

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 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 landlord I am employed by has had all its stock improved and meets current SHQS. However, if you increase the SAP ratings required then this could cause problems especially for mid and top floor flats as the new proposed ratings are too high as they can cause fully rehabilitated flats with Cavity wall insulation and A rated condensing heating system and double glazing to fail. The ratings proposed really need to be revisited as they will cause good properties in our sector to fail. Having looked at EPCs for our stock I have analyses 23 mid floor flats and 13 of these would fail the proposed C80 EI rating, with 4 of them being below C75. Of the 14 top floor flats, 3 would fall below the proposed C70. I have analysed these properties and think that the failure is related to length of exposure and perhaps area, both matters that cannot be altered. The incremental rise in flat ratings is too high and should be adjusted so that ground floor flats = 65 (although this may need to be lower for ground floor gable end flats – what is the difference between a ground floor gable end flat and a lower 4 in a block property?), top floor flats at 5 points higher at 70 (again gable end flats will have more exposure and therefore need rating adjusted – what is the difference between and top floor gable end flat and an upper four in the block property?), and mid floor flats 5 points higher at 75 (again gable end flats will have more exposure and therefore need rating adjusted). The discrepancy and failure position is similar for the proposed EE ratings. Altering the proposed ratings to take account of actual circumstances such as exposure etc. would negate the need for future exemptions.

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

Owner occupiers and private landlords do not have the means and/or desire to carry out improvements when it costs them money. Many owners bought through right to buy and live on the margins and do not have available funds for such works. Similarly, private landlords are a profit driven business and do not want to carry out works which have little short term return.

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

In my experience priorities for tenants are day to day repairs, rent levels and planned works such as kitchen and bathroom replacements, however, this may be because we have good properties.

Tenants are interested in having reduced utility bills but through reduced costs from suppliers as their homes are already improved.

Tenants also do not want their landlords telling them how to live in their homes with regards to their energy use. It is important for landlords to offer advice but they are not there to "educate" tenants – this terminology is demeaning to tenants.

We currently work with energy advice companies (Utility Aid, SOLAS, GHEAT, EST) to provide advice and assistance to tenants and this has helped some reduce bills by changing tariff etc. – none of the work shows any need for work to our properties.

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?

Many tenants are aware of energy efficiency. It is unfair to concentrate your efforts on social sector tenants and make them feel that they are the problem or that they need "special" treatment to understand about energy efficiency and be penalised due to the sector they live in. Statistically, housing only equates to 27% of energy in Scotland and social rented housing only equates 23.8% of this 27%, therefore only a very small proportion of the overall energy picture – 6.4% of energy. What about the other 76.2% of housing, which must have a greater energy impact given the poor standard of housing in the owner occupied and private rented sector? Surely, as a country we, and as a Government you, should be concentrating efforts to improve the owner occupied and private rented sector where the greatest benefits can be achieved.

You should not be picking out social rented tenants as being in need of increased awareness or special efforts. If you are serious about the matter you should be having national programmes to increase EVERYONES awareness and determining standards that apply to everyone equally

regardless of tenure.

By advising that the Government will not do anything with owner occupiers or the private rented sector before 2015, the Government is penalising the social rented sector unfairly and is losing an opportunity that will be interpreted as politically motivated in that there will be an independence vote in 2014 and that the government will not want to create discontent with 76.2% of the housing electorate.

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.

Yes. Social rented sector tenants will be unfairly subject to proposals. If further improvements have to be made to properties simply to meet an inaccurate (please see answer to question2 for details) notional target set by the government then tenants will need to pay for this through their rents. If properties have already had a lot of work to make them warm and more energy efficient but they still fail the proposed rating then the cost of doing work to improve further will come from rental income which tenants pay. ECO will not cover all areas of expenditure and tenants will therefore have to pay. Therefore people, who live in a sector with proportionally the best quality housing in Scotland, will have to pay more to try to improve the housing further, while all other tenures (who have the greatest environmental impact) are not impacted – this is clearly inequitable.

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.

