

**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 ✓

**Question 1(a): If 'yes', please provide details, including any web links/contact details you may have.**

We believe that over the last five years Aberdeen, Falkirk and Fife Councils have been innovative in piloting a number of district and renewable heating schemes and trying to address energy efficiency, from a domestic heating perspective, having extensively trailed a number of renewable technologies for high dependency groups and in both urban and rural locations.

**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?**

SHQS exemptions are likely to be most prevalent within certain non traditional stock categories. The numbers of rtb owners within these areas may impact on our ability to develop feasible solutions to SHQS and EESSH. Targeted ring fenced grant assistance through emerging energy initiatives would significantly improve the potential for meeting standards.

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

Approximately 80% of the Council stock is in blocks where there are other owners and private landlords. There are continuing challenges in securing revenue and capital repairs in these blocks, and whilst we use the provisions of the Tenements Scotland Act where feasible this does not always enable work to proceed. We are now commencing our core SHQS externals programme and again envisage significant numbers of SHQS abeyances in blocks where majority consent to proceed cannot be obtained.

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

SHQS and emerging EESSH investment requirements are likely to place significant financial burdens on many RTB owners which will compromise the Council's ability to coordinate common work. The 2006 Housing Act places the emphasis on support and advice to owners rather than direct financial intervention through the likes of PSHG or equivalent, and there are limited resources available to the Council to support grant programmes in any case. The Council is investigating the potential to utilise the new Green Deal and Energy Company Obligation (ECO) to provide funding which could be integrated into investment programmes and be directed to assist owners to participate.

**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 ✓

Recent increases in energy costs have had a greater impact on social rented tenants due to a higher proportion of households being on benefit, on lower incomes or being not in work or retired. As a result a higher proportion of our tenants spend more time at home during the day.

Therefore energy efficiency, for space heating, is of course an issue however there are a range of competing interests at a tenancy level. These include the cost of rent, having modern facilities such as new kitchens and bathrooms, all of which tenants may prioritise over energy efficiency given individual choice.

In particular many tenants are reluctant to change from either solid fuel or electricity (storage heating) to modern gas boilers because of the disruption the work would cause, or concerns over the safety of gas particularly amongst the older generation.

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

N/A

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

Significant work is already undertaken within Renfrewshire Council level at raising the awareness of energy efficiency for our new and existing tenants. A range of information is on offer to our tenants from energy performance certificates, energy booklets and packs to a home energy visit from an energy advisor if requested.

At a national level the Scottish Government could look at directly funding energy advisors, specifically for social housing, to operate at a local council level. This could be done through local authorities themselves or the energy advice centres.

**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.**

The policy should benefit all groups.

**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.**

As above the policy should benefit all groups.

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

'Smart' Meters provided by utility companies so that tenants can monitor real time usage and associated costs.

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

Helpful      ✓

We believe that the case studies are helpful and well intended, however do not reflect the realities on the ground when dealing with the individual energy characteristics of properties.

We agree that NHER/RdSAP 9.91 is the only viable tool to be used to calculate both the Environmental Impact (EI) and Energy Efficiency rating of a property (EE) within EESSH.

However, it should be noted that this software takes into account a number of elements that are not included within the case studies or the outline standard itself. These elements include the size, height and floor space that is required to be heated, as well as the perimeter of the property, where heat is being lost, cubic space and heat loss perimeter respectively. We feel that these components are equally important to the elements that have been included within the current case studies, and can significantly vary the performance of a building.

We accept that in order to create such a sophisticated matrix would create numerous case studies, be too specific and in turn unhelpful.

Our response would be that these “case studies” highlight the difficulties, and potential dangers, of adopting a uniform standard for generic property types such as “Four in a block” or “Top Floor Flat” without taking into account significant variances/variables within diverse stock. These variances/variables within properties could be so significant that as such we feel that if not reflected in the targets could undermine the future standard.

**If you think they are helpful:**

**Question 8 (a): Are these the right range of dwelling types to be represented as case studies?**      No    ✓

At the highest level the dwellings that have been presented within case studies do represent the broad range of properties that most social landlords would recognise to constitute their generic stock.

However, as highlighted, for the purposes of energy modelling a more sophisticated matrix would have to be developed at an individual council level in order to provide both strategic and practical solutions to meeting EESSH for property types. The variances within our stock require the council to look at literally dozens of solutions for what has been defined as a generic Mid Storey Flat (Gas) due to a range of differences on the external/internal size of the property, construction methods, materials, type and age, all of which contribute/impact to the energy rating of the property.

**Question 8 (b): Are there any other types (including hard to treat) that you would like to be included as a case study?**      Yes ✓

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

There are a range of non traditional design types that have not been highlighted, and that are significant in number to provide a challenge to social landlords in meeting EESSH. Whilst these types of properties will differ from area to area there are a number of general types that should be included at a national level.

