

**4. Please indicate which category best describes your organisation, if appropriate.**

**(Tick one only)**

<b>Executive Agencies and NDPBs</b>	<input type="checkbox"/>
<b>Local authority</b>	<input type="checkbox"/>
<b>Other statutory organisation</b>	<input type="checkbox"/>
<b>Registered Social Landlord</b>	<input checked="" type="checkbox"/>
<b>Representative body for private sector organisations</b>	<input type="checkbox"/>
<b>Representative body for third sector/equality organisations</b>	<input type="checkbox"/>
<b>Representative body for community organisations</b>	<input type="checkbox"/>
<b>Representative body for professionals</b>	<input type="checkbox"/>
<b>Private sector organisation</b>	<input type="checkbox"/>
<b>Third sector/equality organisation</b>	<input type="checkbox"/>
<b>Community group</b>	<input type="checkbox"/>
<b>Academic</b>	<input type="checkbox"/>
<b>Individual</b>	<input type="checkbox"/>
<b>Other – please state...</b>	<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?**

Mixed tenure – flatted property where owners are not prepared to participate in joint improvement schemes and landlords cannot afford to undertake work without the owner's financial contribution.  
Energy Efficiency – the SHQS exemption where there is no technically feasible solution that does not have disproportionate costs should remain.  
The new energy standard should not be imposed at any cost.

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

There are significant difficulties in improving property in mixed tenant property. Owners are often not willing or financially able to participate in improvement work. It is highly staff time intensive to work with owners to encourage them to participate in common works.

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

We offer a factoring service.  
We are working with our Local Authority to agree a 'protocol' to deal with common works. The Local Authority has participated in joint meetings, provided a modest private sector grant regime and in some case used their enforcement powers. These tools are only available when disrepair is being tackled.  
Improvement works such as energy efficiency would not be covered by this approach and therefore encouragement would be the only option.  
We have a small owners section that is dedicated to major common repairs and the associated owner engagement.

**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

As fuel prices have risen, the tenants interest in energy efficient heating has risen.

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

Tenants in fuel poverty will take 'comfort gains' from improved energy efficiency and not all improvements will lead to reduced consumption. Energy advice is an essential component of energy efficiency upgrades.

**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.**

**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.**

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

Energy advice and access to free smart meters

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

Helpful  Unhelpful

Comments

***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

One and half story houses are common in rural Scotland but do not seem to be reflected in the studies. Similarly solid fuel is still a common fuel source and it is not represented

**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 high exposure in some rural areas and in particular west coast islands means that cavity wall insulation may not be suitable. These should be dealt with as 'hard to treat'.

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

It is the current standard and any change would be costly.

**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.**

Cavity wall insulation – in hard to treat property

**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?**

ASHP

**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.**

It would be useful to retain a single energy rating. This system is too complex and difficult to apply.

**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

**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?**

Agreed

**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.**

Simplicity of application

**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

**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

Too complex – as above a single energy rating would be preferable.

**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

As the SHQS, the landlord should be able to notify exemptions. These would be on the grounds of 'not technically feasible', 'not cost effective' and 'tenant/owners non-consent'

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

**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

There are significant numbers of houses in remote rural locations that are not in the areas of multiple deprivation but are off the gas grid. However the ECO grants in the Green Deal are targeted at the SMIDs. Therefore there will be financial problems upgrading these properties due to the lack of funding options

**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?**

**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

SHR

**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