

**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.**

Comments

**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?**

Safe and secure - Controlled entry where owners fail to participate

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

We have improved our tenement properties (ex GHA stock) with owners obtaining grants from the local authority. Funding now limited therefore this makes it increasingly difficult to obtain owner participation particularly when they failed to participate when funding was available.

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

Comments – See above

**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

For some if the landlord was doing the improvements. Tenants unlikely to undertake improvements via green deal as the costs of this is added to fuel bills. Also this may not be viewed as a priority however by owners and absentee landlords. There will be groups of tenants who through fuel choice are living in a lower efficient home than would have been the case had the tenant selected gas heating when given the choice when improvements were being undertaken.

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

In part. We agree that there should be a minimum level of thermal efficiency however we strongly disagree that the standard should include a duty on social landlords to reduce their energy consumption. There are vulnerable people in the private rented sector but there is no duty being imposed on private landlords. This is inequitable. Our Association does, as a matter of routine advise tenants on how to use their central heating system efficiently and we install low energy lighting to all our new build homes however these are very often replaced by the tenants with 'normal' high energy light bulbs. We believe more resources should be put towards free energy advice for all as there are vulnerable occupiers in all sectors.

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

See above – Energy advice campaigns could be undertaken with leaflets in all public buildings libraries, health centres, and citizen advice bureaus, estate agents and RSL's

**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.**

Yes – works to improve energy efficiency may necessitate increasing rents which may minimise or eliminate any potential savings on energy.

**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.**

It will cause an undue financial burden on tenants who are not in receipt of housing benefit or part housing benefit. These tenants may still be on a very low income but do not receive full housing benefit either as a consequence of non dependents or the bedroom tax.

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

See question 4a and 4b

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

Helpful  Unhelpful

Not enough house types and floor levels considered

**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?**

Stock with Solid walls & different floor levels in tenements.

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

Yes providing all rdsaps are used as RSL's will have EPCs based on 3 different RD Saps otherwise RSL's would need to incur significant wasteful expenditure re surveying the stock to replace EPCs that would still be valid for a number of years simply to obtain the relevant SAP data. Also we currently carry out an EPC when the property becomes void. We will now have to incur the cost of having an EPC carried out across all our stock.

**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

May not be achievable however where tenants refuse work.

**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?**

Yes  No

**If not, please explain why.**

There should be a minimum rating for both Energy efficiency and environmental impact providing the landlord is not expected to explain the ratings to tenants. This is and should remain the remit of energy advisors. RSL's do not typically employ energy advisors.

**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

See above

**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.**

Yes  No

Providing the test of reasonableness is taken when it is not affordable or practical to do further improvements to meet the standard. The standard should be a goal but not mandatory.

**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?**

Not feasible or affordable in rural areas. Also this takes away the element of tenant choice.

**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.**

Too complicated and onerous. The EPC ratings are more transparent.

**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 it should apply to individual homes using the EPC base to provide a minimum level of energy efficiency for all tenants with exemptions on the basis of affordability of improvements eg mixed tenure blocks .

**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

Comments

**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?**

Too complicated and arbitrary

**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

Recognition that there are obstacles due to tenant refusal and or issues related to mixed tenure blocks and or finance. Abeyance or exemptions should be provided for in these instances. We have plans in place to replace boilers with band A condensing boilers however there will be a significant number of these outstanding by 2020. It would not be affordable or cost effective to replace these boilers before the end of their lifecycle.

**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

Whilst most RSL's will have asset management plans in place to improve energy efficiency of their stock and will use their best endeavours to achieve this in reality it is likely that the funding for the improvements will require to come from the rental stream. This must therefore be viewed against a backdrop of welfare reforms which will put increasing pressure on RSL's and tenants alike. Also increasing downward pressure on grant levels for new build and the upward pressure on costs due to raised standard will make it exceedingly difficult to deliver social rented new build within the funding available.

**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

Cannot see how this could be achieved however in the interim period given that the tenant charter has been agreed and not due for review for several years.

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

Yes  No

The cost of resurveying after improvements are undertaken and the cost of the new EPC.

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

Yes  No

Little point until progress towards 2020 has been reviewed.

**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