

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.

Ardenglen has worked extensively to upgrade all properties to high efficiency gas boilers. We are working with an external partner to develop a community owned wind turbine project and will become partners in the subsequent energy production company which will be formed to sell energy from the turbines.

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?

None

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

We have been able to upgrade without significant costs to owners.

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

As in 3 above

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

It will be for some tenants, however for properties already achieving a high energy efficiency standard it won't be the case. The views of owner occupiers need to also be considered in multi tenure blocks. It is important that the costs associated with upgrading are not simply recovered through increased rents. This would simply be substituting fuel poverty for something else.

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

These are broadly the right benefits; however the responsibility for educating people about energy efficiency should not be the sole responsibility of landlords. Unless we are providing fuel with rent why should it be?

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.

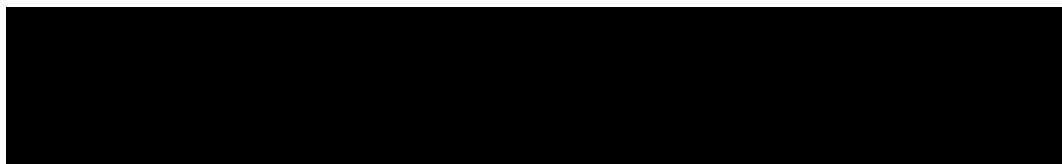
This policy may result in increased rent levels, and the increased rent may be more than potential savings through energy efficiency, so although the group that will be most affected by this are not an equality group, they will be the people who are just outside the housing benefit eligibility criteria.

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.

See comments at 5 above

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

- Legislation to remove the "stand by" button on electrical appliances? (estimated 6% of all household energy costs)
- Subsidise low energy light bulbs – in fact make them free then everyone will use them!
- Make energy consumption devices compulsory fitted by the energy companies as part of their domestic metering systems.



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

Helpful Unhelpful

The case studies will help understand the effect on energy efficiency rating that particular measures will have

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?

The document notes that further studies will be carried out. There are a number of non traditional construction types which have been used in Scotland. In particular there are large numbers of Wilson Block properties which have particular difficulties as regards insulation options. These should certainly be included.

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

It is important to understand that some landlords will have EPC and other energy assessments for all or most of their properties based on Rd SAP 2005, 2009 v9.0 and in future some on 2009 v9.91. Therefore it is crucial that the new standard sets out the minimum requirements using all 3 methods otherwise landlords will be unable to use existing data which has been produced at significant expense. Also, in assessing landlords current levels of pass and failure rates would now require additional survey work.

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 is based purely on assumptions and are inaccurate as many of the future measures are already in place in 1990

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

Yes No

Yes, however each RSL will need to assess the affordability, it needs to be realised that RSLs generally have only one source of income, this being rental income. The low energy lighting reductions are on paper easy to achieve, however in reality many tenants do not find this type of lighting desirable, landlords also have no control over the type of lighting used by tenants, this however could be controlled by the government through phasing out the sale of non LEL products, however like all energy saving products, there is a significant cost and therefore lengthy payback period.

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

See above

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.

Given that our remit is to provide services to our tenants, this measure is not easy to describe or understand, we feel that tenants would better relate to the Energy Efficiency rating as it can be quantified in potential cost savings.

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.

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

As noted we feel the energy efficiency rating should be used, however regardless of which rating, the ratings will be problematic in some instances, for example we have a significant number of tenement properties which have double glazing, external insulation, modern boilers and heating controls but still fail the proposed standards, the question would be, how could these be economically improved to meet the standard? We feel there needs to be an element of reasonableness built in terms of affordability to landlords.

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

By 2015 these properties should already achieve a higher standard, not sure why a lower standard would be proposed for 2020

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

Why only consider social rented dwellings?

What about private rented and owner occupied which represent the majority of stock in Scotland?

If energy efficiency requirements were made compulsory for these sectors either through regulation or through the ability to sell then real progress would be made?

The question in any case cannot be answered as it relates entirely to the Scottish/UK Government long term energy strategies.

These are at best fragmented and are currently nothing more than wish lists. There appears to be little coherent direction in this regard which will any case be driven by the market.

We may all wish our properties are heated by renewable energy but if this is not achievable within reasonable costs – it will simply not happen and why

in any case should social rented tenants be dictated as to their energy choices?

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 is important to focus on the properties that are in greatest need of improvement.

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

Whilst we agree with this, if adequate funding was provided for hard to heat homes, they could be brought up to the same standard as all other homes.

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?

The 42% target is an arbitrary reduction and bears no significance to housing properties, if this were the case it should be applied to industrial properties and transport and all other sectors. However in reality, nobody can really say what would be a reasonable reduction without knowing the cost and technical implications of trying to achieve such a target.

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

Clearly there will be some situations and some house types where it is not economical to achieve the standard without the demolition/rebuilding of the property. I would point out that landlords will already have asset management plans in place which cover the period up to 2020, and some may not have the financial capacity to cope with the burden of meeting a more challenging energy standard.

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

Comments

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, and in many cases where the scale is not large, the assistance is also not available at all. At this time it is not possible to know what the costs associated with achieving the standard are, 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 check has been carried out, the costs will depend on which measures are most appropriate for each individual property. Our concern here is that consultation is being carried out on what is an unknown quantity.

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

The SHR would be the obvious choice given that we report to them already on SHQS and other KPIs

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

Yes No

As landlords carry out energy efficiency improvements they will require to re-assess the energy rating of the buildings concerned, in many cases this will require the use of consultants and therefore will have a cost attached, it will also require the reproduction of EPCs once they reach their expiry date.

This cost should not be underestimated.

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

Yes No

The 2050 date is simply too far in the future to measure and is effectively an irrelevant timeline based on likely changes to energy production.

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