

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	X
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 X No

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

I have worked in an association who installed solar panels in new build development 2001. Their benefits against cost were dubious.

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?

Much of our stock is traditional sandstone tenements. The problem is and will be to achieve energy efficiency standards in solid wall construction.

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

Since the establishment of the association we have improved all of our tenemental properties which are mainly mixed tenure. This work attracted grant funding. There have been occasions when work has not proceeded due to a lack of approval from owners.

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

We act as factors for most of the multi tenure stock. We have clear policies to enable us to use the provisions in the titles and legislation. This is often time consuming and is not always successful, although in the main it works.

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 X No

It will be for some tenants, however for properties already achieving a high energy efficiency standard it won't be the case. The views of owner occupiers need to also be considered in multi tenure blocks. There is a risk that the approach will not be consistent due to lack of buy in from owner occupiers.

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

The potential benefits are broadly correct. The responsibility for educating residents about energy efficiency should not be the sole responsibility of landlords and more detail is required regarding management of the responsibility.

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

N/A

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.

This policy may result in increased rent levels, the increased rent may be more than the potential savings through energy efficiency resulting in tenants being financially worse off. Many of the people likely to be worse affected will be the people who are just outside the housing benefit eligibility criteria. Owners in multi tenure may struggle to fund any works.

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.

I do not know if owners should be described as an equality group but they may struggle to fund upgrading works unless financial assistance is offered and this may dilute the principal. Also there is a risk that the private rented sector will not wish to or be able to comply.
We are also interested to know why the social housing sector has been singled out for this standard when carbon reduction applies to industry, commerce, transport etc.

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

Better information about and simplification of available tariffs.

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

Helpful X Unhelpful

Case studies over a range of construction types resulting in model solutions will be helpful and will quantify the problem/solution.

If you think they are helpful:

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

There will always be a need to increase the number of dwelling and construction types and these types might be particularly relevant to specific landlords.

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?

The majority of our stock is traditional solid wall, sandstone tenements and due to the destruction in our area we have a large number of exposed gables; we need to find a solution for this type of property.

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

It is important that the new standard sets out the minimum requirements using the previous methods used to produce EPC's otherwise landlords will be unable to use existing data which has been produced. If this work has to be redone to a new standard it will be at significant expense. Assessing landlords current levels of pass and failure rates will require additional survey work.

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.

The 1990 baseline is based on assumptions and they are out of date.

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

Yes No

Yes, however each RSL will need to assess the affordability of the measures. RSL's have restricted income streams and some of the measures may not be fundable without additional money. Low energy lighting is on paper easy to achieve, however many tenants do not find this type of lighting acceptable; RSL's have no control over the type of lighting used by tenants.

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

Heating controls will if used properly assist the efficient running of the

heating system, unfortunately they are only as effective under ideal circumstances and subject to local modification. This is not a reliable control.

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?

Different form of heating such as district heating or combined heat and power.

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.

Environmental Impact will be a more difficult concept for tenants to understand; carbon reduction is less clear to the user than energy efficiency and financial savings.

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

N/A

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.

N/A

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

The ratings will be very difficult to achieve in some instances. As explained

we have a number of tenemental properties which have double glazing, cavity and loft insulation, modern boilers and heating controls but still fail the proposed standards. It may prove very difficult to economically improve to meet the proposed standard.

An element of reasonableness requires to be understood in terms of the physical and financial practicality of the proposals.

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 X No

These properties are no more difficult to modify to achieve the standard than some other difficult types so why make this exception, unless this is linked in some way to the recognition that owner occupiers will be seriously challenged.

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 is an impractical aspiration, especially in more rural areas unless the government persuades energy suppliers to extend the networks. Renewable energy is relatively expensive.

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 X

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

N/A

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 is important that all properties are upgraded to meet the standard in order for all tenants to benefit; aggregation could still leave some inefficient properties whilst meeting a standard.

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 X No

We agree with the principal of the approach. This would be a minimum standard that could be improved dependent on available funding.

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 X

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?

The 42% target is an arbitrary reduction and bears no significance to housing properties, if this were the case it should be applied to industrial properties and transport and all other sectors. However in reality. Nobody can really say what would be a reasonable reduction without knowing the cost and technical implications of trying to achieve such a target.

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

Yes X No

There will be situations where it is not economically practical to achieve the standard. Many landlords already have asset management plans in place which cover the period up to 2020, and some may not have the financial capacity to cope with the burden of meeting a more challenging energy standard.

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

The current range of energy efficiency funds is confusing and difficult to access. Easier access to energy provider's funds would help.

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 X

The financial assistance to landlords in the longer term is unknown, At this time it is not possible to predict the costs associated with achieving the standard. There are too many unknowns, Our concern here is that consultation is being carried out on what is an unknown unquantifiable standard and that it may prove to be very expensive Current funding schemes are not always accessible to landlords.

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.

Improved training and encouragement at school and college. This is a specialist subject in itself and worthy of greater focus but we ask why you feel the need to advance gender equality.

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

Perhaps but not that we can think of.

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 X No

The SHR would be the obvious choice given that we report to them already on SHQS and other KPIs

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

Yes X No

As landlords carry out energy efficiency improvements they will require to re-assess the energy rating of their stock. In many cases this will require the use of consultants and will have a cost attached, it will also require the reproduction of EPCs once they reach their expiry date.

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

Yes X No

We do agree but do not know what is a practicable set of dates. We currently measure progress towards the standard in the annual APSR, this may be one form of reporting on progress.

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

Yes X No

Technological and production advances will have an impact on aspirations.

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.

We have no comment to make on this subject.