Yes – households living in the social rented sector. A reduction in the proposed EPC standards ratings (as highlighted at the answer to question2) would be the most beneficial way to minimise the burden. This would allow good properties to pass and therefore allow efforts to be concentrated on poorer stock and resources to be used to give advice on how residents of Scotland can try and reduce energy use and environmental impact by how they live, for example, car usage, wasteful energy usage in the home (full kettles etc.).

Some properties will not be able to have cost efficient measures carried out to make them meet the standards proposed and money and energy would be wasted trying to achieve the proposed inaccurate notional ratings. One of your case studies illustrates this well - the studies give a 1992 -98 electric flat and advise that to meet the 2020 target then this flat will require new post 2003 double glazing, new fan storage heating, and new immersion. However, if the property was built 1997/98 then it will only be 22 years old at 2020 and it would not be cost or energy efficient to replace the double glazing, indeed it would be inefficient as it completely ignores the imbedded energy of the original fittings – how can it be efficient to replace windows that are only 22 years old? Additionally, there would be no ECO or grants to replace such windows so tenants would need to pay for this through rents.

Many properties in our sector do not meet the existing SHQS SAP standard, so increasing these further will only worsen matters. This failure has led to some landlords disposing of stock purely because it does not meet a notional SAP rating – surely this cannot be right? If a property is good quality and houses someone in housing need one day, how can it be unsuitable a day later simply because it fails a rating? The property then just goes into the private rented sector or owner occupied sector and has no further improvement and no advice given to those who then reside in the property.

Bring the other 76.2% of the countries housing up to the existing 2015 SHQS before making higher targets. This would have a much greater impact on energy and affect the vast majority of our population and therefore have a much greater impact. By doing this you would also end the problem where tenants in the social rented sector cannot have their homes improved because the owner occupied or private rented properties attached prevent the required work being undertaken.

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

National roll out of smart meters would be the best way to let everyone better understand their energy use and therefore manage their consumption – this is not just restricted to tenants. This would also allow the Government to analyse accurate real data about the energy consumption of our nation. The Scottish Government should also have public education campaigns to raise awareness and start education early in schools. Citizens need to have information and advice regardless of the tenure they live in. Tenants are not a special group of people who need special advice.

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

Helpful Unhelpful

Not accurate or detailed enough in types of properties. The case studies use unrealistic floor areas and ignores differences in size, length of exposure, where exposure etc. (for example, flats not differentiated when a gable end, which obviously has more exposure and should have a different rating goal) – all things that can affect the EPC rating achieved. The results given for Now are not what I find when carrying out EPCs and using RdSAP software so therefore I am not convinced that they are accurate and that the measures proposed will achieve what is stated.

The case studies are split by some ages and types but quite limited, although it is appreciated that this will inevitably be the case when trying to generate universal case studies. However, basic things have to be included, such as recognising the difference between a mid-terrace flat and gable end flat EPC ratings achievable. Also, what is the difference between a lower four in a block property and a ground floor gable end flat? Likewise,

what is the difference between an upper four in a block property and a top floor gable end flat?

In the case studies there are no age bandings for 4 in Block properties when obviously there will be differences just as there are for other property types based on age.

What about property types aged 1964 – 1976?

What about property types post 2007?

As well as a lack of accurate types the proposed standards to be achieved are not split by age even although this will have an effect on the rating achieved. Trying to have the same rating for stock types regardless of age will result in a catch all average rating position where properties that should have higher ratings (current new build) will be allowed to achieve a lower rating than they should and older, but sound and efficient properties may fail due to a lower achievable rating.

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

Not accurate or detailed enough in types of properties. The case studies use unrealistic floor areas and ignores differences in size, length of exposure, where exposure etc. (for example, flats not differentiated when a gable end, which obviously has more exposure and should have a different rating goal) – all things that can affect the EPC rating achieved. The results given for Now are not what I find when carrying out EPCs and using RdSAP software so therefore I am not convinced that they are accurate and that the measures proposed will achieve what is stated.

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As well as a lack of accurate types the proposed standards to be achieved are not split by age even although this will have an effect on the rating achieved. Trying to have the same rating for stock types regardless of age will result in a catch all average rating position where properties that should have higher ratings (current new build) will be allowed to achieve a lower rating than they should and older, but sound and efficient properties may fail due to a lower achievable rating.

