

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.

We have 'pioneered'/tried a variety of energy efficiency measures in new build properties and retrofitting over many years, not all of which have been successful. Early 1990s a new build project in Alexandria which had solar panels and underfloor heating with electricity as main back up to solar – ended up in dispute with design & build contractor and had to retrofit gas boilers and radiators. This scheme continues to give us problems as the system is so complex for tenants to use and solar gain does not appear to be of benefit. A more recent new build has solar panels and economy 10 heating in an off-gas grid area – Rosneath, Argyll - tenants do not consider the solar panels improve energy bills. We have retrofitted air source heating in properties in Rhu — still awaiting monitoring results. The plant required is large and not suitable or practical for some properties. Similarly installed air source heating in a new build this year in Lochgoilhead –an off-gas grid rural community - too new and not yet tested over the winter to determine if it is a system we could or want to install elsewhere. Main problems with pioneering new systems is tenant's ability to understand the systems and useage compared with manufacturer's expected norms often varies considerably. Reliability of actual installation and results compared with what is 'sold' as energy saving and efficient systems do not always meet expectations.

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 rating for properties off-gas grid – and no prospect of gas main being extended – some villages are 20 miles and more away from a gas main. Scottish Government should ensure that off-gas areas are given priority access to grant funding and energy supply companies providing the energy efficiency measures should be better prepared to deal with small scale projects such as those found in rural communities.

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

Owners generally do not want to participate – experience for example of them refusing to pay share of renewal of door entry systems – hence properties failing the SHQS standard. We have not yet tackled energy efficiency measures in mixed tenure estates, but have no doubt that it will be difficult to get owners' co-operation without guarantees of grant for their

share of costs.

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

As factors, we offer repayment terms to clients if they are unable to pay larger one-off costs at one time.

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

Whilst we have not specifically asked that question, when surveying tenants about what they see as being the priorities for their home, more often it is improving kitchens, bathrooms and boilers – the latter because of their reliability rather than efficiency or because older system boilers take up so much room.

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?

For many tenants, what is more important is managing chaotic lifestyles and demands of family. The Scottish Government could be more persistent in advertising the benefits of energy efficiency – on prime time TV for instance. Also, educating children at school about energy efficiency and maybe they will take these lessons home.

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.

Any vulnerable and low income households, including older people and those whose lives are in crisis and for whom any installation of complex systems that they have to have more intense involvement in controlling. Having to implement the standards could result in rents having to rise to pay for the additional costs – increased rents may well cancel out the benefits of lower energy bills – rent poverty is a growing concern especially with the on-going welfare reform changes.

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.

See answer to Q5, above.

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

Manageable, realistic and simple advice for tenants. Ensure that the organisations that provide energy advice are giving the correct information, not just something to promote a product that may or may not work for a particular property. Simplified and lower supplier tariffs. Simplified technology.

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

Helpful Unhelpful

Manufacturers and suppliers promoting products have a vested interest and may not necessarily be promoting the best product for particular properties and areas – what works in an urban setting may be completely unsuitable in an exposed rural area. Similarly, what works in sunnier and warmer climates, even in England, may not be suitable for Scotland. Case studies to prove what does and does not work particularly for retrofitting to off-gas properties would be particularly 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

No fines construction types do not appear to be covered.

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?

Off-gas grid properties in general, particularly those which are non-traditional construction.

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

There are already several versions of energy assessments so the new standard should ensure that these are incorporated so that landlords are able to use existing data that has been gathered – don't change what is there; add to it or ensure that there is an easy means of converting current data.

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

Yes No [not sure]

If not, please provide details.

Basis of arriving at this baseline not certain so unable to comment

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

Yes No

To the extent that these only relate to properties linked to the gas grid. Properties off gas, with wet electric central heating systems will still fail the energy standard. Landlords have little or no control over tenants' use of low energy light bulbs.

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.

Tenants would better relate to the Energy Efficiency rating as it can be more easily quantified and described in terms of potential cost savings to the tenant. The rating proposed is impractical for electricity for off-gas and therefore little alternative for retrofitting without significant disruption and in some cases completely impractical – e.g. suggestion of ground source heating or district heating unsuitable in many locations, especially mixed tenure estates.

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

Comments

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.

Resource intensive at a time when we are already having to gear up to deal with Welfare Reform changes. Disruptive surveys of older properties not practical for occupied properties and our turnover is so low there is little chance of getting adequate sample surveys completed across all stock types. If we have to do disruptive surveys of stock when void, this will increase void times (loss of rental income)

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 [not sure how to answer this]

Question is ambiguous. The ratings are too challenging to achieve for off-gas grid properties. The standards need to take better account of practicalities and of affordability both for landlords and for tenants.

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

There needs to be a recognition that some properties by their very nature will not, even with practical retrofitting measures, never measure up to more 'efficiently built' and newer dwellings. This 'lower' standard should apply to all properties which are off gas grid

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

Impractical unless there are significant and reliable improvements in technology within the next few years as the capital investment we do now should not result in having to go back and fix it as all too often happens just now with pioneering technology which RSLs have already installed. The

technology for the users (the tenants) needs to be simplified before forcing change on them.

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.

RSLs have already made a significant contribution towards carbon reduction and improving the lives of tenants. Any option needs to recognise this and the difficulties of making additional improvements, where all practical and affordable measures may already have been done.

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?

We would suggest an aggregated standard would be more practicable.

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

We may have already spent significant amounts on those properties since 1990 and the calculation does not appear to take account of this.

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?

Off-gas grid properties may never achieve the 42% reduction, however, many other properties which were unusual and not fit for purpose have already been demolished and more than contributed to the climate change target reductions.

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

Off-gas grid properties especially those with adjoining owners and properties with older or vulnerable tenants where installation of complex solutions may be of no benefit as they may not understand how to use them.

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

Rural areas need to be better targeted and the small scale of rural developments are not attractive to current installers who are looking for greater economies of scale.

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

We are uncertain about the longer term prospect of financial assistance for RSLs, which makes it difficult to plan ahead. Some of the current schemes are not accessible to many landlords for various types of work and for properties which are outwith designated postcode areas. In many cases where the scale is not large enough, the assistance is also not available at all. At this time it is not possible to know what the costs associated with achieving the standard are, one because we don't know what the standard is, and two, until a full assessment of our housing stock in terms of compliance with a standard has been completed, the costs are unknown, Even once a compliance check has been carried out, the costs will depend on which measures are most appropriate for each individual property. We need to be careful that the costs do not impact on rents.

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?

Making a database on the current EPC information more readily accessible to RSLs.

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

As we already report to the RSL, this would be an efficient proposal rather than increasing the bureaucracy of setting up and having to report to another body.

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

Yes No

As landlords carry out energy efficiency improvements they will require to re-assess the energy rating of the buildings concerned, in many cases this will require the use of consultants and therefore will have a cost attached. We will also require to reproduce 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 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