

**4. Please indicate which category best describes your organisation, if appropriate.**

**(Tick one only)**

Executive Agencies and NDPBs	<input type="checkbox"/>
Local authority	<input checked="" type="checkbox"/>
Other statutory organisation	<input type="checkbox"/>
Registered Social Landlord	<input 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.**

Fife Council and Kingdom Housing Association's recent development at Dunfermline are examples of good practice in this area (e.g. Passive House Standards).

**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?**

The anticipated greatest cause of exemptions in the Falkirk Council management area relate to the Energy Efficiency component of the SHQS and concern:

- Hard to treat properties of a 'Non-Traditional' Form of Construction;
- Costs of gas extensions to 'Gas Desert' areas.

Abeyances are likely to be required where:-

- Owner occupiers are able to block insulation measures in mixed tenure properties, where the Tenements (Scotland) Act 2004 (as amended) does not apply, due to specific provisions in the title deeds (e.g. 4-in- Block type properties).

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

We have had limited success in our High Rise blocks in terms of gaining owners' participation in a Combined Heat with Power Programme. Communication of the benefits was essential in securing their participation.

It is acknowledged that energy efficiency improvements are now subject to majority decision making under the Tenements (Scotland) Act 2004 (as amended) however, individual title deeds particularly in 4 in-block type properties, can supersede this in some cases. This has limited our ability to progress work in mixed tenure estates.

Affordability of repairs being carried out at the same time as energy efficiency improvements also impacts on owners' willingness to participate. The free insulation offered under the Universal Home Insulation Scheme

(UHS) has helped with this situation but has not completely resolved the problem.

Owners' unwillingness or inability to clear loft spaces has also prevented improvements going ahead, even when costs are nil through the UHS. There is also a lack of awareness of new loft storage platforms which can address this issue.

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

In 2007 Falkirk Council embarked on installing a new Combined Heat & Power (CHP) hot water and heating system into 6 high rise blocks, which included owners. The number of owners participating in the CHP programme was increased as a result of the Scottish Government's agreement to include the CHP in the Energy Assistance Package. This resulted in a higher number of owners qualifying for the grant, allowing them to enjoy the benefits of the CHP, lower fuel bills and increased thermal comfort.

The UHS has included "blocked" properties in an attempt to encourage owners to insulate their home where affordability was a key deterrent in the past. This has had some success and is being repeated in the 2012/13 scheme.

The introduction of the Tenement (Scotland) Act 2004 as amended has allowed the Council to develop policy and procedures to promote and progress necessary work on mixed tenure properties, where the Act applies.

**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

A recent satisfaction survey carried out via our Tenants' Newsletter has shown that Repairs Services are the key priority for tenants. However, concern over heating costs is also a priority for a number of tenants, especially those on low incomes or those with electric storage heating. Energy efficiency standards are therefore a key concern in terms of their relationship to fuel poverty.

Tenant information and education about the links between condensation, fuel costs, and energy efficiency standards is an issue which requires to be addressed at a local and national level.

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

Yes, we agree with the potential benefits suggested.

**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.

Falkirk Council does not have sufficient data to evidence whether any particular equality group would be at risk as a result of this policy.

**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 Q.5

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

The following actions may help tenants better manage their energy consumption:-

- More effective media advertisements promoting energy efficiency,
- Education in schools,
- Smart metering, and
- Face to face personalised advice

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

Helpful  Unhelpful

In principle the case studies are helpful however they need to be revised to more accurately reflect the true performance of older buildings. There is a risk that if these estimations are over optimistic, that this could result in an under-estimation of the true extent of the scope and costs involved in meeting a revised energy standard.

Currently one-quarter of Falkirk Council's housing stock is of non-traditional

construction, which can be further sub-divided into 27 principal non-construction types. These properties are likely to present the greatest challenges in compliance. Ongoing improvements in standards will result in an increasing gap between these and the most efficient properties. It is therefore suggested that a phased approach to their improvement is given consideration.