It is not helpful to the aims of the EES to try to make the types so simplistic. Proper account needs to be taken of real differences across and within stock types, such as property location (gable end exposure etc).

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?

Age bandings for 4 in block properties.

Age banding for property types aged 1964 – 1976

Age banding for property types aged post 2007.

Recognise the difference between a mid-terrace flat and gable end flat EPC ratings achievable. Recognise similarities of a lower four in a block property and a ground floor gable end flat and an upper four in a block property and a top floor gable end flat.

Proposed system should include age bandings, with differential proposed ratings, as the new standard.

The existing proposed property types are too simplistic.

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

RdSAP is good as it is easily understood and already used widely in the sector. Government needs to decide which rating it wishes to use EE or EI, depending on what it is actually trying to achieve with the EESSH. If it is really about carbon reduction targets then it is the environmental impact rating that is important. Also EE rating is so inaccurate in terms of costs to occupants that it is largely ignored – there is so much more than property characteristics that affect utility running costs.

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 1990 baseline figures are based on a lot of assumptions, which in many cases are inaccurate. For example, your case studies give a post war mid floor flat that at 1990 had full central heating (60% efficient) and a gas room heater, however, my employers stock (and that of many other RSLs at that time) did not have full central heating systems or fires and instead most of these properties were still heated by coal in 1990. Therefore the % change in the impact of the measure we have carried out will be much greater than the model assumes.

There are also questions regarding the accuracy of examples. The example

of a mid floor flat given on page 32 illustrates this well as it is unlikely that such a flat would only require cavity fill from its 1990 position in order to comply with SHQS 2015. The 1990 baseline figures assume stock to be better than it actually was in 1990. It is also very unlikely that the addition of double glazing and new heating system would enable property to meet 2020 target – the sector has many mid floor flats that will fail this 2020 target, so either the example must be inaccurate or there is a problem with RdSAP software – this should be a priority for the Scottish Government to resolve.

Again, what is the difference between a lower four in a block property and a ground floor gable end flat? Likewise, what is the difference between an upper four in a block property and a top floor gable end flat?

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

Yes No

Unfortunately many of the measures are neither realistic, feasible nor cost or energy efficient to undertake. For example, the studies give a 1992 -98 electric flat and advise that to meet the 2020 target then this flat will require new post 2003 double glazing, new fan storage heating, and new immersion. However, if the property was built 1997/98 then it will only be 22 years old at 2020 and it would not be cost nor energy efficient to carry out these measures, indeed it would be inefficient as it completely ignores the imbedded energy costs of the original fittings – how can it be efficient to replace windows that are only 22 years old? Additionally, there would be no ECO or grants to replace such windows so tenants would need to pay for this through rents.

Also the position of the flat could affect this in that a ground or top floor flat may meet its required rating but a mid floor flat does not (due to too high a rating requirement) – would you only replace the glazing in the mid floor? It is not efficient to replace elements earlier than their life span or to start replacing ad hoc simply to meet an inaccurate averaged rating requirement.

Similarly, the case studies give a 1999 – 2007 electric flat and advise that to meet the 2020 target then this flat will require new fan storage heating, new heating controls and new immersion. However, if the property was built 2006/07 then it will only be 13 years old at 2020 and it would not be cost or energy efficient to carry out these measures, indeed it would be inefficient as it completely ignores the imbedded energy of the original fittings.

Additionally, there would be no ECO or grants to replace such fittings so tenants would need to pay for this through rents.

The case studies appear to ignore the fact that properties are occupied. Many of the case studies show that, in addition to other measures, floor insulation would be required to bring properties to the standard, however, the disruption and upheaval to occupants of installing floor insulation is ignored as is the actual capacity under flooring to take insulation. Even assuming that there was space under the floor board to add some insulation and that the floors could all be easily lifted to allow this, the assumed cost is greatly underestimated as the cost of the works would be added to with the

cost of replacing tenants flooring that has been disrupted during the process. The cost also ignores the cost of actually trying to get tenants to agree to allow such work to be undertaken.

Solar PV systems are costly and will only be efficient in reducing energy if occupants of a property are at home during daylight hours to use the power generated. Therefore they are not realistic to achieve the energy saving intended in the case studies.

