

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 checked="" 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 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 No

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

Albyn Housing Society Ltd has owned and operated a community biomass heating system in Aviemore since 2006. It currently serves approx 100 houses.

The Society has also installed over 150 heat pumps in new homes and is currently working with a major manufacturer in live monitoring of a system.

We have undertaken a retrofit of 17 solar PV systems at Aldie, Tain in conjunction with a major energy provider.

The Society has also recently agreed contracts for the provision of external wall insulation to a total of 200 "no fines" houses at Aldie, Tain and Milton of Kildary. The Aldie, Tain project is an ECO pilot project with a major energy supplier. The Milton project also includes the installation of approx 100 air-source heat pump systems and live monitoring of all such heating systems.

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?

The cost of bringing "hard to treat" houses up to the Energy Efficiency Standard is the greatest cost of SHQS exemptions for Albyn Housing Society Ltd.

The Scottish Government could assist in reducing exemptions by providing funding to help ensure that the capital costs of major energy efficiency improvements in areas of multiple deprivation are affordable. This would help RSLs and other landlords with limited financial resources.

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

Limited to date, but quickly expanding.

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

The Society has recently entered into two major contracts for energy efficiency improvements. In each instance, the contractors have offered similar improvements to local homeowners. The Society has helped facilitate owner take-up by taking the lead role in Building Warrant/Planning Applications for the overall schemes and holding “open days” to which owners were invited and encouraged to participate in.

The owner-occupiers in these areas would, generally, not have been able to afford the works without the level of CESP/ECO funding attracted because of the size of the projects.

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 No

Consultation with residents in recent years has highlighted an increasing expectation of tenants that the Society should prioritise expenditure on improving energy efficiency of the housing stock.

In our most recent Resident Survey (May 2012) we asked about any financial problems residents had encountered recently. 45% were cutting back on non-essential purchases, 42% were reducing energy use and 38% on food bills. Following on from this, we asked those who had encountered problems if the problems had got worse, better or stayed the same over the last 3 years. 88% had been unable to pay fuel bills in the last year, and 83% had reduced energy use.

The implications for us as landlord are that, unless we can help to reduce fuel poverty for our tenants, they will be increasingly unable to prioritise rent payments and/or we will face higher levels of disrepair due to inadequately heated homes over the long and often severe winter months.

In the same survey, we also asked all tenants to prioritise the things we could do to improve the quality of their home. 18% identified improved/more affordable heating systems. This was second highest of all priorities, with new windows and doors/less draughts only slightly higher.

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

Yes.

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

[]

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.

[]

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.

[]

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

Robust monitoring regimes (including live monitoring of heating systems).
Understanding heating programmers and controls (through issue of easy-to-use guides).
Training and support from properly trained front line staff.
Guidance on maximising benefits of heating systems, whilst also managing general power consumption for other electrical items.
Education on the reality of energy costs and how they are linked to lifestyles.
Follow up visits and ongoing support.
Take advantage of SMART meter roll out programme (2014-2019).

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

Helpful Unhelpful

[The case studies will be helpful.]

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

[The range of dwelling types could be extended to include hard to treat houses in remote areas outwith the mains gas network.]

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?

Houses of “no fines” construction outwith the mains gas network should be included. This type of housing presents the greatest challenge to the Society for meeting SHQS and the proposed EESSH.

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

RdSAP is a rather crude methodology for assessing energy performance in the social rented sector.

The use of actual “U-values” would be more appropriate when proposing to implement regulations/sanctions.

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

Yes No

If not, please provide details.

Comments

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

Yes No

Yes – for the types of houses in the case studies.

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?

Measures for improving the energy efficiency of hard to treat dwellings outwith the mains gas network.

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?

Yes No

If not, please explain why.

Comments

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?

Yes No

To help ensure that addressing fuel poverty remains a priority in tandem with reducing carbon emissions.

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.

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.

Yes No

Comments

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

Particularly when compared with the SHQS requirement for hard to treat dwellings outwith the mains gas network to achieve a SAP rating of 60.

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

This may be neither practical nor affordable for many dwellings in remote or island areas.

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 No

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

Comments

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 – for dwellings other than hard to treat.

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?**

Yes No

This would help ensure that Landlords are not expected to meet disproportionate costs for upgrading hard to treat dwellings.

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

Yes 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?

It should be set at a level which is affordable to Landlords (net of available grant funding)– without the need to raise rents to an unaffordable level.

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

Where implementing the standard would be at disproportionate cost to the landlord or result in unaffordable increase in rent to the tenant.

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

Not in all cases – particularly hard to treat properties outwith the mains gas network.

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

We would welcome the SHR monitoring the proposed standard.

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

At 2020, 2030 and 2040.

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