

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.*

Comments

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

For Manor Estates

Tenants choice :9 tenants have refused any form of central heating – mainly due to age, not wanting disruption, happy heating one room at a time, and do not want assistance during installation.

Tenants choice :1 tenant does not want cavity wall insulation due to concerns on whether it could cause damp issues in longer term.

Disproportionate costs :29 properties were new builds in 1996 with electric heating and have low SAP ratings and heating systems are not at end of useful life for number of years / disproportionate cost to replace now.

Build type :1 property has low SAP rating due to experimental build in the 1950s, looking at ways to insulate it effectively.

Owners not cooperating :Likely that we will have a number of properties failing on lack of door entry system due to not receiving Owners agreement to proceed and we will look for exemptions– up to 118 further fails.

To assist we would hope that the Scottish Government could look to fund RSL's directly to undertake improvements in external wall insulation where cavity wall insulation is not an option.

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

Comments

We have a high proportion of Owner Occupier properties – 430 factored owners against 960 of our own stock. We have a mechanism to charge

owners for essential repairs however we need full agreement from all parties before we could proceed with “improvement work”. Generally we are not approached by owners wanting to carry out improvements.

Using the door entry installations as an example, some 70 stairs require a door entry system, involving 368 owners. We struggle to get a majority decision on a stair. Manor Estates has no mechanism to pay owners share first and recoup money when works are not essential.

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

Comments

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

Comments

Yes, tenants desire homes that have low running costs. This is likely to become even more of a priority when families face reductions in benefit credits and the continuing rise fuel and food prices.

This desire is reflected in the fact that generally tenants will allow access to carry out insulation works / replacement heating systems / meter installations.

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

Comments

Potential benefits – lower fuel bills, address fuel poverty – however increases in fuel prices could wipe out any savings gained.

Opportunity cost to household - perhaps lower fuel bills could allow households to heat the property for longer /or at a higher level at same cost as previous.

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

Comments

Mailshots showing benefits of some basic measures – low energy lighting etc., accompanied by access to free bulbs, or “modern” style bulbs at discounted cost.

Funding mechanisms need to be in place for RSL’s first.

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

Many RSL households pay a premium tariff for having a card meter meaning less of their income is available for paying the actual fuel use. Reducing this premium tariff in line with other tariffs should be a priority put to Utility Suppliers.

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

Information on cost per day / evening on standard appliance use would be useful for households to see what their lifestyle is adding to the essential costs.

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

Helpful Unhelpful

Comments

Case studies will be helpful, provided the costs and SAP reductions are fairly accurate, as they will allow RSLs to assess the examples against their own stock base and see where they could maximise SAP reductions for minimum expenditure.

Access to advice agencies to assist with option appraisals based on case studies would assist in taking the Standard forward.

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

Yes, but feel we need more types represented, especially Scottish Special HA house types which are standard across many towns and cities.

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

Essential that there are Case Studies on hard to heat no fines properties – both houses and flats. These were standard build types and were constructed as part of a huge building programme meaning there are some in every town.

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

Comments

This would seem logical since RSLs are required to produce SAP data in EPC certificates for each new tenancy.

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

Generally, on sample analysis, yes they appear to reflect the energy performance of the dwellings at the time.

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

Yes No

Comments

Further measures – for example, electric heated water tank with 80mm insulation, fan storage heaters, combo boilers:

Further measures appear to be achievable however a longer lead in is desired to ensure replacements are not required to take place before end of useful life.

Advanced measures – for example, Internal insulation, under floor insulation, 20% roof solar PV:

There has not been sufficient feedback on successful Solar PV conversions nor information covering on-going maintenance profiles. Accurate future maintenance costs for new technologies, including solar panels, should be broadcast. Together with information on maintenance of the actual roofs.

As a charitable housing association we run our components to maximum life cycles. Most of our A grade boilers installations have been since 2000. We have a considerable amount of properties with boilers predating A rated but which do not reach end of life until beyond 2020. By 2020 we could have approximately 100 properties not on A grade boiler, however anticipate that life cycle renewals mean we could remedy this position in 5 – 7 years beyond 2020 target.