Meanwhile the owner occupied and private rented sectors need do nothing – so obviously unfair and ineffective.

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

Please refer to the answer to question 10 for examples.

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?

The inclusion of the owner occupied and private rented sector.

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 EI is a good indicator but the main dwelling types should be broken down further into age bands to be more realistic about what can be achieved by which dates. Also need to recognise the difference between a mid-terrace flat and gable end flat EPC ratings achievable, and recognise similarities of a lower four in a block property and a ground floor gable end flat and an upper four in a block property and a top floor gable end flat.

Please see previous answers (especially to questions 9, 10 and 11) for more clarification.

Also, because the EESSH is restricted to social rented homes it reduces the ability of social landlords to have their properties meet the standard where their stock is in mixed tenure blocks.

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

Scottish Government needs to be clear about what it wants to achieve with EESSH, it will not always be possible to improve the EI rating without reducing current EE rating – what is more important for the government? Also EE rating is so inaccurate in terms of costs to occupants that it is largely irrelevant and ignored.

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 case studies are inaccurate and give higher RdSAP ratings than can be achieved for some stock, especially mid and top floor flats, including those with double glazing, cavity fill, efficient gas heating systems, 100% LEL.

Having looked at EPCs for our stock I have analysed 23 mid floor flats and 13 of these would fail the proposed C80 EI rating, with 4 of them being below C75 and having no identified measures to increase the rating to C80. Of the 14 top floor flats, 3 would fall below the proposed C70, again with no identified measures to increase the rating to C70. I have analysed these properties and think that the failure is related to length of exposure and perhaps area, both matters that cannot be altered. The incremental rise in flat ratings is too high and should be adjusted so that ground floor flats = 65 (although this may need to be lower for ground floor gable end flats – what is the difference between a ground floor gable end flat and a lower 4 in a block property?), top floor flats at 5 points higher at 70 (again gable end flats will have more exposure and therefore need rating adjusted – what is the difference between and top floor gable end flat and an upper four in the block property?), and mid floor flats 5 points higher at 75 (again gable end flats will have more exposure and therefore need rating adjusted). The discrepancy and failure position is similar for the proposed EE ratings. Altering the proposed ratings to take account of actual circumstances such as exposure etc. would negate the need for future exemptions.

When RdSAP software was last upgraded it resulted in reduced ratings for properties, so a mid floor flat property put through the software now will have a lower rating than when it was put through the software about 2 years ago and will therefore be less likely to meet to a C80 target, without there being any improvements that can be cost efficiently made.

Again, what is the difference between a lower four in a block property and a ground floor gable end flat? Likewise, what is the difference between an upper four in a block property and a top floor gable end flat?

My employer has good details regarding its stock. The Scottish Government needs to clarify that cloning of results across identical stock will be allowed in order to make 100% records feasible and affordable to achieve.

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

For the reasons given above in previous answers. It will be difficult for some RSLs to meet these targets for all their stock.

A much better challenge would be to export the challenges to the owner occupied and private rented sector to achieve any realistic environmental impact and to ensure that you treat all Scotland's housing stock and occupants equitably and fairly.

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

The targets set have to be realistic, especially in off gas areas.

The SHQS and energy targets are much more undermined by restricting the targets to the social rented sector. A much better challenge would be to export the challenges to the owner occupied and private rented sector to achieve any realistic environmental impact and to ensure that you treat all Scotland's housing stock and occupants equitably and fairly.

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

This should only be considered if it would apply to all housing stock regardless of tenure at the same time. Not sure how practical it would be to achieve by any 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 No

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

Establish a 'set of measures' is an alternative.

This system could identify practical measures that should be set as a minimum standard to improve properties (where appropriate), including things such as 'fuel switch' from electric to gas where possible and suitable to occupant; install an appropriately sized gas condensing combination boiler and system, controlled by trvs, a seven day programmer, and a room stat or a modern day efficient electric system; insulate the walls (internally, externally, or cavity fill) and top up the insulation in the attic to a minimum depth of 250mm; fit (post 2003) double glazing (at a suitable replacement date); and fit low energy bulbs throughout the property (which will probably be the only type available by 2020).

