

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.

There are several examples of renewable energy projects carried out by Caledonia Housing Association throughout Dundee, Perth & Kinross, Highlands and Angus. These include for example;

- A gas fuelled CHP/district heating system in Kirkton Dundee serving 34 no properties
- A wood pellet Biomass system serving 32 in Inverness
- A wood chip Biomass system serving 20 in Forfar
- A number of Combined Heat and Power systems throughout Perth, Dundee, Angus and Fife serving approximately 175 properties
- Approx. 100 properties with Solar thermal throughout Perth, Dundee, Angus and Fife
- Approx. 60 properties with Photovoltaic cells throughout Perth & Kinross
- Approx. 135 with properties with air source heat pumps through-out Perth, Dundee, Angus and Fife.

We are also working with Scotia Gas Networks extending the gas network to 350 properties currently not on the gas network, carrying out fuel switching projects partially funded through CERT funding.

Caledonia Housing is also upgrading the thermal integrity of properties by insulation of lofts and infilling cavity walls where possible.

In addition we are providing face to face advice to households on heating and energy use to ensure that individual household needs are met to address fuel poverty.

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?

The greatest cause for SHQS exemptions is lack of owner participation in mixed tenure blocks. i.e. secure door entry systems.

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

The occupancy agreements with sharing owners allow us to upgrade properties to meet SHQS in most cases. However where the association is a minority owner in a mixed tenure block some owners are happy to participate in the projects but the majority decline.

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

No 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

Improving the energy efficiency of homes is a priority, as Tenants want a home that is warm, comfortable and affordable to heat. The dilemma is that it is the Association that has to meet the investment requirements for Tenants to benefit from the savings. Whilst this has to be supported it puts pressure on the Association's business plan.

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

Yes. Wider potential benefits include health benefits as tenants are not living in cold damp properties. Tenants will also benefit in other social aspects of life as they should not have to spend as much money heating their homes.

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

Providing meaningful energy advice that tenants understand would increase tenant awareness. Any tenant advice services need to be fully funded to ensure that staff are trained to identify differing needs and give the correct advice depending on circumstances. SCARF is a particular organisation that provides a valuable service for Tenants, and this approach should be commended and expanded to help Tenants reduce energy consumption and their fuel bills.

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.

Older people and people with learning difficulties may find it hard to learn to use new heating systems or understand new technologies and energy tariffs.
Also single tenants living alone in large hard to heat homes may be at a

significant risk, along with tenants in certain house types and locations due to the varying standards.

As previously stated the correct advice and support should be provided following the Installation of new heating systems and renewable technologies to ensure tenants are not over heating their homes and pushing up energy costs or alternatively not using their heating system at all.

Also a central website with easy use guides on how to use and control different types of heating systems would be very helpful.

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.

Meeting the standard will be funded through the associations capital investment programme, augmented by other external funding where available.

It may be a requirement to increase rents to fund the improvements. If this is the case then it will be borne by all tenants. Consequentially those on lower incomes are likely to pay a higher proportion of their income to fund the improvements. This may also have an impact on other non energy related improvements, which may have to be delayed as a result.

This burden can be minimised by continuing capital grants for improvements targeted at lower income and other disadvantaged households.

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

Helping tenants to understand how to use heating systems, along with providing tenant or house specific information on how to use energy more efficiently.

Funding for the installation of Smart meters should be explored. This will allow tenants to monitor their energy use more accurately and will encourage tenants to switch off electrical appliances when not in use.

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

Helpful Unhelpful

Case studies will help us understand the current performance of our stock, and set benchmarks for the future. However they are unlikely assist us demonstrate compliance with the standard, as we will have to provide actual data for our properties for this purpose.

All case studies need to be properly planned to allow the association to accurately assess, plan and manage our energy commitments. Too many

different case studies pilot projects may cause confusion and leave us with not knowing what the best solutions are to meet the standard.

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

The case studies cover the majority of social housing stock.

Where additional case studies are carried out it would be useful to make these available to share with other social landlords through the Scottish Government's website.

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?

Hard to heat timber framed properties, as the external wall construction limits the technical possibilities for improvement.

It would also be useful to have guidance on traditional build properties that have had thermal insulation upgrade works that have failed.

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

As SAP/RdSAP is the current methodology the association currently uses to monitor energy performance through EPC's it is absolutely essential that this methodology is used.

The biggest problem we have had is that the SAP rating methodology changes frequently, and conversions have been necessary to equate these to the version used to monitor SHQS compliance.

When the version of methodology is set for the EESSH, any future upgrades must include a comprehensive suite of conversion factors to easily take these back to the EESSH version.

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.

Overall the baseline figures are accurate.

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

Yes No

Yes if the introduction of new technologies and energy efficiency products become more readily available and cost effective over time. Meaning grant funding will allow for more energy efficient measures to be completed. Tenants also need to be educated in the use of the new technologies if the proposed measures are to be successful.

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

None. Any case study no matter how insignificant should be included.

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?

Our experience is that many new technologies require regular maintenance, and repair costs can be higher than normal. Associations need to take into account the longer term maintenance and replacement costs of all measures considered. Information on this would be extremely beneficial.

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.

Also all historical SHQS and energy efficiency information that has been gathered by RSLs and local authorities over the last 10 years has been based on the Energy Efficiency Rating and not Environmental Impact rating. EI rating has only been available through EPCs carried out on RdSAP 2005 onwards. All RSLs will therefore have to start from a completely new baseline.