It is important to note that improving energy efficiency standards may eventually lead to the demolition of these 'hard to treat' types of properties as improvement would be uneconomical / unviable. This will in turn have a direct impact upon housing availability as social housing 'new-build' programs may not replenish lost stock for some considerable time.

**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 X

Hard to treat property types should be added to the range (e.g. non traditional).

**Question 8 (b): Are there any other types (including hard to treat) that you would like to be included as a case study?** Yes X  No

**Question 8 (c): If yes please state type and say why you think they should be included?**

Non-Traditional forms of construction should be given particular emphasis in case study examples as these properties often present the greatest challenges in relation to Energy Efficiency targets including achieving those specified in the SHQS.

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

The Standard Assessment Procedure (SAP)/'reduced' Standard Assessment Procedure (RdSAP) is currently utilised in the production of Energy Performance Certificates (EPC's) and is a key component in assessing compliance with the Energy Efficiency element of the SHQS. It would therefore be beneficial to retain this widely used methodology in any proposed energy standard, to ensure consistency of approach and a recognisable benchmark in the period up to 2015 and beyond. The SAP/RdSAP methodology is reviewed on an ongoing basis to take account of regulatory and technical developments that have arisen.

5.11 of the consultation document states that: "*The current published edition of RdSAP is RdSAP 2009 (v9.90). However, RdSAP 2009 (v9.91) will be implemented in Scotland in October 2012; this is to take account of the*

*Green Deal and the Energy Company Obligation (ECO). The final standard will be drafted in relation to RdSAP V9.91".* The SHQS standard allows for compliance assessment based upon a number of versions of the SAP/RdSAP methodology (2001, 2005, & 2009). Consequently, Falkirk Council and presumably other Local Authorities will already have energy assessments for their properties based upon earlier versions of the methodology.

Should the proposed standard require assessment in terms of RdSAP V9.91, then there are potential implications in terms of re-assessing the performance of stock based upon an updated methodology (additional data collection, running energy assessments, utilising new software, etc).

**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.**

It is questionable whether the SAP ratings stated in the 'Baseline 1990 Measures' are reflective of what the actual performance was in 1990, as the estimate is not verifiable. It appears the ratings may under-estimate the performance of stock in 1990.

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

Yes  No

We would suggest that the 'further/advanced measures' are further developed through case studies and within the framework of a national forum.

In terms of feasibility, whilst Local Authorities have successfully managed a series of small scale initiatives to date, the overall success of a "National Retrofit Programme" will be determined at a national level by funding streams and the allocation of associated powers.

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

Some 'standard' remedial measures included within the modelled case studies e.g. cavity wall, may not be possible nor appropriate for all construction types, and advanced measures may need to be factored in to the modelling process.

The appropriate 'advanced' measures could perhaps be determined via a

process of consultation involving all local authorities (National Forum, APSE, Etc).

The case studies need to be more flexible to accurately reflect the true nature of 'actual' methods of construction. Developing modelling solutions as opposed to case studies, allows the content to be accurately tailored to model the specific solution.

**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?**

No 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 X

**If not, please explain why.**

Any standard used must be able to deliver energy efficiency savings, supported by staff expertise, which can be easily understood by the public. Replacing the current assessment method for social housing will be costly and may cause further confusion. In terms of achieving carbon reduction, the SAP approach is more likely to achieve results as detailed in Question 9.

**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 X  No

If the Environmental Impact rating is adopted, it is crucial that the current minimum energy efficiency rating of a property does not reduce. Any new standard should always have the effect of improving the energy efficiency performance of the housing stock.

**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 X  No

**If yes, please explain why.**

If the existing assessment method changes and an Environmental Impact (EI) rating replaces the current SAP/RdSAP methodology, this will present challenges as outlined at Q9.

In addition, New build properties may be difficult to compare against existing standards. However, we acknowledge that progress reviews will need to occur as the energy efficiency standards improve over time and a rolling programme will be necessary over time.

