

**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

Social landlords have been at the front of addressing energy efficiency throughout the housing sector, leading the way and generally voluntarily improving conditions for residents due to their wider social responsibilities.

**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

The biggest hurdles are owner occupation making schemes difficult or impossible to get going and residents apathy not allowing access.

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

Comments

It is and always has been difficult to "improve" properties as most titles do not allow for improvements only repairs.

Improvements and pushing through change take an inordinate amount of time and effort translating to expense for the social landlord with owner apathy and inability to fund works.

There is little economic benefit for a private landlord to invest to make a property more energy efficient.

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

Comments

Spread payments, low interest or no interest loans, direct subsidy, indirect subsidy, advice and support, improvement funds.

**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

The main concern of residents is not that the house is energy efficient but that they can afford to heat it to a comfortable level. The use of energy is a national debate that is often of little interest to residents in their day to day life.

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

Comments although no to the question above the benefits are along the right lines

**Question 4(b): If no, why is this? How would you suggest we increase tenant awareness of the importance of energy efficiency?**

Comments

Significant ongoing structured energy advice and campaigns that are not short term funded to allow consistency of advice to be given by trained advisors who see it as a permanent career.

Place an obligation on the energy companies to give advice as part of their service delivery

**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 I think any policy that increases energy efficiency is good however the biggest problems remain in the private rented sector .

**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 The implementation of the standard will if not funded directly increase rents at a time where social housing rents will be under significant pressure from welfare reform. With the implication that generally the lower paid sections of society reside in social sector accommodation it may cause

undue hardship for those on low income or single parents who pay their rent. Social housing will become more marginalised as a sector.

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

Comments ensure that an obligation is placed on an energy company to automatically switch social tenants to their best rate

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

Helpful  Unhelpful

Comments

I think that the complication added for professionals working in the sector is too great, the sector has many associations and becoming an expert on all the options is an unrealistic ask for many landlords, especially at a time of great change in the social rented sector.

The system created is very confusing the principals and ideas need to be simplified greatly. The system proposed comes from the wrong angle. The system has been designed to achieve the policy outcome rather than make it simple to achieve. The burden of achieving the targets has been placed squarely on the sector to deal with.

If designing or putting in place a system for the private sector this would not even make it to a consultation phase. It is therefore inequitable and unfair.

**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 - many of the house types are effectively the same

Just too complicated

**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

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

Comments

As far as it goes RDSAP seems to be the easiest to work with none of which are simple or easy to access, all have a high cost in terms of staff time and effort, and increasingly more complicated each year.

What will be changed over next 30 years and will these modelling techniques need to be revised as well – some stability and a core standard government owned assessment method should be specified.

**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

We are dealing with averages here so by definition they can't be accurate. There are many concerns with and inaccuracies in the SHCS so I don't imagine the energy data would be that reliable.

**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.**

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

Is this to be a tool for national measurement of global targets etc or a tool for household energy efficiency?

What happens if you don't have get a good enough rating? Or the costs are too high?

We are dealing with housing and improving housing, that is efficiency not an impact based assessment.

**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

Its generally marginal the difference so why complicate it. Again this is an example of changing the goalposts during the game. Many organisations have only been recording the energy efficiency of their dwellings.

What benefit is there in changing the logic now? It only creates more administration and a change in mindset.

**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 not really – but will take some additional time

**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 Worrying about the how the details affect perception is a very minor issue. The main concepts are far more important.

**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 really don't understand the question

**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 I think it would be easier for all to say this is what all properties should have and a simple list of measures

**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 I think that an average would be better it would allow building managers to programme works and improvement programmes over a long term rather than trying to get measures installed in a piecemeal fashion.

**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 yes but again using averages to set targets for individual units is fairly random, I would also say that most unusual buildings were built long before 1990 so it depends on what was done during previous upgrades.

**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 if unusual buildings are by definition probably the unusual ones then they will be a small part of the target. They would then be more difficult to treat so an argument to have a lower target for these may be easier to comply with.

**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 unless you change other legislation many landlords will not be able to put in place the measures required in all cases. Its not appropriate that landlords are being held responsible in all cases.

**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

Comments you would have to define what is disproportionate – is that landlords staff time, consultants time, legal fees, works costs, long term maintenance and renewal costs? Impact of other legislation , cost benefit of previous improvements that are now deemed not good enough just 5 years after last target was set.

**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 Control of labour markets in the wider economy is probably not

in a housing associations gift. We would of course welcome greater employment opportunities for underrepresentation across the population.

**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

Comments I think that we are monitoring the standard then it should be national and that the SHCS should be used.

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

Yes  No

Comments Regulators ask for reports on a periodic basis and this has significant management costs. How do landlords monitor progress unless they do far more surveys. The surveys to date are meaningless as methodology will be changing. So all in all wasted resources.

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

Yes  No

Comments In reality legislation and priorities will change long before 2050. The only way to make sure a milestone is met is to make dates during the period with specific targets leading towards 2050.

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

Yes  No

Comments You must give property managers some certainty - we are not dealing with easily changed programmes and priorities. Fixed targets sooner rather than later will reduce waste and give more certainty. Social landlords are required to produce 30 year plans and submit these to the government.

**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