These properties provide a significant challenge to meeting any future standard through the complexities/difficulties around using thermal insulation, either internal or external.

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

We agree that any new standard should be based on individual property performance, and should use NHER/RdSAP 9.91. This is the only viable tool that can be used to calculate both the Environmental Impact (EI) and Energy Efficiency (EE) rating at a property level within EESSH.

As social landlords are required to produce Energy Performance Certificates at present and collect energy data on our properties, then we see this as a fair and accurate way of reporting on a future energy standard.

**Question 10: Do the 'Baseline: 1990 Measures' accurately reflect the energy efficiency performance of dwellings at that time?**

Yes ✓

**If not, please provide details.**

Whilst it is difficult to evaluate whether the 1990 baseline is a completely accurate representation of energy efficiency for all properties at that time there is no other viable alternative to use as a baseline.

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

Yes  No

This question has to be answered on a property by property basis. We broadly agree that the range of measures suggested would be those that we would take into consideration when identifying improvements. However, those measures would have to be assessed for technical feasibility, practicality and cost effectiveness.

**Internal & External Insulation**

For example whilst internal insulation may be practical within some properties it will not be in others due to the internal floor space and layout that would need to be changed to accommodate it. In addition external insulation may well be feasible for some flats but not possible due to owner occupiers, position on the street etc.

**Solar Hot Water and PV**

These technologies are sensitive to orientation and over shading and may not be financially viable or technically feasible dependent on the location of the property.

In summary whether these measures are “realistic or feasible” will vary from property to property and require the council to look at properties at an individual archetype basis. The Council is committed to, and has a programme in place, providing modern, efficient, gas condensing boilers to all of our properties, as well as double glazing through both our SHQS and Capital Programme.

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

We accept that every measure has a role within specific property types.

**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?**

None.

**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?**

No

**If not, please explain why.**

We believe that adopting an environmental impact target could run contrary to what social landlords are currently trying to achieve within/through their SHQS works and Capital Programmes.

Whilst we fully support trying to reduce carbon emissions we believe that using the EI rating to measure the performance of our properties may conflict with what is the most affordable heating solution for some tenants.

This is highlighted in the proposed standard which will reduce the existing SHQS standard for electrically heated detached houses and bungalows from 60 down to 55 RdSAP points.

Therefore from a consistency perspective we would strongly advocate continuing to assess properties on the primary Energy Efficiency or EE rating with Environmental Impact as the secondary rating.

**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 further comment.



**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?**

No

**If yes, please explain why.**

Renfrewshire Council has prioritised an Asset Management Strategy over the last few years in order to improve our understanding of the stock and its condition and to develop a strategic understanding of stock and deliver an SHQS investment programme.

The strategy included carrying out a detailed Stock Condition Survey which collected energy characteristics for use in the production of Energy Performance Certificates (EPCs), as well as the acquisition of an Asset Management Database which stores those characteristics and has the ability to model energy ratings at a variety of levels, from area down to house type.

We have also developed an archetype for our properties that is used for energy modelling; this allows the council to identify potential “systemic” problems within our stock.

In addition around 1,000 energy surveys are carried out on void properties each year which continue to update the information we have for our stock.

**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

We believe that what is being proposed will be more than challenging, if not very difficult, for a proportion of our stock to meet without significant investment in renewable technology, over and above what is being spent through either SHQS or our capital programmes.

**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 ✓

The natural progression of EESSH should be to build on and improve those energy ratings within the SHQS. By decreasing this we feel it could disincentivise social landlords from improving electric heating for their tenants.

Renfrewshire Council has 350 houses/bungalows that currently use electric storage heating, and which we have plans in place to renew with modern gas condensing boilers.

We would suggest that this category is redefined to separate out those properties that are using electric for heating and off gas network, as opposed to those that are using electricity but could be connected to gas.

This would allow a fairer rating for rural properties whilst at the same time incentivising urban social landlords to continue with their existing gas installation programmes.

**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 believe that there should be a move towards heating socially rented properties with renewable technologies however we would stop short of committing to 2030 as a deadline for a number of reasons.

The public sector has the opportunity lead the way in the implementation, experience and development of domestic heating technologies; such as ground and air source, solar hot water and photovoltaics through the scale and demographic of our customer base.

A move to renewable technology would provide both a means of reducing carbon emissions, whilst at the same time reducing the running costs of heating a home to tenants in turn providing a whole house approach/solution to heating our stock/properties.

The further benefits are that a cheaper way of heating the house allows the tenant the use of rooms that they may not heat, or use, during the winter months whilst at the same time limiting issue that social landlords face over dampness and condensation that occur when rooms are not used and unheated. For these reasons we therefore believe that moving towards renewable heating for our properties is a natural progression as a social landlord.

However, at present local authorities are under significant financial pressure to achieve value for money within their capital programme and or SHQS programmes. Renewable technologies are simply not an affordable option where competing with the gas infrastructure. Indeed, even with grant funding the price differential between a modern gas condensing boiler and Air/Ground source heat can still be in excess of 100% more expensive than gas.

