

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.

No comment

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?

N/A

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

N/A

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

N/A

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

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

Comments

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

At para 4.12 it is proposed that there will be a duty on social landlords to encourage tenants to reduce their energy efficiency. It is made clear that this is envisaged as being a continuous process. RSHA is committed to

improving tenant awareness and capacity in respect of energy efficiency. We previously ran an Energy Advice Project for our tenants in conjunction with EST – funded through Wider Role Grant. We are now trying to mainstream improved advice to tenants. We are training up our staff and developing new systems for ensuring consistent advice is provided and monitoring against these.

From our experience we would agree that a sustained information and advice programme is required to help many tenants actually change their behaviour – with benefits for both their fuel costs and reduced carbon emissions. It should be noted however that this will require a very significant and ongoing input of resources which is unlikely to be met, on the scale required, through other existing advice providers in the area. The Association receives no on-going subsidy towards this and covers this cost through the rents of tenants as a whole – and yet some of the benefits are societal. This is currently a matter of choice for the Association. Making this a standard and ongoing requirement, without any form of subsidy to social landlords, would, we feel, have a significant impact across the sector. Careful consideration should be given in advance of this proposal being implemented. Due regard should be given to the nature and scope of the advice envisaged, to help ensure a quality and meaningful process and to avoid landlords re-inventing the wheel. It should also be ensured that opportunities for co-ordination of local advice provision, and the funding of this, are explored. Much emphasis is being put on the role of social landlords generally within this paper, and the thought occurs there is scope for bodies like ourselves to use the expertise developed to provide advice services to the population at large.

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

As long as they cover all scenarios and are well grounded

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?

What RdSAP version are these energy efficient and environmental impact ratings based on? There will need to be a conversion factor for properties which have already had EPC's carried out using previous versions of RdSAP. If no conversion factors are available then all previous EPC's will have to be re done. EPC's are changing as of the beginning of October 2012 version RdSAP 9.91.

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.

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 process of obtaining EPCs for every home will certainly be a resource intensive one. Note also the comment at question 9 about evolving versions of SAP and the potential implications for having to re-run EPCs even where they currently exist.

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?

Yes it should apply – not clear whether it is practicable.

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?

At this point in time it seems likely that a substantial proportion – if not most - of the cost of upgrading our stock to meet the new standard will have to come from rental income – see below.

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

Only a handful of the Association's homes fail the current SHQS energy efficiency standard – and these are in the process of being addressed. We have no exemptions. We estimate however that to achieve the new standard by 2020 we will need to invest up to £1.5m that we would not have previously had to, in order to achieve compliance. This contradicts the assumption outlined in section 1.3 of the document that "*the proposed ratings are achievable without significant additional investment beyond the SHQS.*"

After some initial investigation work (based on existing knowledge and a sample of desk top EPCs across our stock) it seems likely that the new proposals will require the Association, which has a large proportion of its 520 houses (nearly all built within the last 20 years) in off gas areas, to upgrade approximately 20% of its houses. The majority of this 20% is due to the new proposed Environmental Impact ratings. Investigations suggest that the Association would have to install ground source (cost £17,000) or air source heat pumps (cost £10,000).

The majority of this cost would have to be funded directly by the Association. Other funding sources which are supposedly due out soon such as the Renewable Heating Incentive (RHI) and the Green Deal cannot be relied upon to help fund the cost of upgrading the houses as the Government has already postponed the RHI (domestic) on several occasions and given no proper steer on funding levels and also have yet to confirm if air source heat pumps would be eligible. Similarly with the Green Deal, it cannot be relied upon for funding even although it is likely to go live in October 2012, it is unlikely to be applicable to the type of work that the Associations houses require i.e. heat pumps, PV's etc as the cost of these types of works would be ruled out under the restrictions of the 'Golden Rule' in the Green Deal guidance.

As result we believe that the bulk of this cost will need to be self-funded – with significant implications for our Business plan – adding pressure to increase rents at a time of financial hardship for many tenants and reducing our capacity to continue to fund the provision of new affordable homes.

It is often argued that tenants should pay more to help fund improvements to their homes. One difficulty with this however is that the resulting benefit to tenants is often uncertain and impossible to predict. It will depend on the household composition and circumstances, including the extent to which the person(s) are in the home, and their relative fuel use. This makes it extremely difficult to be able to provide clear information to tenants about likely savings that might help justify a rent increase (and in this regard some clearly researched evidence about varying benefits would be extremely helpful).

Our experience also suggests that with technologies still often relatively new the process of retro-fitting new systems can be complicated and can be somewhat variable in terms of the effectiveness of the installation. Again. More independent and centralised advice would be helpful in this respect.

As a result of these uncertainties and the limits of affordability , it is likely that any rent increase on the home in question is likely to only represent a modest proportion of the overall cost of installation – meaning the balance of the cost having to be met by the Association’s overall income stream.

This Association is very positive about trying to improve energy efficiency for reasons of combatting both fuel poverty and climate change. However there is at least an argument that the scale of the net cost that we are facing is disproportionate - particularly given that much of it will be triggered by the need to meet the carbon emissions , rather than energy savings, targets. It is noted that the societal benefits of significantly reducing carbon emissions are to be borne by the social housing sector whilst better off householders in other sectors are not being faced with the same demands.



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

Best placed to gather information about the sector and to ensure no duplication of the Regulatory role.

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