

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.

The Association completed a development that included photovoltaics and a district heating system using combined heat and power in 2006. Contact details are as above.

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?

Comments

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

Encouraging other owners to take up funding available to them on hitherto relatively generous terms has been critical. However as noted in more detail in the separate response to the consultation on Scotland's Sustainable Housing Strategy, in mixed ownership blocks other owners have not always received accurate and reliable advice from utility companies' agents.

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

As noted above, to date continued engagement with other owners about the programming of work has been critical. This has required allocating time and resources to ensure that other owners are informed about programmes and that consents are in place timeously.

However the apparent complexity of the Green Deal means that a much more detailed consultation process should be anticipated in future. Encouraging other owners to participate may raise consumer protection issues, as the Green Deal appears to be a predominantly market based policy initiative.

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

The Association is in general terms supportive of an Energy Efficiency Standard for the social rented sector that will benefit tenants.

The proposed Standard should reflect social, as well as other, dimensions to sustainability; households living in fuel poverty being a high level sustainability indicator in its own right.

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

It is not entirely clear from the consultation where the emphasis will lie. While in paragraph 5.13 it is proposed that the energy efficiency standard will be based on either the Energy Efficiency Rating or the Environmental Impact Rating, chapter 6 proposes that the minimum standard should be based on the Environmental Impact score. It is noted that the Energy Efficiency Rating addresses running costs, which would impact directly on tenants, while the Environmental Impact Rating deals with CO2 emissions.

There appears to be a danger that the choice made could reflect current political priorities rather than significant issues affecting future sustainability, and may fail to address what is important to local communities.

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

Comments

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.

Comments

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.

Comments

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

Comments

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

Helpful Unhelpful

Comments

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?

Comments

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

As noted in the response to question 4(a) above, the consultation is not absolutely clear which measure will be used, with paragraph 5.13 proposing that the energy efficiency standard be based on either the Energy Efficiency Rating or the Environmental Impact Rating, but chapter 6 proposing that it be the Environmental Impact score. As already noted, the Energy Efficiency Rating addresses running costs, which would impact directly on tenants, while the Environmental Impact Rating deals with CO2 emissions. At face value therefore it would appear that there may be a danger of the use of renewable technology being encouraged in place of low energy measures and design. Specifically in relation to the RdSAP process, concerns have been expressed that it may not accurately reflect Scottish buildings and climate, particularly traditionally build tenements in urban areas. As the proposed Energy Efficiency Standard for Social Housing will vary for different dwelling types, it is important that it is based on strong scientific evidence and that it takes account of any such bias in the RdSAP process if that process is used.

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

Comments

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.

The SHQS has been based on Energy Efficiency Ratings, which appear to have more direct relevance to tenants' energy costs. The proposal to establish a minimum Environmental Impact rating presents a shift in emphasis.

There seem to be two parallel energy policy debates, with the first centred on the costs and benefits of renewable energy and the Scottish Government's carbon reduction targets, while the second focuses on the impact on consumers of rising energy costs, and rising levels of fuel poverty. In so far as it relates to social rented housing, the debate needs to be better balanced to reflect consumers' interests, and the Environmental Impact rating suggested does not seem to do this as well as an increased Energy Efficiency Rating would.

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

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.

The challenge presented would be one of the resources required to categorise individual dwellings into house types for modelling, and carrying out studies of the most appropriate energy improvements in each case. There are obvious implications for how stock condition information is gathered and held, which could be particularly onerous for relatively small Registered Social Landlords with diverse ranges of stock presenting few opportunities for wide scale cloning of information.

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

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?

Comments

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.

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?

Comments

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?

Comments

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

Comments

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

Comments

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

Comments

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

Yes No

Comments

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