

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.

Dunedin Canmore Housing has a wealth of experience in addressing energy efficiency in both existing and new built housing. Currently, DCH has upgraded 97% of its housing stock to meet the SHQS. This including addressing the energy efficiency issues where possible by bringing the NHER rating of the properties to 8, well exceed the minimum efficiency standard of 5 set by SQHS. Adding to this, DCH also has the expertise in dealing with mix tenure properties, in particular, experience gained from the Moredun Hyvot Stock Transfer refurbishment works may be useful when dealing with improvement works in mixed tenure blocks.

As DCH has always put sustainability at the heart of its business, the organisation also has excellent experiences in building highly innovative energy efficient homes, from the pioneering Slateford Green development and the biomass communal boiler in Lasswade Road, to the more recent The Quarries sheltered housing complex and the EcoHouse in Hyvot where a semi-detached house is heated by air source heat pump partly powered by solar PV panels.

Our Planned Maintenance team also has recent experience in managing the following areas:

- Biomass boilers in Lasswade Road - Biomass is neither new nor pioneering, however installing it into a common heating system within the City of Edinburgh is. Although this promotes energy efficiency and eradicating fuel poverty, ancillary & rising fuel costs prohibit this. Overall the analogy of "small is beautiful" does not apply to smaller biomass installations.
- Heat metering solution retrofit at Slateford Green - The heat metering solution being retrofitted at Slateford Green is pioneering, especially for Insite (billing company) and the Association, and was carried out in a direct response to feedback from residents in this eco-friendly development. This installation will ensure a fairer charging system, and whilst prepayment is not an ideal solution (as it is seen as more "penalty" tariff by many sections of society), we have minimised the tariff and there are nil administration charges within this tariff. Basically we do not wish to make money from this scheme, only pay the full costs of the gas consumption by residents. It is hoped that by utilising this scheme the overall consumption of the development will reduce, thus reducing costs further. It will be interesting to see if and how SAP / RdSAP will incorporate heat metering in the calculation and its effect on EPC ratings if any.

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 represents the majority of our failures in meeting SHQS, when properties cannot be accessed / where the tenants are refusing access.

With regarding to assistance from the Scottish Government, expansion of the existing datazones with regards to the allocation of CESP funding would be useful. We have approx. 200 or so properties (not all energy fails) sitting just outside a datazone in North Edinburgh.

Where properties in mixed tenure blocks are concerned, cooperation from the private owners and residents is likely to be a challenge, if there is no legislation requiring the private sector to comply with similar energy efficiency standard.

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

Historically Dunedin Canmore utilised the Edinburgh Stair partnership. However we took destiny into our own hands following the implementation of the Tenement (Scotland) Act 2004 by forming a factoring arm within the Group to provide factoring services and common area repairs within tenement stairs where DCH had a majority ownership. Once this was in place it allowed common repairs and services to be delivered far better. However this proved to be a very rocky path and there are still some issues with recovering the costs, shared equity issues and also private let properties. It should bear in mind that energy efficient improvement works is not covered by the Tenement (Scotland) Act, which make refurbishing mixed tenure blocks to improve energy efficiency difficult, especially there is no current standard to bring private sector on to a level playing field with the RSLs.

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

As per answer in Q3 above. Plus utilising the example of the overcladding exercise at the Findlays, where we utilised a standard security model, along with a shared equity solution to facilitate assisting elderly owners to have energy works carried out to overclad their homes (steel framed and walled homes) without the financial burden of a large bill at the completion of work. Similar model was also used in Moredun Hyvot Stock Transfer refurbishment to provide an owners assistance scheme together with an Owner Refurbishment Grant from the City of Edinburgh Council meeting a minimum 50% of the private owner's costs (mean tested).

