

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?

The majority of our exemptions relate to kitchen facilities: safe working arrangements or adequate food storage space, currently 142 properties. These are traditional pre 1919 tenemental properties which will continue to require exemptions as it is not considered economical or desirable to reconfigure the size of the kitchen by taking space from another room in what are usually small flats to begin with.

In addition we will also have a limited number of temporary exemptions were we have had tenant refusals.

In tenemental stock with no cavity which we believe is a n/a rather than an exemption.

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

We have had some projects that involved mixed tenure estates and whilst it can be challenging, to date we have been able to find solutions through good communication and other flexible solutions. Although dependent on the nature of the improvement works this could prove to be more challenging in the future.

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

In the main our solutions have been flexible and project specific, although in all cases it has involved good communication with the tenants and owners but in some cases has proved very labour intensive and has incurred the Association an additional cost.

We also hold open days and residents meeting when appropriate, which can prove very effective.

In one project several years ago we were looking to undertake a variety of

improvements, including external works which required participation of owners (17 owners out of 42 Properties). We were able to get participation through extensive communication, explaining the advantages of the improvement works and offering the owners flexibility in payment, i.e. we allowed owners to pay up the costs over time.

On another occasion when replacing electric heating with a gas heating system, which required a new gas mains installation, we couldn't, despite best efforts, get all owners to grant permission for the gas governor to be located on common ground. Due to the Titles Deeds it required owners consent to do this, as a result of not being able to sign all the owners up the project was stalled for several months, however, we were able to purchase a small piece of ground at minimal cost to allow the works to proceed. But all this took a long time and incurred internal costs, additional legal fees and the cost of the additional land.

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

Evidence would suggest it 's not always the case with the increasing number of refusals we are seeing particularly in regard to improved, more energy efficient heating systems.

For other tenants it can be very important to reduce fuel poverty or where they see the property as a long term housing solution for them.

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?

Good energy efficiency advice, we have had good experience using companies like GHEAT to provide advice to our tenants. It would be helpful if case study evidence was more specific to the individual circumstances of the household. Perhaps the use of smart in home displays to allow households to make informed decisions about their energy use.

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.

Potentially the elderly and disabled households. Some of the systems we are installing are becoming more and more complex and difficult for people

to understand how to best use them efficiently and effectively.

Communication is key to ensuring some of our more vulnerable tenants are able to use the systems efficiently but also improve comfort levels. It is important to factor in return visits and demonstrations several weeks after the initial demonstration, which allows any issues to be raised and answered. As technology has improved it would also allow us to record a demonstration of the new system with a frequently asked questions section, which could be put on DVD and issued allowing tenants to refer to it over time. Also use our website to have demonstrations for particular estates and systems, again allowing tenants to refer to at their leisure.

There may also be a requirement for day care for some tenants who have particular disabilities and they are required to vacate their home during the day to allow the works to commence. This is something we have used on occasion.

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.

This could be the case if someone was going from a partial heating system to a full heating system, which would improve comfort levels but may incur them in additional energy consumption and also additional rental charge for the improvement, which could result in an increased financial burden.

Owner occupiers in mixed tenure estates could also have an undue financial burden. The provision of grants similar to the old Housing Action Area grants would improve take up.

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

Better understanding of the different energy tariffs and pre payment meters not been penalised. Energy advice teams that offer quality advice ensuring bills are reduced but comfort levels are maintained or improved. Publicising good quality information through case studies.

Use of in house displays to allow households to monitor and understand their energy consumption linked to good quality energy advice to reduce bills.

Energy Audits being offered to households every few years.

However all these measures require either resource or resource and cost.

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

Helpful Unhelpful

Helpful but require to be in a user friendly style, pictures and diagrams to help explain in addition to text would be helpful.

Show worst case in all examples and where possible individualise case studies to the household, allow through web based approach for a household to load their statistics, house type etc and understand their energy consumption and what measures they could take to reduce costs but maintain comfort levels.

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

Yes in the main with a few exceptions, multi stories, non traditional construction. Detached and bungalow properties. Pre 1919 mid and end terrace properties.

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?

Bungalows more likely to be occupied by the elderly or disabled which in many cases are more likely to be on fixed incomes and may be more disadvantaged.

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

It would appear to make sense to continue using SAP/RdSAP for regulating energy performance, there have however been problems in the past as it didn't always recognise some newer systems i.e. thermaflows. However we understand this is being addressed in the updated version in October, in future it will be important that SAP/RdSAP keep pace with new heating systems, otherwise landlords may be forced not to install the most efficient systems simply because they aren't recognised by SAP.

It also means that an EPC will be required for every property to show compliance with the standards. There is a cost to this - firstly to get a current position to ascertain what actions are required (it is unlikely Associations will have EPCs for all properties) and then on completion of works to show compliance. Our Association currently undertakes the EPC assessments in house at a cost of approximately £30 per survey, The cost could be as high as £50,000.

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

Further measures - they may be technically feasible but not necessarily realistic within the time period noted.

Advanced measures for solid wall properties - are (technically) feasible. However this puts a financial strain on landlords with pre 1919 tenements like ourselves. Many of our tenemental properties were refurbished in the 1980s and early 1990s and would require upgrades to the insulation. The costs noted within the document for these measures is £5k. We assume this cost is to retro fit insulation to walls internally.

If we assume the £5K for retrofit (at today's costs) this would cost the Association up to £4.0 million to achieve. Unless the situation changes we will not be blessed with access to grants as others landlords with properties with cavities have through CERT and CESP. The work is also much more invasive for residents unless decanting is considered which would be cost prohibitive.

