4. Please indicate which category best describes your organisation, if appropriate. (Tick one only) **Executive Agencies and NDPBs** \boxtimes Local authority Other statutory organisation Registered Social Landlord Representative body for private sector organisations Representative body for third sector/equality organisations Representative body for community organisations Representative body for professionals Private sector organisation Third sector/equality organisation **Community group**

Academic Individual

Other – please state...

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): <u>If 'yes'</u> , please provide details, including any web links/contact details you may have.
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?
Energy Efficiency Standard - External wall insulation. Eg Listed buildings
Question 3: What has been your experience in improving properties in mixed tenure estates?
Very difficult to get owners involved due to cost, and subletting by absent landlords
Question 3(a): If you have developed solutions to work with owners and/or private sector tenants, please provide details.
Subsidise owners costs to encourage installation of external insulation and door security measures, to provide a fixed cost assisting in forward planning of contracts.
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 □
Question 4(a): <u>If 'yes'</u> , are the suggested 'potential benefits' broadly the right ones? Are there any others you would suggest?
Yes
Question 4(b): <u>If no</u> , 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.
No
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
No' within the Council's own stock all should treated equally
Question 7: What else would you suggest to help tenants better manage the energy consumption?
Regular articles on energy saving in tenant newsletter
Question 8: Do you think that example case studies will be helpful or unhelpful in taking forward the Standard?
Helpful ⊠ Unhelpful □
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
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): <u>If yes</u> please state type and say why you think they should included?
"No Fines" construction and listed buildings as special cases in some age bands due to different possible solutions
Question 9: What are your views on using the SAP/RdSAP methodology fo regulating energy performance in the social rented sector?
New 2012 RdSAP will be the best so far, as it recognises more factors in the property.

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.
Question 11: Are the suggested improvements in the 'Further Measures' and 'Advanced Measures' columns of the case studies realistic and feasible?
Yes ⊠ No □
Question 11 (a): Please provide further explanation of any measures that you think should <u>not</u> be included within the modelled case studies.
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?
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.
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 <i>current</i> Energy Efficiency rating should not reduce?
Yes ⊠ No □

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? <u>If not</u> , please give explanations <u>why not</u> and <u>suggest more suitable ratings</u> .
Yes ⊠ No □
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 □
The new ratings are more realistic in the real world of existing detached buildings
Question 17: What are your views on whether <u>all</u> social rented dwellings should be heated by gas, electricity or renewable heat sources by 2030?
Gas is the fossil fuel of these so, assuming supplies continue to diminish, should be phased out, but electricity supply and demand needs much more careful management and possible state control to regulate supplies fairly. Renewable sources include wood stoves so tree planting could be a resource?.
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.
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?

Question 14: In assessing your stock against the proposal for a new standard

Yes and yes
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 approac to unusual dwellings could offer a reasonable way forward for applying a standard to these dwellings?
Yes ⊠ No □
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?
Question 21: Do you think that there should be exceptions to the proposed energy efficiency standard? <u>If so</u> , how should they be treated?
Yes ⊠ No □
Question 22: Are there any other relevant sources of funding that can help social landlords improve the energy efficiency of their stock?
No
Question 23: Given the range of financial assistance available to landlords, d you agree that the standard can be achieved without disproportionate cost? <u>Inot</u> , please explain why.
Yes ⊠ No □

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.

Question 25: Are there any other data sources you could suggest to monitor the proposed energy efficiency standard?
No
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 □
Question 27: Are there any other costs associated with monitoring landlords' progress towards the energy efficiency standard?
Yes ☐ No ⊠
Question 28: Should there be regular milestones to measure progress towards 2050? If so, what dates would you suggest?
Yes ⊠ No □
2030,2040, and 2050
Question 29: Do you agree that setting the longer-term milestones should be deferred until progress towards 2020 can be reviewed?
Yes ⊠ No □
Question 30: Do you consider there to be any further opportunities within the Energy Efficiency Standard for Social Housing to promote equality issues. <u>If so,</u> please outline what action you would like us to take.