

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.

In terms of energy efficiency in new-build properties we have extensive experience of a varied range of building methods, including:

- structural insulated panels (SIP);
- insulated concrete forms (ICF);
- dynamic insulation;
- modular off-site construction
- district heating;
- retrofit positive pressure ventilation with heat recovery;

all with varying degrees of success.

Being off the gas grid and in an area of high fuel poverty, OHAL has been trialling the retrofitting of air-to-air and air-to-water heat pumps in houses that previously had solid fuel fires with back boilers.

The air-to-water retrofit also involved the injection of Icynene spray foam insulation into the cavity of the timber frame.

While we are yet to be convinced of the suitability of solar PV, we have installed panels on one property this year as a trial.

Question 2: For landlords, what is the greatest cause of SHQS abeyances in your stock? Is there anything that the Scottish Government could do to assist in reducing abeyances?

N/A – All our stock complies with SHQS

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

So far we have mainly been carrying out loft top-ups and cavity wall insulation filling, and have not yet engaged with sharing owners, some of whom have already taken up the offer of UHIS work independently of OHAL.

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

Comments

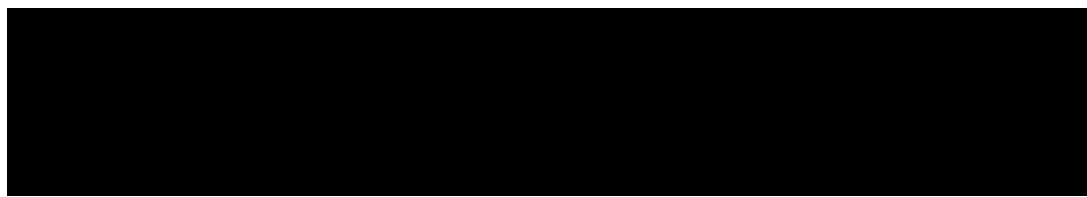
Question 4: The Energy Efficiency Standard for Social Housing will directly affect a diverse group of social sector tenants who have individual needs and experiences. In your view, is improving the energy efficiency of social rented housing a priority for tenants?

Yes No

While many of our tenants have been receptive to messages about energy efficiency measures, and have engaged with our efforts to enhance their insulation, for a significant proportion, energy efficiency could not be described as a priority.

The extent of fuel poverty among our tenants – 45% in 2010 and only likely to have increased significantly by now – means that many are not heating their homes fully. Because of this, they may not have energy efficiency improvements at the top of their list of priorities, despite these being something that could help them.

For example, we are currently topping up around 300 lofts and filling all appropriate cavities before the end of CERT funding. In the letters we sent out we emphasise that we are always looking at ways of improving our service to tenants, and go on to say that one way of doing this is to ensure that their homes are insulated to the latest standards, which will not only cut heat loss, but should also help reduce annual energy bills.



Other tenants have refused access to their homes, but largely on the grounds of other personal reasons, or saying their homes are already warm enough. We have not, so far, pursued a harder line with these tenants, but may have to in order to meet any new standard.

In terms of persuading tenants of the benefits, then it must be seen as the 'norm' to have this kind of improvements carried out, and so the actions of neighbours and others in the community will be important influences.

In face-to-face conversation with tenants about energy conservation and energy efficiency, I have often spoken of how other tenants have been able to save money, or of the benefits I've felt from having extra insulation installed in my own loft, rather than just telling them directly that the work is necessary.

Ongoing delivery of education and advice is needed to help tenants understand the basics of issues such as their electricity bills and heating systems.

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

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 Question 4.

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?

Awareness raising methods such as energy monitors are one way that tenants can get to grips with what they are using in the home.

OHAL has been fortunate to have secured 100 energy monitors from the James Hutton Institute in Aberdeen and is currently running a project – OrkCEmP (Orkney Community Empowerment Project) with them to see how these benefit tenants who have them installed. There are currently around 90 in OHAL properties, with installations taking place from August 2011 to the present, advertised through our newsletter and offered door-to-door. Several households have already given anecdotal evidence of having been able to reduce electricity usage through a combination of awareness of the amount used being displayed in real-time on the monitor and, where applicable, more focussed use of Economy 10 off-peak times.

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

Helpful Unhelpful

They are helpful to the extent that they help to focus on the range of improvements that may be necessary to bring certain types and ages of stock, although there are obviously outliers in the system.

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

They certainly cover the ages and range of properties that we have in our stock. However, following on from mentioning the increase in timber-framed dwellings, it is not clear whether any of the case studies actually addresses this type of dwelling.

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?

It would be useful to see specific case studies for timber-framed dwellings off the gas grid for the periods 1992-98 and 1999-2007.

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

We prefer the use of NHER ratings for energy performance measurement, and understand that this software will be able to be used to regulate energy performance under the standard.

The reason OHAL has used NHER is that it gives the opportunity to take location into consideration, unlike RdSAP until its latest version.

Also, electricity as a fuel source for heating is still unfairly penalised in Orkney, where 70% of the annual electricity demand is now being met from onshore wind generation.

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.

The absence of a specific timber frame case study would point to the fact that the case studies are not reflective of energy performance at the time. See Question 8 (c).

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

Yes No

While some of the measures, such as for enhancing of double glazing and installation of newer storage heaters, appear to be realistic and feasible, the one that stood out as potentially expensive and difficult is the replacement of electric immersions so that they have 80mm factory applied foam. In the majority of our homes the immersions are already in areas that are heated, and often cupboards with little or no additional room for such an increase in

the overall volume as would result from this added insulation depth. The cost of the work to replace them might outweigh the benefit of the measure.

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

We remain to be convinced of the usefulness of retrofitting solar PV in Orkney, not only due to the standard of workmanship that we have seen on some private homes and on one house that we are trialling PV, but also due to the geographic location.

Solar PV is essentially a carbon reduction measure rather than energy saving, and in terms of reducing energy usage education should come before 'eco-bling'.

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?

Has there been an analysis of whether it would be cost-effective, and give a better score in environmental impact terms, to replace older double glazing with triple glazing, rather than just replacing 'pre-2003' double glazing with 'post-2003' double glazing?

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 possibility that our timber-framed houses with storage heating - due to being off the gas grid – will not meet the Environmental Impact rating without the expensive addition of some type of renewable generation such as solar PV or solar thermal.

If this is an energy efficiency standard, it seems an odd choice to go for Environmental Impact rating to set the standard, when this can have very little to do with energy efficiency.

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.

Comments

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 in the case of electrically heated homes. The energy efficiency score remains the same as for SHQS. However, it is SAP 2001 software that requires a score of 60 to pass SHQS, whereas the current SAP 2009 software requires a score of 63. This suggests that all electrically heated homes have to reach a score in 2020 that is less than the SHQS target for 2015.

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

Depending on the software version used for the standard scores, in this consultation, it may be that all electrically heated scores are undermining the SHQS targets. See Q15.

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

With only a very small number of houses that have heat sources other than gas, electricity or renewables, this is not a major issue for OHAL. However, with Orkney now producing an annual average of around 70% of its electricity demand from renewable generation, it is crucial that this is taken into consideration when assessing the carbon count on heating Orkney homes. There is little point in setting emissions targets that then do not take into consideration the realities of local renewable generation.

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?

Yes, as long as there is room for exceptions in certain circumstances.

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?

Very few, and historically many funding sources have excluded RSLs.

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

Some improvements may involve decanting tenants, which is very expensive. This could be a significant barrier to large-scale programmes of work going ahead.

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

Software for SAP/NHER calculations, and also administration time and staff time for organisation of programmes.

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

Yes No

Every five years from 2015 onwards.

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