This will be wasteful, time consuming and potentially very costly.

Whilst we understand the reasons for the SG wanting to consider using the EI rating, we would implore that the EE rating be used, so we can build on the work we've done in monitoring and meeting the SHQS.

In addition to this, Tenants are not concerned and often don't understand the Environmental Impact ratings. The EE ratings are much more meaningful for Tenants, who are more concerned about how much their

home costs to heat.

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

One problem with SHQS is the either/or option of NHER or SAP rating compliance. This makes monitoring of compliance more complex than it needs to be. One standard should be selected and stuck with.

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.

As the standards are changing, a new version of RdSAP is being used and there are more options for the different dwelling and heating types, we will almost certainly have to re-survey the vast majority of our properties.

Our databases will have to start from nearly scratch, as we build up data and evidence of compliance with the new standards.

This will be costly both in terms of staff time and resources and also the use of external consultants to do modelling on actual properties (even with case studies being available).

These costs will be even higher if we move to the EI rating instead of EE rating.

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

Especially for electrically heated properties in off gas areas where, depending on capital grant funding availability, it may not cost effective to bring them up to the required rating.

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

Although the energy efficiency rating is of a lower standard than other properties, there is more scope for improving these types of properties to get to the desired energy efficiency rating and environmental impact rating.

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

Gas is a fossil fuel and as such is not renewable, therefore unsustainable in the longer term. The longer term solution must be to harness as much energy from renewable sources as possible by 2030. Much of this will be distributed through the national grid, meaning that electric heating should be more sustainable by then.

Gas however is still the fuel of choice for the majority of the association's tenants, as it is affordable, and is a standard rate regardless of time of day of use. Providing the Scottish Government can ensure continuity of gas supply at a reasonable cost this will remain the case, however gas prices are likely to continue to increase and security of supply may be an issue in the future. These factors may increase costs to an unaffordable level, when tenants will chose other fuels.

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.

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?

The standard should apply to all properties or some people would continue to live in fuel poverty.

It would also mean that landlords and other owners could avoid committing to their obligation to improve their houses.

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

Certain houses types will inevitably require substantial investment to meet energy

efficiency standards. This may turn out to be disproportionately high. It is envisaged that there will not be a significant number of such properties. Simple life cycle costing methodologies could easily be applied to such properties to demonstrate where investment becomes disproportionate. Such properties should have at least carried out proportionate works, then be granted exemptions from going beyond that level.

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?

See above for proposed life cycle costing methodology instead of potentially complex percentage reductions.

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

In certain case properties will not meet the standard due listed building restrictions, owner occupiers' refusal to cooperate etc. Properties must be able to be excepted in such cases.

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

Section 3 of the document sets out the key sources of available funding for energy efficiency works.

The main problem is that there are a variety of relatively small funding sources, each available from different agencies or energy suppliers, and each applicable to different sets of circumstances. It really is a lottery applying for funding.

We have argued for years now for one single source of funding for energy efficiency works for social rented housing (and perhaps a single source for owned properties).

This will enable the funding to be targeted exactly to those who need it most, and will help the Scottish Government meet their targets much more easily.

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

Initial estimates prepared on our stock profile indicate that at least 700 properties will fail to meet the EESSH in 2015, even after we have complied with SHQS (20% of our stock).

This is largely due to the shift from EE to EI ratings. Where we have electric storage heating in off gas areas significant further investment will be required to achieve EI ratings when they would meet the EE ratings.

The cost of this could be substantial between now and 2020, as the amount of financial assistance available is small in comparison to the number of social rented properties in Scotland.

Many EESSH failing properties will have already been improved to meet the SHQS.

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.

By use of new (and local) energy efficiency modern apprentice schemes and encouraging female school leavers to explore career opportunities in energy efficiency industry.

There is an ideal opportunity as there is a three year (just) lead in to 2015 post SHQS.

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

Sharing information between local authorities and social landlords within geographical areas.

Open publication of currently gathered EPC information/certificates. Currently we produce EPCs in house using BRE software, however each EPC is generated in a vacuum, with no knowledge of what other surveyors are doing in the area.

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 Scottish Housing Regulator monitors SHQS compliance therefore it

makes sense they monitor the proposed standard. However the Scottish Government needs to set out absolutely at the outset what will happen if RSLs do not meet the new standard. This is required as the SHR will require RSLs to have a risk based approach to compliance depending on what the outcome of non-compliance will be.

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

Yes No

Due to the complexities of some of the technologies, and some of the contradictions between compliance with the standard and Tenants aspirations inevitably will require additional staff resource and training. It would be beneficial if training was funded and arranged by the Scottish Government to assist with this.

Software models have needed to be unbelievably complex or manually time consuming to monitor compliance with SHQS, both of which cost. The provision of a nice simple piece of software compatible with Excel or similar to monitor EESSH compliance would be extremely helpful.

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

Yes No

2020, 2030, 2035, 2040, and 2045. Plus yearly from 2035 if sufficient progress is not made by then.

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

Yes No

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.

Consideration should be given to tenants/occupiers and their energy usage within their properties – i.e. older single tenants in all day with high fuel bills and young single tenants working all day with low energy bills. Fuel poverty indicators would help with this.