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 acknowledging that improving the energy efficiency of our housing stock must be a priority for all our tenants, this alone will not bring full benefits to all the tenants, even if appropriate energy advice are provided. In particular, low income households will particularly be at risk. With the proposed welfare reform also looming in the horizon, low income households may have to make the hard choice between providing food, paying rents or heating their homes. Fuel poor households are likely to spend more time at home, thus have a higher energy need from other groups. Also this group of tenants is also likely be the one not heating their home properly in the first place. Therefore the saving and benefit that come from the energy efficiency improvement may not be realised by them. In term of energy awareness, social landlords should be, and many have already been, providing trainings and advices appropriate to the energy needs of their tenants. However, more general education on energy and sustainability issues may be more effectively if coming from the Scottish Government and the Local Authorities targeting not only social tenants but occupiers of the private sectors at the same time. DCH's view is that improving the energy efficiency in socially rented housing is a priority for the organisation, whereas reducing the utility costs is the priority for the tenants. In an ideal world one would lead to the other, however in practice this is not the case. Great emphasis and resources has been expended by the Association in providing both insulation works to properties and also the provision of energy advice to its customers. We maintain that doing the work is all well and good, however the key to reducing consumption is providing education on the most efficient ways to heat your home, coupled with an efficient switching service which breaks down barriers to all customers, no matter how they pay for their utilities.

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

See above.

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

See answer to Q4 above. Increasing tenants awareness of the importance of energy efficiency is important, however a full scope of home energy advice needs to be in place to effect a behavioural change within tenants.

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.

See answer to Q4 above.

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 Q4 above.

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

- For schemes with communal heating systems, heat meters should be introduced to ensure a fairer way for the energy used to be paid for. However, it may not help RSLs meeting the proposed energy efficiency standard, as RdSAP may not be able to capture this in working out the energy ratings of the properties. The market for energy payment collection and heat meter management is also limited in the UK at present.
- For other tenants, other than education, there is not really much which could affect reducing consumption following the installation of energy measures. Ending the penalties for utilising prepayment metering solutions could be effective in reducing costs for a number of our tenants, however it may not ultimately reduce their consumption.
- The proposed standard should provide more details on how RSLs are expected to “encourage tenants to reduce their energy consumption” and how this is monitored under EESSH.

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

Helpful Unhelpful

The case study typologies will be useful for those landlords who have not assessed their stock and categorised them into archetypes already. For those that have archetyped their stock already being forced to utilise the typologies stated within the consultation document may prove fatal in them being able to move forward with any software or databases that they have constructed around these archetypes. In any case, RSLs must be clear that those measures in the case studies are examples only and individual RSLs will need to assess their own stock to work out the best energy efficient measures that will suit the properties and the tenants and achieve the improved energy ratings required by the standard.

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?

Some non-traditional, multi-storey homes. There are also no construction types on this type list.

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

Whilst it is sensible to use the information from the same EPCs for assessing the energy performance of the properties before and after the improvement works in order to avoid duplicated work for the EESSH purpose, SAP / RdSAP does not present an accurate picture of the energy consumption and carbon emissions of a particular property. This is because RdSAP / SAP assume UK average weather data (as opposed to local weather data) and standard conditions of occupancy and use, which are far from difference of the occupancy and life styles of some of the social tenants. However, given that it will not be possible to monitor every tenants' energy usage pattern, this is consider to be a fair way to capture the typical carbon emission of a property.

Also, RdSAP / SAP programme are constantly being updated. Each version of the programmes appears to produce slightly different results for the same properties. Scottish Government will need to consider this and to address any potential non-compliance of EESSH because of the change of versions of the programme.

It is noted that, as part of the peer review process, Scottish Government has asked the external experts to redo the modelling using a newer version of RdSAP (RdSAP 2009 v0.01). We would welcome the opportunity to compare the modelling of the dwelling types done under the different versions of EdSAP to see the differences.

Overall, we should utilise the SAP/RdSAP methodology to regulate energy performance, as this is what it was designed for. HAs have a legal obligation to produce EPCs so we should utilise the information more.

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.

Dunedin Canmore are well in advance in the SHQS improvement works in our stock. Currently 97% of our stock meet the SHQS standards including the energy efficiency element where possible. Therefore the accuracy of the baseline levels may not be so critical for DCH's stock.

However, the setting of the 1990 level will need to be representative to the social housing stock in Scotland, so that realistic / achievable EESSH standards can be set. These could be critical for social landlords who have a high percentage of older stocks that have not had energy efficient improvements carried out to them.

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

Yes No

Although the measures suggested are feasible and applicable to the building types listed, they may not be applicable to some particular situations. Also the consultation paper has not considered some operational difficulties when implementing the measures. For examples: applying internal insulation to solid wall will require properties to be emptied and will reduce the floor area of a property; installation of double glazing in a listed property in a conservation area will require Planning approval. As such, there will be situations where the feasible improvement options are limited.