**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 X No

These standards are significantly challenging as, with the exception of the proposed standard for detached dwellings and bungalows heated by electricity, they represent an advance upon SHQS requirements. As stated at Q13 the proposed standard should not facilitate a reduction in performance required by the SHQS.

It is not possible to quantify the scale of the challenge until the requirements are costed for our individual stock. See also Q 16.

**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

We are not in support of a lesser standard at this stage for electrically heated homes. The SHQS for energy efficiency should be viewed as a minimum standard which should be improved upon by encouraging the use of technological developments and efficiencies.

Electric storage / panel heating are inefficient methods of heating homes, particularly for those with families and on low incomes. This does not mean that improved and effective electric heating cannot be seen as a replacement. Costs and lack of suitable tariffs also affect the viability of electric heating.

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

We would support this in principle but it is not possible to reach a conclusion



on this issue due to lack of data on the scale of coal and oil heat sources still in operation and the cost and feasibility of alternatives. Renewable sources are desirable and need to be supported financially, based on efficiency. At present the costs between renewable technologies and conventional fossil fuelled systems are too wide to encourage installation of renewable heating systems on a large scale. The position may change longer term (e.g. due to fossil fuel price increases, fuel poverty, and related targets for carbon reduction).

**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.**

No comments.

**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, the proposed Energy Efficiency standard should apply to individual homes in keeping with existing methodology for measuring SHQS compliance.

The new standard should be viewed as an extension of the existing monitoring processes. The Scottish Housing Regulator has issued guidance encouraging the implementation of Asset Management Plans by Local Authorities, and this area of work can be closely related to any monitoring processes required by the SHQS and the proposed new 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  No

Yes, in principle this proposal is reasonable, however the practicalities require to be tested for the range of non traditional construction types.

**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 X  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?**

Whilst we agree that it is reasonable to have a target, we would propose that this should be different for non standard and standard construction types. Further work needs to be undertaken to establish how this target would be achieved, detailing co-ordinated methods on how this will be delivered. Establishment of a baseline is critical to the process of setting targets.

**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

Whilst we would not generally support exceptions, we require clearer qualification on non traditional stock. The introduction of blanket exemptions is not supported as it can result in a reduction in the positive aspirations of landlords for the future and can lead to avoidance.

We would therefore support the use of exemptions/ abeyances where the implementation of the Energy Efficiency standard is proven to be prohibitive and / or impractical. This would enable individual applications on a case by case basis and a decision reached based upon the individual merits of the property, as is currently the case with the SHQS.

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

No. However funding streams will be essential in underpinning and supporting the delivery of the proposed targets.

**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

Resourcing the standard will be a key challenge and costs require to be quantified.

In Scotland the Local Authority housing portfolio is almost exclusively

comprised of stock from the period predating 1990 which will result in significant cost implications. In addition, any change in the assessment methodology in respect of the proposed standard would also have resource implications.

To meet the longer-term national targets of a 42% carbon reduction, significant resources will require to be made available to local authorities to guard against rent increases in the social sector.

**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.**

We would welcome any measures to advance gender equality, and equalities in general, for example through promotional activities at schools. There may be opportunities in the Modern Apprenticeships and other training schemes within Local Authorities to do this.

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

Utility companies may have data to help monitor energy standards, however it is unclear whether it would be held in the format required.

**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

The SHR would be the preferred regulator for the proposed standard given their existing regulatory responsibilities in relation to social housing providers.

**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

There should be regular milestones set in order to measure the progress towards the improved Energy Efficiency targets by 2050. We would suggest that targets should be set following the assessment of progress towards the 2020 targets.

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

Yes  No

Whilst the 2020 targets have been specified, the current focus is upon meeting the SHQS by the 2015 target date. It would be beneficial to evaluate the experience and performance of social housing providers in relation to the SHQS post 2015, to help inform the process of establishing future milestones.

**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 comments.