These are practical measures that RSLs should be undertaking as a matter of course, but in essence, there is little else that can be done to improve the energy efficiency of properties without substantial redevelopment.

There is a distinct possibility that emerging technologies will significantly enhance energy efficiency, but until these are readily available (and affordable), the measures outlined above would be a good standard to strive for. Again, however, this must also apply to the owner occupied and private landlord sector if any real impact is to be made.

However, if not going to look at alternatives then at least the dwelling types and proposed ratings need to be reconsidered.

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?

Should apply to individual homes, but should allow cloning of data for types of properties. We should be measuring the EI of the stock we own, but not how the occupant decides to live in it. For example, when we provide a home we do so with 100% LEL and explain benefits to occupants but this is usually quite quickly changed by the occupant – something that a landlord cannot control.

However, because the EESSH is restricted to social rented homes it reduces the ability of social landlords to have their properties meet the standard where their stock is in mixed tenure blocks. If the obligation of the standard applied to all housing stock regardless of tenure, this could be dealt with and social rented sector tenants would not be penalised due to living in a block with non social sector owners.

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

Do not have enough detailed knowledge of this to provide an answer.

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?

Do not have enough detailed knowledge of this to provide an answer.

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

The standard will require to be realistic and this is the case in respect of exemptions. The standard cannot be met for many properties due to the Scottish Governments failure to apply the standard to all housing stock in Scotland regardless of tenure. As the EESSH is restricted to social rented homes it reduces the ability of social landlords to have their properties meet the standard where their stock is in mixed tenure blocks. If the obligation of the standard applied to all housing stock regardless of tenure, this could be dealt with and social rented sector tenants would not be penalised due to living in a block with non social sector owners.

Additionally, tenants may refuse to allow the necessary work to be undertaken in their home. To deal with this the Scottish Government would need to enable quick recourse for landlords to have Courts issue orders enforcing tenant to allow the work to be undertaken.

There will also be stock which cannot be brought to the ratings proposed. As explained previously, having looked at EPCs for our stock I have analysed 23 mid floor flats and 13 of these would fail the proposed C80 EI rating, with 4 of them being below C75 and having no identified measures to increase the rating to C80. Of the 14 top floor flats, 3 would fall below the proposed C70, again with no identified measures to increase the rating to C70. I have analysed these properties and think that the failure is related to length of exposure and perhaps area, both matters that cannot be altered. The incremental rise in flat ratings is too high and should be adjusted so that ground floor flats = 65 (although this may need to be lower for ground

floor gable end flats – what is the difference between a ground floor gable end flat and a lower 4 in a block property?), top floor flats at 5 points higher at 70 (again gable end flats will have more exposure and therefore need rating adjusted – what is the difference between and top floor gable end flat and an upper four in the block property?), and mid floor flats 5 points higher at 75 (again gable end flats will have more exposure and therefore need rating adjusted). The discrepancy and failure position is similar for the proposed EE ratings.

Altering the proposed ratings to take account of actual circumstances such as exposure etc. would negate the need for future exemptions.

Many properties in our sector do not meet the existing SHQS SAP standard, so increasing these further will only worsen matters. This failure has led to some landlords disposing of stock purely because it does not meet a notional SAP rating – surely this cannot be right? If a property is good quality and houses someone in housing need one day, how can it be unsuitable a day later simply because it fails a rating? The property then just goes into the private rented sector or owner occupied sector and has no further improvement and no advice given to those who then reside in the property. We do not want to lose more stock at a time of affordable housing shortage.

Exceptions would need to be dealt with on a case by case basis.

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

None of which I am aware but this issue of funding and its impact on costs to tenants needs to be looked at in much more detail. The funding that takes the form of a loan will have to be paid for by tenants through increased rents; therefore this does not assist the aim of dealing with fuel poverty as it simply transfers the cost for reducing energy bill to rent charges.

Funding in the form of grants is largely restricted to the poorest quality stock that has little previous investment, therefore landlords who have invested in their stock are penalised as they do not receive grants. For example, landlords may have previously replaced old G rated boilers to standard efficiency combi boilers at their own cost to assist tenants, whereas, those who did not can now claim grant money and replace their old boilers to higher efficiency combi boilers. The landlord who used their own resources to change from G rated to standard efficiency will now need to use more of their own resources to change again to higher efficiency – neither a cost nor embedded energy efficient process.