With regarding to the actual list of measures:

1. The latest version of Product Characteristic Database does not have main gas combi boiler that has efficiency as high as 91%. The efficiency of most combi boilers are now below 90%.
2. The options for renewables are limited to solar PV and solar thermal water heating. There are potentially other renewable options that could be considered such as heat pumps which are likely to be more effective in off gas properties than any other form of new electric heating systems. It will be good to see more energy efficiency measures to be assessed and incorporate so that social landlords will have a wider range of recommended options to consider for their different situations.

The measures are realistic however we would comment that the resulting EPC results are doubtful. Most RSLs with a forward-looking SHQS and improvement programme will already have replaced the double glazing and boilers by 2015 on a baseline assessment of 1990, as standard life cycles will have dictated this. The efficiency of these may now be lower in the new Product Characteristic Database resulting in a lower EI rating. It will however, not be effective for RSLs to replace them before 2020 if their life cycle are out with the first milestone.

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

See answer to Q11 above.

We also have concerns over the inclusion of the 100% low energy lighting aspect – as tenants can change this and affect future results and targets.

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?

Renewables? All item should be modelled as per the elements assessed within the RdSAP data collection model for EPCs. Standardised data should be the key.

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.

Yes. However, although establishing a minimum Environmental Impact Rating for the main dwelling types will allow the Scottish Government to estimate the potential reduction of CO2 emission of the social housing properties, it does not really provide a true picture of the level of emission from each of these dwellings. This is because the SAP methodology and EPC process only use standard assumptions and data from the external weather conditions averaged in the UK. It does not take into account of the life style of the occupants, many of whom in the social housing properties are living very differently from the assumptions used in SAP.

For social landlords, the primary concerns for our tenants in terms of energy issues must be the eradication of fuel poverty. Whilst it cannot be denied that setting a minimum EI rating for all the social housing properties will assisting in this course, on its own, the new Standard will not entirely help those in fuel poor to combat fuel poverty if they are already living in energy efficient poverties.

It is envisaged that the proposed EESSH standard will cause some of the properties already been upgraded to meet the SHQS programme to be further upgraded to meet the minimum EI ratings. All these become apparent when comparing the ratings stated in the case studies appended the EESSH consultation document and the minimum SAP ratings proposed for each building type.

Although this is not addressed in the EESSH consultation but in the Sustainable Housing Strategy consultation, private landlords and owner occupiers should be required by legislation to ensure their properties meet a minimum energy efficiency level, which should be comparable to those required by Social Landlords under SHQS, so that the whole housing stock in Scotland are at a level playing field. The current proposed EESSH will only widen the gap between social housing stock and those of the private sectors.

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

Agreed that EE rating post improvement should not be worse that pre-improvement, as this will ensure the tenants will not be paying additional energy costs after energy efficiency works. RSLs will have to be more innovative to use the appropriate measures in their improvement, starting with improving insulation of the properties.

However, we would urge the Scottish Government to take the opportunity in the proposed standard to do more to address fuel poverty issues, not merely reducing and measuring carbon reduction to meet the Climate Change (Scotland) target, which is the current main purpose of the proposed standard.

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.

No, but some rejigging of the stock assessment data may be required.

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

No, as they broadly reflect the levels of the SHQS we have established in our own improvement works. However, given that RdSAP is about to be revised, this may have an effect on the level of EPC ratings.

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

They should, so far as practicably possible. However ex-mining properties may benefit from receiving free supplies of coal and will be reluctant to change this to another heating source, which they will need to pay for (although there are fewer of this type of household each year).

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.

Agreed with the reasons for rejecting the option in 6.10.1.
Option detailed in 6.10.2 is unworkable, as landlords who have been proactive in the past and brought their portfolio up to at least SHQS standard, would then be tasked with making a further saving (potentially 42%), which would be impossible to achieve and will be unfair.

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, we agree the standard should be applied to all the individual homes.
Yes. We think that it practicable to achieve this, as landlords should hold data for each individual unit of their portfolio.
However, there will be properties that will be difficult to access or tenants that are resistance to refurbishment work (DCH currently has approximately 3% of our properties not achieving SHQS because of this reason). Hence the proposed standard should look into this and makes recommendations to assist social landlords to monitor and to manage improvement to these hard to assess properties.

