towards electric heating, I am not convinced it is correct when you compare the same dwelling across different heating systems, gas, oil, electric

For example your case study 4E/4G mid floor flat 78m2.  
Energy use Electric 349 kwh/m2/year  
Energy use Mains gas 273 kwh/m2/year

It does not relate to occupancy, location, climate, actual fuel costs, all very important when trying to reduce people outgoings on heat and power.

We need a revised NHER type package which can reflect as much as possible the occupant in the building; not the building as if it existed in some notional place called SAPLAND which is what we have at present.

Let's use real numbers with real people.

**Question 10: Do the 'Baseline: 1990 Measures' accurately reflect the energy efficiency performance of dwellings at that time?**

**If not, please provide details.**

Probably,

However it's a bit academic this notional carbon saving, what tenants want is warm comfortable dwellings which are low on energy cost. That means high standards of thermal performance with a defined performance based on energy cost KWh/m2 , KWh/year, KgCO2/m2

**Question 11: Are the suggested improvements in the 'Further Measures' and 'Advanced Measures' columns of the case studies realistic and feasible?**

Yes

We should set the advance measures as the standard now.

**Question 11 (a): Please provide further explanation of any measures that you think should not be included within the modelled case studies.**

Comments

**Question 11 (b): Please provide further explanation of any measures not currently included in the case study modelling that you would like to see included?**

Comments

**Question 12: Taking into account the factors outlined in paragraphs 6.5 and 6.6 of the consultation document, do you agree that establishing a minimum Environmental Impact rating for the main dwelling types is the most practicable format for the standard?**

No

**If not, please explain why.**

The EI rating is calculated from the CO2 and floor area,

$$CF = (\text{CO}_2 \text{ emissions}) / (\text{TFA} + 45)$$

if  $CF \geq 28.3$

$$\text{EI rating} = 200 - 95 \times \log_{10}(CF)$$

if  $CF < 28.3$

$$\text{EI rating} = 100 - 1.34 \times CF$$

It is a meaningless number and frankly a pointless in real terms, it may be suitable for government statistics, however it is unreal and irrelevant to a tenant or householder.

Why not keep it simple use real numbers kgCO2/m2/year, KWh/m2/year

A tenant or any householder will want to know the cost, the EI rating tells them nothing, if you burn wood you will have a low EI rating it does not tell you the running cost of the dwelling.

Energy cost will always be a householder's first concern we need to treat people as adults and use real numbers and not ratings, it looks good but nobody can relate to a rating.

If you tell someone there dwelling is 100m2 and it requires 250kwh/m2 year to heat that's 25000 KWh, the cost can worked from the local fuel cost, MG 4.5p/KWh £1125/year predicted.

For an electric system using off peak 100% heating say 6p/KWh £1500 predicted.

No EI or SAP rating will deliver that information so why persist with the fantasy world or ratings.

**Question 13: If you think that the standard should be a minimum Environmental Impact rating, do you think that there should also be a safeguard that the dwelling's *current* Energy Efficiency rating should not reduce?**

No

Because the EI rating is dimensionless.

**Question 14: In assessing your stock against the proposal for a new standard for social housing, do you foresee any significant challenges in obtaining individual property details across your stock?**

Yes  No

**If yes, please explain why.**

Comments

**Question 15: Do you think that the ratings at paragraph 6.7 of the consultation document are suitably challenging?**

**If not, please give explanations why not and suggest more suitable ratings.**

No

Forget the ratings

Research I carried out modelling existing housing stock indicated that to achieve the 2050 goals we need the following explicit standards not some EI rating.

**Table 9.1 Outline of Thermal Refurbishment Standards**

	Basic	Advanced
CO2	$\leq 30$ kgCO2/m2	$\leq 15$ kgCO2/m2
Energy	$\leq 100$ kwh/m2	$\leq 50$ kwh/m2
HLP	$\leq 1.5$	$\leq 1$
U Values Roof	$\leq 0.15$	$\leq 0.10$
Wall	$\leq 0.2$	$\leq 0.15$
Floors	$\leq 0.25$	$\leq 0.15$
Windows & Doors	$\leq 1.5$	$\leq 1.0$
Hot Water Tank Insulation	80mm	100mm
Primary Pipe work	30mm	30mm

Not forgetting air permeability

**Question 16: Do you think the suggested energy efficiency rating for electrically heated detached homes and bungalows undermines the SHQS? Please explain your choice.**

Yes  No

Comments

**Question 17: What are your views on whether all social rented dwellings should be heated by gas, electricity or renewable heat sources by 2030?**

**Question 18: Do you think that either of the options set aside ('Establish a set of measures that all homes would be required to meet' OR 'Set a minimum percentage reduction in emissions for each of the different dwelling types') should be reconsidered?**

Yes

**If yes, please explain which option you prefer and why.**

Establish a set of measures that all homes would be required to meet, see table Qn 15

**Question 19: Do you agree that the standard should apply to all individual homes and not be aggregated across a landlord's stock? Is this practicable?**

Yes, apply to all buildings not the average

**Question 20: Paragraph 6.14 in the consultation document suggests a way of dealing with those more unusual properties that are harder or more expensive to treat. The approach is to use the 1990 base assumptions to record a baseline for each individual dwelling and then to calculate a set percentage reduction to identify a required improvement. Do you agree that this approach to **unusual dwellings** could offer a reasonable way forward for applying a standard to these dwellings?**

No

We should try and enhance the fabric (EWI) to meet a reduce energy/CO2 standard.

$\leq 30 \text{ kgCO}_2/\text{m}^2$

$\leq 100 \text{ kwh}/\text{m}^2$

**Question 20(a): Do you agree that the percentage reduction for **unusual dwellings** should correspond to Climate Change targets and be set at 42%?**

No

**If not, at what level do you think the reduction for unusual dwelling should be set that will be achievable but provide a meaningful contribution to the improved energy efficiency of social rented housing?**

**Question 21: Do you think that there should be exceptions to the proposed energy efficiency standard? If so, how should they be treated?**

Yes  No

Comments

**Question 22: Are there any other relevant sources of funding that can help social landlords improve the energy efficiency of their stock?**

Comments

**Question 23: Given the range of financial assistance available to landlords, do you agree that the standard can be achieved without disproportionate cost? If not, please explain why.**

Yes  No

Comments

**Question 24: We see an opportunity to advance gender equality in the creation of jobs to undertake the retrofitting works in industries that have traditionally been male-dominated. Your views on how we can maximise gender equality in job creation would be welcome.**

Comments

**Question 25: Are there any other data sources you could suggest to monitor the proposed energy efficiency standard?**

Comments

**Question 26: Would you welcome the Scottish Housing Regulator (SHR) monitoring the proposed standard both in the interim period and longer-term or would you prefer an alternative body to carry out this role? If so, who and how?**

Yes  No

Comments

**Question 27: Are there any other costs associated with monitoring landlords' progress towards the energy efficiency standard?**

Yes  No

Comments

**Question 28: Should there be regular milestones to measure progress towards 2050? If so, what dates would you suggest?**

Yes  No

Comments

**Question 29: Do you agree that setting the longer-term milestones should be deferred until progress towards 2020 can be reviewed?**

Yes  No

Comments



**Question 30: Do you consider there to be any further opportunities within the Energy Efficiency Standard for Social Housing to promote equality issues. If so, please outline what action you would like us to take.**

Comments