

**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.**

Clyde Valley HA have delivered External Wall Insulation with CESP funding.

In the past two years the business has invested a reasonable amount of time and resources into investigating the various new energy efficient technologies or funding streams. However, generally there have been considerable technical, legal and financial challenges which have prevented CVHA progressing with any of these past feasibility, this has included ASHP and Solar 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?**

Currently have no exemptions but will review after current Stock Condition Survey. Currently anticipating exemptions in off gas non traditional properties in rural areas.

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

For mixed tenure blocks is always difficult to deliver and this can be time consuming for staff to deliver.

There would appear to be a lack of appreciation from owner occupiers, particularly where they have acquired the property under RTB, that they now have shared responsibility for works to common elements.

Lack of Section 72 Scheme of Assistance funding from local authorities also a real draw back when trying to undertake repairs/improvement that incorporate owner occupiers.

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

No bespoke solutions.

**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

Without asking all tenants can not give a positive answer to this question. Anecdotally tenants do raise concerns about the cost of heating but this does not necessarily link through to a desire for improved energy efficiency, but I would suggest a reduction in fuel costs.

Tenant behavioural changes can be as important as the physical improvement of the housing stock to ensure that systems are used to the full. This also puts an onus on the landlord to provide good quality easy to use understand information at the outset, and potentially into the future.

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

Comments

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

Linkages to the reduction in direct fuel costs. The introduction of Smart meters would be a significant step.

**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.**

No.

**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.**

No.

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

Nothing to add.

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

Helpful  Unhelpful

Nothing to add.

**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

Social Housing incorporates a significant number of non-traditional construction types, consideration should be given to expanding the Case Studies to incorporate these. There should also be consideration given to multi storey block.

**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?**

Atholl Steel  
BISF  
Swedish Timber  
No Fines

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

The fact that there is a definite quantifiable standard should make this easier to deliver.

**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.**

Yes, in our opinion these are reasonable based on the technologies and available at that time.

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

Yes  No

From the details presented in future measures, we would see no immediate issue in their delivery.

However, Internal Insulation and Under Floor Insulation contained within the

Advance measure would likely prove a challenge. This would mainly be due to the level of disruption that would be encountered by the tenant and their reluctance to allow us to complete the works, as Landlords we currently struggle with many of the day to day improvements that we undertake. These measures really only lend themselves to properties where we have vacant possession.

There is a potential for high preliminary costs that would push these types of works into the unaffordable bracket, this would include decant costs, decoration allowance, etc.

Similarly, having previously completed a feasibility study on solar PV, it presented many challenges which meant that along with the initial capital outlay meant that business cases didn't stack up. These challenges include: impact on future roof works, lender implications, panel maintenance, panel efficiency, security concerns, final disposal costs, etc.

**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?**

Should consideration be given to modelling an electrically heated case study with an ASHP system?

**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.**

No comment to add.

**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

No comment to add.

**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.**

Will there be clarification regarding the cloning of the EPCs over similar house types, or is the expectation that landlords should now move to having 100% coverage for true EPCs. There will be a direct cost for obtaining the EPC for all stock.

**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

No comment to add.

**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

Off gas properties, particularly combined with non traditional house types will always be a challenge and the proposed new standard has taken this into account.

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

This would have no impact of Clyde Valley.

**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.**

No comment to add.

**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 individual homes, although information should be able to be cloned across house types.

**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

Seems like a logical approach assuming that the minimum CO2 is achievable at viable cost.

**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?**

This should be set based on what can be achieved against the cost of the works, might be too harsh to set a standard target for all in this category.

**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

Only where properties may be scheduled in a reasonable time frame for demolition or options appraisals are on going.

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

No comment to add.

**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

For the above statement to be positive or correct there would have to be a guarantee of funds being available and / or worked examples for each landlord.

As a general comment we would push for any Scottish or National funding packages to be well planned, tested and has clear qualifying criteria from the outset. Current/Previous funding packages have been over complicated and cumbersome to understand and have seen various changes during their life span. i.e. CESP/CERT

**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.**

No comment to add.

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

No comment to add.

**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 would be the most logical organisation to monitor this standard.

Although we would ask that the SHR have a good technical understanding of the standard and put appropriate measure in place, that are meaningful and allow for benchmarking between organisations.

Current SHQS reporting in the APSR is extremely time consuming and, cumbersome to calculate. A better tool/method of reporting should be considered.

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

Yes  No

Previous experience of SHQS APSR monitoring, was that the greatest cost was on overheads (staff time), so a concise meaningful questions set should also minimise any associated costs.

If full EPC data required, then this would be a significant cost for many landlord.

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

Yes  No

**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.**