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 approach would be a reasonable way forward as long as there are some ways to recognise any energy improvement works carried out to the properties during SHQS programme. We will need to know the final definition and proposed percentage reduction set to assess the impact on our "unusual properties".

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?

Again, we want to make clear that the 42% should be the improvement from the calculated 1990 baseline level without taking into account of any improvement RSLs have managed to include as part of their SHQS programme. If the baseline is calculated to include energy efficient measures already installed, there will be no cognizance taken regarding the works previously carried out to these properties by landlords. 42% reduction

would represent an impossible target if works had already been carried out.

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

The only exemptions should be where tenants have refused the work to be carried out and where obstacles are encountered in mixed tenure blocks. However properties with resistance tenants should be rectified on the next void cycle and also tenants should be lettered each year, as perceptions, needs and understanding of works changes with time. With regards to mixed tenure block, the situations may improve if the same minimum energy standards could be applied to the private properties so that they are on a level playing field with the social properties.

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

The list of funding in the consultation paper and Annex B seem comprehensive. However, as CERT and CESP will soon disappear and be replaced by ECO, the Scottish Government could assist social landlords by updating the funding table in Annex B on a regular basis and issue to all RSLs through SFHA.

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

No. The costs illustrated in the case studies seem to be for installation only. It is likely in some cases, there will be other project costs involved in the works to comply with the proposed standard. These are planning permissions, building warrant, professional consultants, and legal fee for engaging owners in mixed tenure blocks. These are unlikely to be fundable by most the initiative listed.

In terms of funding, there are other issues affecting RSLs.

- CERT is dwindling away albeit will be replaced by ECO.
- CESP datazones need looked at again to ensure that they do not just include the same old "identified social areas" and look at the wider picture.
- Both Green Deal and ECO will benefit and be driven by the householder, not the social landlords. Also householders will directly fund these works through the increase in utility bills, so not entirely helping fuel poor households.

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.

No comment.

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

No. Agree that HEED and SHCS are the appropriate data sources for monitoring the proposed EESSH standard.

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

Yes, it makes sense to have the Scottish Housing Regulator to monitor the proposed standard instead of introducing an alternative body.

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

Yes No

Internal monitoring must be carried out and dedicated staff should carry this out, this will be a landlord expense and a necessary one if the landlord is to succeed.

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

Yes No

Yes. The 1st milestone should be 2020, with targets every 5 years following this, up until 2050.
It will be useful if the target of 2050 be set earlier. This will allow those RSLs wishing to improve the energy efficiency of their properties to the 2050 standard sooner to plan ahead.

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

Yes No

See answer to Q28.

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.

No comment.



SCOTTISH GOVERNMENT CONSULTATION ON DEVELOPING AN ENERGY EFFICIENCY STANDARD FOR SOCIAL HOUSING – RESPONSE FROM DUNEDIN CANMORE HOUSING LTD

With reference to the above consultation, please find the enclosed copy of our Respondent Information Form and Questionnaire all duly completed.

The considerations behind our responses can be summarised as follows:

1. The proposed standard aims to reduce carbon emission by improving the efficiency of the building performance. However, this alone will not help to reduce energy use and to assist the fuel poor. The Scottish Government should be urged to take this opportunity to do more to address fuel poverty.
2. The proposed standard currently does not apply to privately owned properties. This will potentially pose difficulties for social landlords with properties in mixed tenure blocks when carrying out improvement works. We ask the Scottish Government to consider applying the same standard to the private sector, in order to bring a level playing field for all.
3. The consultation suggests a list of potential measures that will improve the EPC ratings with associated installation costs. It is suggested that the cost of meeting the proposed standard will not be much more than meeting the energy efficiency element of the SHQS. Dunedin Canmore Housing suggests that there are other potential costs that the consultation has not taken into account of in certain situations. These include Planning, Building Warrant, consultants, and legal costs (if private owners are involved in mixed tenure properties) etc.
4. The standard proposes that the progress of compliance should be monitored by the Scottish Housing Regulator (SHR), which is not likely to take place until 2017-18. Interim measures for data collection could be through Scottish House Condition Survey. This seems a reasonable approach.

Should you have any queries regarding our responses, please do not hesitate to contact the undersigned

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