

**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 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 checked="" 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.**

CES has three main clients spearheading Energy Efficiency: Edinburgh Council, Lochalsh and Skye Housing Association and Fife Council.

**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?**

Not applicable.

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

CES has had difficulty in this area.

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

CES has overcome certain blockers by engaging with the owner occupier, using scaffolding or access costs from UHIS to make the process as cost neutral as possible and engaging Surveyors/Supervisors with owners and landlords to win them over.

**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 social housing should be viewed as a priority for tenants during a time of high energy prices, particularly as the longer-term trend is for energy price rises to continue. As the consultation notes, though the overall standard of energy efficiency in the social housing sector is higher than for other housing tenures, many social housing residents are at a relatively high risk of fuel poverty due to a combination of low income and having a higher than average heating requirement.

The social housing sector has to a degree taken the lead on energy efficiency thus far, through delivery of area based programmes. It is vital

that the social housing sector continues to develop innovative energy efficiency solutions not only for the benefit of tenants, but to act as an exemplar for the private rented sector ahead of regulatory action in 2015.

Despite this, however, as energy efficiency measures often are not visible, and the improvements in terms of reduced costs and/or increased comfort are realised over time, rather than immediately, energy efficiency is arguably viewed as less of a priority by tenants than it should be.

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

CES broadly agrees with the benefits to tenants outlined in the consultation documents.

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

Please see response to question 7.

**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.**

CES has no comment.

**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.**

CES has no comment.

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

Whilst we agree with the financial and health benefits to tenants outlined in the consultation document, it is important to recognise that these benefits may not be fully realised by installation of measures alone. Housing providers and energy services companies will need to target specific groups of tenants, at community level, to provide advice and education on how to maximise the benefits of the technology. Involving tenants in the process as much as possible gives them a valuable stake in determining the outcomes they want to achieve from energy efficiency measures and will avoid improvements being seen as top-down programmes cause inconvenience, potentially reducing uptake

Tenants should be supported by easy access to education and advice, as opposed to a 'fit and forget' approach. This must be adopted in a coordinated, integrated manner, backed by Government and stakeholders with consideration given to wider demand reduction policy initiatives, such

as smart-metering. Tenants may become disengaged from energy saving behaviour if there is a confusing array of advice available on different products and services if information is not disseminated via coherent joined-up messages.

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

Helpful  Unhelpful

**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

**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?**

CES believes EWI and IWI with pilot's data available, Communal heating, ASHP and Solar Thermal would be more prominent case studies.

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

CES supports using the stated methodology for regulating energy performance in the social rented sector.

**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 SAP ratings have changed along with the thermal properties of some of the new energy measures which have increased. NHER and early SAP were the measures at the time.

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

Yes  No

[ ]

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

CES has no comment.

**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?**

CES believes Communal Heating should be the focus. ASHP's for eight flats at a time from one unit, along with Biomass, Ecopod, Solar Thermal with storage capacity and heat recovery. The NRP funding would help with extra capital costs.

**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.**

[ ]

**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.**

Not applicable.

**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?**

CES does not believe all social rented dwellings should be heated in this way. CES holds the view that an alternative source should be looked at.

**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.**

CES has no comment.

**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?**

CES agrees that the standard should apply to all individual homes rather than being aggregated across a landlord's stock. Aggregation could potentially lead to landlords focusing almost exclusively on easy to treat properties at the expense of the most inefficient homes that require most investment.

**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

**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

CES has no comment

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

The Scottish Government National Retro Fit Programme starts 1/04/13 to compliment the ECO £54m.

**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

CES agrees.

**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.**

CES has no comments.

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

CES has no comment.

**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

CES has no issues with the monitoring arrangements proposed in the consultation.

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

Yes  No

CES has no comment.

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

Yes  No

CES agrees that it is sensible to adopt regular milestones beyond 2020 and we agree with the dates proposed in the consultation.

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

Yes  No

CES agrees that more immediate progress should be reviewed before longer-term milestones are formally adopted.

**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.**

CES has no comment.