

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 BHA has piloted a number of renewable issues in recent years such as CHP, Biomass, ASHP and GSHP. We have also installed solar thermal and PV.

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 We are currently working towards finalising our stock info on energy efficiency. Current results identify that EPC software doesn't always recognise ASHP, GSHP and electric heating systems therefore despite using renewable energy this is still failing. Can the Scottish Gov assist in the software being updated or recognise that some renewable systems can only reach a reduced scale.

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

Comments We do not have high numbers of mixed tenures and have still to face this experience

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 Fuel poverty is still a major problem and not always the fault of the heating system or property. Rising costs will always cause difficulties no matter how energy efficient a property is.

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

Comments I would agree many of the benefits are correct. However if we are to be serious about tackling fuel efficiency and reducing carbon emissions more financial assistance is required. The cost of renewable systems etc are still considerable and impact greatly on budgets

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 Regular visits and advice sessions are required for numerous groups of tenants. However once again this is time consuming and resources are not available. LA's also liaise with RSL's in energy advice to tenants but the message is still not getting across that many can help themselves. This needs to be revisited and a new strategy developed.

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 Implementing the standard should not place undue financial burden on any group.

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

Comments More face to face advice sessions. Meeting smaller groups at awareness sessions. Showing potential costs savings that can be achieved by making small life changes. Bringing in groups from other areas that have 'done it'. Tenants are often more likely to listen to one of their peers who has experience in energy saving measures.

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

Helpful Unhelpful

Comments If 'sold' correctly to the tenants yes. They have to be relevant to individual/small group circumstances though

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?

Comments

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

Comments Very good tool until renewable initiatives are assessed

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.

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 Undecided

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 Assessing the condition of current cavity wall insulation would require careful consideration

**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 SHQS leads us towards gas as being the most cost effective and efficient energy. However the Govt leads us to reduce carbon emissions therefore renewable energy fuels. This is a contrast. Gas is projected to be the more expensive fuel within 10 years.

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 Depending on how you follow the standards yes. However previous answer means we have to consider having more properties on renewable sources than gas. Where do we go?

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?

Comments Yes to both questions

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

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 Although I have selected no it is difficult at this time to really answer this confidently. Further stock assessment and projections would be required here.

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 Answer much as above

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

Comments Not that I am aware of

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 I need to fully address this before being able to provide a definitive answer. We are trying to finalise our options for improving some properties.

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 I would welcome an advancement in the gender equality and can with correct training etc it can be achieved. My biggest concern has and will be is the basic difference between physical abilities and strength.

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 The SHR needs to be at the forefront of this

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 Every five years from 2020

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

Yes No

Comments This should be considered.

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