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.

Comments

Personally, would prefer to stick to the Energy Efficiency rating as it is the

one we are used to.

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

Because the calculations are carried out are quite prescriptive then properties may drop a couple of points, so if this method is used, I think you should state that properties should not drop below xxx percent.

We are governed to an extent by tenant choice, versus best value for money. The RSL should not carry the penalty if any tenant refuses "gas" heating, as alternatives to electric heating can add huge amounts to budget.

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.

Comments

No, we expect to hold property records pertaining SHQS 2015 standard and will map the differences against further measures target.

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

We would prefer the standard to incorporate "a percentage of existing RSL stock to meet the ratings" for example 70%. As a stock transfer RSL we have a number of inefficient property types, which we are working to improve however meeting the ratings would cause a huge funding burden if 2020 target was stipulated.

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

No it does not undermine the SHQS as,we could be looking for exemption on disproportionate cost in SHQS timeframe, but be planning to improve.

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

We are governed to give tenant an element of choice. We can state our preference to tenants however we cannot force them to take an upgrade. Biggest challenge will be for our off gas network installations (14), existing no heatings (9), existing electric heating by choice (8).

Existing stock not readily convertible to heat pump technology without considerable cost. Also, community renewable heat technology is very difficult to plan in retrofit due to finding suitable location for boiler unit.

There is a danger that rushing into new technologies could lead to missing some "real life" negatives. It is important that where organizations have installed and found issues, or installed and subsequently removed these new technologies, that lessons are broadcast and issues not repeated.

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

Applying to all individual homes is the ultimate goal however due to landlords funding and meeting charitable aims we must keep some flexibility, aggregated as a percentage across stock is our preferred method.

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

I feel we would need to see the case studies, to ensure that we were not being asked to undertake a super costly makeover just to reduce a few SAP points.

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

Manor Estates stock base has 366 “no fines” out of 960 properties, only 19 of these have been externally insulated. Around 300 of these no fines fall into mixed tenure blocks. With our stock profile 42% reduction would appear unachievable.

You are starting with a very poor energy inefficient product however due to mixed tenure estates you cannot be certain what method of upgrade you could arrange and in what timescale. 42% target is far too ambitious. I think you need to take any saving you can get.

In addition we do not want to get caught in a costly base modelling exercise.

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

In same way as SHQS

Tenant choice
Owners withholding consent
Disproportionate cost

And add in

Awaiting next life cycle renewal

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

No, not unless funding is granted directly to the RSL.

We struggle :

to see a viable funding mechanism for our situation.

to get any funding through poorest postcode allocations because we are penalised by having small pockets of properties in a dispersed stock base. Pockets which utility companies say are too small and do not want to touch.

because there were a large number of RTBs on our "estates" in the late 1980's, 1990's the incidence of these owners have brought many of our properties out of the poorest postcode statistic areas.

to see how we could get owner occupiers to participate and know that they have funds available.

Manors stock is largely urban not rural, many funding regimes suit rural areas.

Staff resource to source the ever changing funding options is very costly to the organizations.

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

SHR has monitored SHQS and has successfully tied SHQS returns into the APSR reporting cycle.

If this was achievable it would provide a one stop shop for RSLs. We would however need a mechanism in place for developing and agreeing exemptions etc.

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

Yes No

Comments

An annual return / cycle tied in at 31 March each year would minimise resource and eliminate any requirement to do double count exercises.

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

Yes No

Comments

Halfway there would seem logical however again would prefer to see "percentage of total stock" achieving. A longer lead in than 2020 would be essential to work out funding plans. Associations do not want to rush into finance restructuring until necessary as costly to renegotiate loan terms.

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

Yes No

Comments

Setting percentage of stock achieving each category at each milestone would assist, as some properties will already have achieved target or could by the next lifecycle change.

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