Green deal should be restricted to the owners of stock and not the tenants of the homes as they can agree on measure that future tenants will need to pay for without choice.

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

Previous examples given above should clearly show this:

Many of the measures required to meet the standard are neither realistic, feasible nor cost or energy efficient to undertake. For example, the studies give a 1992 -98 electric flat and advise that to meet the 2020 target then this flat will require new post 2003 double glazing, new fan storage heating, and new immersion. However, if the property was built 1997/98 then it will only be 22 years old at 2020 and it would not be cost or energy efficient to carry out these measures, indeed it would be inefficient as it completely ignores the imbedded energy of the original fittings – how can it be efficient to replace windows that are only 22 years old? Additionally, there would be no ECO or grants to replace such windows so tenants would need to pay for this through rents.

Similarly, the case studies give a 1999 – 2007 electric flat and advise that to meet the 2020 target then this flat will require new fan storage heating, new heating controls and new immersion. However, if the property was built 2006/07 then it will only be 13 years old at 2020 and it would not be cost or energy efficient to carry out these measures, indeed it would be inefficient as it completely ignores the imbedded energy of the original fittings.

Additionally, there would be no ECO or grants to replace such fittings so tenants would need to pay for this through rents.

Many of the case studies show that, in addition to other measures, floor insulation would be required to bring properties to the standard, however, the disruption and upheaval to occupants of installing floor insulation is ignored as is the actual capacity under flooring to take insulation. Even assuming that there was space under the floor board to add some insulation and that the floors could all be easily lifted to allow this, the assumed cost is greatly underestimated as the cost of the works would be added to with the cost of replacing tenants flooring that has been disrupted during the process. The cost also ignores the cost of actually trying to get tenants to agree to allow such work to be undertaken.

Solar PV systems are costly and will only be efficient in reducing energy if occupants of a property are at home during daylight hours to use the power generated. Therefore they are not realistic to achieve the energy saving intended in the case studies.

The sources of funding are not available for many of these examples and costs would require to be met from tenants rents.

Meanwhile the owner occupied and private rented sectors need do nothing – so obviously unfair and ineffective.

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.

No view, but need to be careful not to create hostility through positive discrimination.

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

HEED would be the most logical and could be developed to capture all data required.

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

The SHR monitors the SHQS and reports on this, however, they are not a technical body and it is not clear how their system could manage this. If the energy standard is intended to eventually cover all stock, regardless of tenure, then a better system would be to further develop HEED.

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

Yes No

There are the costs in surveying properties and producing EPCs to see if they meet the standard. I assume that the cost of £30 (quoted in item 8.10 of the consultation document) relates to the cost of outsourcing 'en masse' survey and provision of EPCs, and not 'one offs'. Our experience is that the cost of outsourcing 'one offs' is substantially higher than £30. Savings can be made through cloning but it needs to be clarified that cloning will be permitted. It is my experience that the in house cost of surveying and provision of 'one off' EPCs is also more than £30. There are savings to be made by carrying out EPCs 'in house', but I do not think that these savings are as substantial as implied in item 8.11, and should be recognised accordingly.

More costs associated with set up and organising of works to meet standard. Most costs associated with resources (staff time, IT systems etc) required to record, update and monitor against standard. More costs associated with resources required to advise tenants on changes and impacts etc.

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

Yes No

In order to monitor progress to 2050, we first of all need to accurately know what 2050 actually means in detail for our sector. The Scottish Government needs to clarify this in great detail. Five or ten yearly intervals will allow progress to be monitored whilst allowing new technologies to be taken advantage of as they become available and hopefully more affordable.

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

Yes No

It could be wasteful determining and undertaking measures to meet and surpass 2020 targets, only to find out that they will not be sufficient for the 2050 target. We need to know now what we are aiming for for 2050.

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.

Yes – there is a great inequality by restricting the EES to the social rented sector. If this standard applied across tenure then it would be more equal and not divide people or their living requirements based solely on their tenure.

A much better challenge would be to export the challenges to the owner occupied and private rented sector to treat all Scotland's housing stock and occupants equitably and fairly.