Until this price differential becomes comparable or more aligned with traditional gas or electric installations then 2030 is not a viable date.

**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

**If yes, please explain which option you prefer and why.**

See question 20 - we believe that social landlords should have the ability to broaden the “hard to treat” category by being able to include properties that they can identify will fail EESSH by 10 RdSAP/NHER points.

**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 that any new standard should be per property based rather than aggregated. An aggregated approach carries the risk of social landlords concealing properties that are energy inefficient and potentially not fit for purpose.

However, we do not believe that this should be based on an Environmental Impact rating rather an Energy Efficiency rating. Furthermore, and as highlighted previously, we do not believe that there should be a uniform target for all property types; such as four in a block or mid storey flat.

The new standard requires a much more sophisticated approach to measuring the performance of dwellings, and has to take into account more information that will be used within NHER/RdSAP 9.91 calculations than the uniform ratings for house/flat type as set out in the consultation document.

**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 ✓

We welcome the opportunity to identify hard to heat, or non traditional properties, within our stock and apply 1990 baseline in order to identify what measures can be implemented to meet the 42% carbon reductions target.

However, we believe that social landlords should be given the option of identifying their own “hard to treat” stock and that this should be defined by a criteria.

Our opinion is that the criteria “hard to treat” should be broadened to include those properties that social landlords can substantiate are failing EESSH by more than 10 NHER/RdSAP. This 10 point failing would take into account all SHQS works being implemented, and all necessary energy improvements being made including double glazing, loft and cavity wall insulation, condensing boilers (where on the gas network) and 100% energy efficient lighting.

Where all of these measures have been undertaken and the property continues to fail by 10 points then we would request that they are classified as “hard to treat” and that the 1990 baseline and subsequent 42% reduction can be used.

**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 ✓

**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?**

N/A

**Question 21: Do you think that there should be exceptions to the proposed energy efficiency standard? If so, how should they be treated?**

Yes ✓

As a local authority we have a legacy housing stock which spans building and investment period of over one hundred years; varying significantly in style, type, design and quality.

Our initial EESH modelling has highlighted that some of the most popular stock (and those classed as traditional build) may be the most difficult to bring up to the new standard; such as semi detached and terraced housing.

In addition a significant proportion of our stock has been sold under the Right to Buy and subsequently many of our existing properties and blocks have owner interest within or adjacent; making EESH investment and or demolition very difficult even with Green Deal / ECO funding.

We would also highlight that the statutory powers such as the Tenement Scotland Act only grants the authority power to make necessary repairs and maintenance and not improvements of which the majority of measures within EESH would fall under/into.

As in our response to question 20 we would advocate classing those properties that fail the new standard by more than 10 points as hard to heat and therefore allow us the ability to use the reduction of 42% against the 1990 baseline figures.

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

As noted in previous statements the availability of new funding streams such as 'Green Deal' and 'ECO' could provide social landlords with significant funding provided that they can be integrated with investment programmes, particularly in multi tenure blocks.

**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.**

No

We believe that the measures that required in meeting EESSH, for a significant proportion of our stock, are significantly over and above our current investment rules/programmes/principles and those required within SHQS.

Our initial analysis/modelling has shown that to meet EESSH around one thousand of properties will require a combination of thermal insulation, external and internal, as well as renewable energy such as ground source, air source, solar hot water and or photovoltaic's to meet EESSH by 2020.

None of these technologies have been considered to date within our investment plan to meet the Scottish Housing Quality Standard, which is at an advanced stage of delivery. If variations could be introduced, they would contribute a significant amount of additional investment over and above what is currently budgeted for, or required under SHQS.

Taking into account maximum grant funding opportunities, through Green Deal/ECO, in our view renewable technology will still not be financially viable over the next five years; or up to 2020 under the current financial climate.

**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 and encourage any initiatives from partners and suppliers, along with Scottish Government support, that contributes to the advancement of gender equality within the construction industry.

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

It is imperative that social landlords utilise and employ asset management tools that can provide accurate financial costings and projections in relation to EESSH, along appropriately skilled staff.

**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

We support the view that the SHR should be tasked with monitoring the implementation of the new standard.

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

Yes

There will be additional IT and monitoring costs associated with delivery of EESSH.

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

Yes

We would suggest 10 year milestones to meet 2050 but that those milestones are defined prior to 2020 being implemented in order to allow future financial planning over a 30 year life cycle.

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

No

We believe that most social landlords should be in a position to model and identify their stock compliance against EESSH through the work on the SHQS to date. The ability to long term financially plan beyond 2020 will be important to many councils and housing associations in meeting initial EESSH targets.

**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.**

None that we are aware of at present. However as a Local Authority we are committed equal opportunities and will incorporate equalities assessments within the development of our EESSH strategy.