We appreciate that Blown/injected insulation within the lath and plaster 'cavity' is a potential future option but we believe has still to be accepted as a standard insulation model. We would need to understand how this model deals with:

- window reveals when the stonework is not generally as thick and therefore there is the potential for moisture bridging.
- existing electric installations.
- poor lath and plaster install etc.

Finally whilst we would not argue against other landlords receiving grant (we believe that this type of work should be incentivised) it seems the more problematic properties have not had access to the same grant funding opportunities. This is set against a climate where the energy standards 'bar' is potentially to be raised and Welfare Reform will put further financial pressure on landlords. Those Associations with more traditional stock will be amongst the most affected if new standards are to be applied.

Essentially the fairness of approach that the SG is suggesting where *'all landlords will be expected to make an equivalent contribution relevant to their stock'* (6.6) is not reflected in fairness of grant availability and tenant disruption due to the interventions which will be required to meet 2050

standards in particular

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

See above re insulation unless there is the potential to access grants rather than loans.

In addition, zone controls for the heating systems in flatted properties, one and two bedroom flatted properties are in most cases too small to really benefit from this measure.

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.

We are not sure about the use of EI. We believe it is more likely that tenants will understand the energy efficiency (EE) rating. EI is more related to what the Government is trying to achieve in CO reductions rather than what tenants are more likely to be interested in, which is cost of heating and improved energy efficiency. In addition the EE application has been used for SHQS so continuing to use the same rating methodology would allow a consistent approach.

We have strong reservations about the level of the standards themselves and the suggestion that these will be enforceable in law (this is different to SHQS) . We would seek clarification that if the standards are not met by 2020 the SG will not be suggesting that properties cannot be let.

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

We understand the principle underlying the suggestion however the practicalities are significant.

Given the broad range of house types and heating options across our stock we would need to assess against a significant number of energy standards.

Looking at EI only will still require a significant level of interrogation which will be amplified if cross checking is required against EE. We would suggest that if the standards are to be applied either EI or EE is selected - not both.

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.

However, it will incur considerable cost and resource would be required to put in place EPCs for all our stock, we currently only hold this information for approximately a third of our stock. Although we use in house assessors this still requires resource and a cost of approximately £30 per EPC.

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?

The SAP system is based on energy costs and (where they can) RSLs are switching from electric to mains gas because they will obtain a better SAP rating, the running costs for tenants are lower and there is grant available to fuel switch.

There is currently the irony that RSLs are fuel switching for the above reasons but the Government's objective is to move to electricity as the main fuel source (whether it be generated by plant, wind or water).

Inevitably as gas prices increase (as they will as a finite resource) electricity

will become the cheaper fuel and there is the possibility that many RSLs who received grant to switch to gas will switch back in the future either to offer lower running costs to tenants and/or to meet future energy standards.

We believe that the longer term view should be being considered now. Acceptance that SAP ratings might be lower to date if electricity is used as the fuel source - but that in future this position will change. There should also be grant incentives to remain with electricity rather than grant being tied to a fuel switch to gas/oil or poorly rated gas boilers.

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.

We believe that the ratings are too high. The proposed ratings in (gas heated properties) are some 25-30% above the SHQS requirement which is between 48 and 50 (depending on the SAP model used). For example our recent new builds (with GCH) which were completed in 2010 and 2011(2007 Regs.) all have EI/EE ratings of between 82-86 and for mid floor flats - only marginally over the new standard.

See also answers to Q.23 and Q11.

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?

If applied, we would agree with the argument put forward for individual homes, particularly when trying to eradicate fuel poverty. However there are financial costs associated with this.

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?

We would suggest there is a tolerance level set for hard to treat properties.

We don't have sufficient information to fully comment but recognise the need for improvement and should be linked to cost of solution and affordability.

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

There will be some situations where it is not economical to achieve the standard. Landlords will have asset management plans and investment plans which are unlikely to include investment to achieve the new standard, and some may not have the financial capacity to cope with the additional burden. It may therefore be sensible to afford a longer time period for these properties to comply.

There may also be refusals on the grounds of ill health and vulnerability to be able to cope with the proposed improvement, as there are currently under SHQS. Would temporary exemptions be considered on these grounds?

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

Not aware of any further sources over and above those contained in the consultation document. We would however comment that the process for obtaining funding is often very complicated and not conducive for high uptake of grant, in addition the qualifying criteria is very often prohibitive to achieving the government's aim of reducing carbon levels across social housing, surely grant should be available across all Social Housing areas not just some.

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

The financial assistance to landlords in the longer term is unknown, however some of the current schemes are not accessible to many

landlords, for various types of work or the location of the stock attracts no grant, even though the tenants may be equally as disadvantaged, in similar levels of fuel poverty and have the same social housing landlord.

At this time it isn't possible to know what the true cost associated with achieving the standard is, one because we don't know what the standard is, and two, until a full assessment of our housing stock in terms of compliance with a standard has been completed, the costs are unknown. Even once a compliance exercise has been carried out, the costs will depend on which measures are most appropriate for each property. Through time technology will improve and further options may become apparent, which may affect the cost positively or negatively.

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.

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

No

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

It would seem sensible to continue with the one regulatory body.

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

Yes No

As landlords carry out energy improvements they will be required to re-assess the energy rating of the buildings concerned, and re-assess when EPCs reach expiry date. Both of which incur a cost

Staff time in continued monitoring.

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

Yes No

We would suggest every 10 years from 2020.

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.

No