

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 Hillcrest HA, Kingdom HA, Perthshire

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?

Comments Construction type and private owners

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

Comments Difficult in gaining 100% consent

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

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?

Comments

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 None that immediately springs to mind

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

Comments Simple to operate heating controls and education

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

Helpful Unhelpful ✓

Comments No Construction type is not typical of our problematic stock

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 No

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 solid stone/no-fines/granite built where external insulation is impractical – flats in particular, in mixed tenure. Even more so in off gas areas

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

Comments no views at present

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 To broad and vague to enable proper baseline

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

Yes No

Comments What are the "further measures"?

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.

Comments Unsure at the moment

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

Comments

Question 14: In assessing your stock against the proposal for a new standard for social housing, do you foresee any significant challenges in obtaining individual property details across your stock?

Yes No

If yes, please explain why.

Comments Properties currently with low energy ratings, that have solid wall construction, stone or no-fines concrete and no prospect of external insulated cladding. This is particularly problematic in mixed tenure situations and areas that are off gas or have no immediately available gas supply. Internal insulation is expensive disruptive and for smaller properties losing floor space may not be feasible. Challenge of cost and feasibility.

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 Yes. The proposal identifies different flat and property locations within blocks of flats/terraces/detached scenarios. However, it does not differentiate between construction types. For example, there's a huge difference between a mid-floor traditional build home and a solid no-fines or stone build flat. These are genuine hard to treat and heat properties that deserve specific identification. Construction types rather than focusing on a property's location is far more important.

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 Makes it more complicated and harder to manage.

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 Need to look at individual property types and locations. Many recent new build developments have been built with very high insulation standards and require very little heating at all. Older harder to treat and heat require a different approach.

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 Unsure at present

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?

Comments Unsure at present

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 not sure what "unusual dwellings" constitutes.

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 As above

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 Unsure at present

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

Comments Funding sources are complicated, bureaucratic and time barred making it difficult for RSL's to correlate with their own improvement programmes.

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

Comments Depends on property types and locations

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 No comment

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

Comments No comment

Question 26: Would you welcome the Scottish Housing Regulator (SHR) monitoring the proposed standard both in the interim period and longer-term or would you prefer an alternative body to carry out this role? If so, who and how?

Yes No

Comments No comment

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

Yes No

Comments Unclear at present

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

Yes No

Comments Yes – to early to set dates.

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

Yes No

Comments Yes

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 No comment