

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.

Easthall Park has examined and produced a feasibility study the installation of solar PV to our housing. We have also installed two wind turbines to provide electricity to our community facility.

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?

Many landlords have challenges meeting the standards due to the requirement to get owner approval to proceed with insulation and rendering works as a large proportion of owner occupiers are unable to carry out the costs of improvements.

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

See point above, previous improvements to mixed tenure have been carried out with support of owner occupier grants.

It is anticipated that owner occupier grants will be crucial to carry out improvements to meet any new standard agreed.

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

See above

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

Our committee views this as important however given the majority of our stock is new build or improved few tenants have expressed this opinion.

We anticipate however as energy costs increase this will become more

important over time.

As highlighted in response above, it will also need to be a priority with owners to maximise potential benefits of a new standard.

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

Yes however we are concerned that a duty is being imposed on us for the responsibility of educating people about energy efficiency, whereas we would wish to assist in this process we do not believe that this should be our sole responsibility.

We would have concerns about how this duty is monitored and measured as any additional costs would have to be borne by our tenants.

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

There should be a sustained government publicity campaign undertaken with RSLs supporting this via their normal communication methods.

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.

Unless additional resources are made available to RSLs then this policy will result in increased rent levels, and the increased rent may impact more on people than the potential savings through energy efficiency.

We are concerned that if there is not adequate external funding to support necessary improvements that those already in fuel poverty will replace this with another form of poverty (rent poverty)

Recognition also needs to be given to groups that are currently in low paid employment and those currently on some form of housing benefit. We anticipate that the implications of Welfare Reform coupled with additional rent to meet the standard will impact greater on the above. (a concerning dichotomy of household incomes being reduced whilst increasing rent costs to meet new standard)

Funding for improvements will therefore have to be aimed at lower income homes and we are not convinced that Green Deal addresses this issue rather it just transfers debt from one sector to another.

We are particularly concerned that the Scottish Government view NRP as a fund for the private sector and that this will not be extended to the social rented sector. We believe that this is an example where our tenants are not being treated equally. The same principle applies in relation to domestic RHI in which DECC have stated (page 59 paragraph 173) Registered Social

Landlords installing individual renewable heat installations into each flat or house would not be eligible for the domestic RHI.

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.

See comments at 5 above

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

Early introduction of smart meters, sustained publicity campaign and further education with younger people (tenants of the future)

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

Helpful Unhelpful

The case studies will help understand the effect on energy efficiency rating that particular measures will have

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

No additional 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?

No additional comments

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

It is important to understand that some landlords will have EPC and other energy assessments for some of their properties based on Rd SAP 2005, 2009 v9.0 and in future some on 2009 v9.91.

Therefore it is crucial that the new standard sets out the minimum requirements using all 3 methods otherwise landlords will be unable to use existing data which has been produced.

Also, in assessing landlords current levels of pass and failure rates would now require additional survey work.

Some Landlords are highlighting that some property types previously assessed (Rd SAP 05) when they use the more current Rd SAP are seeing reduced ratings and concern is that the same will apply with the 2012 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.

The 1990 baseline is based purely on assumptions and will therefore be inaccurate.

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

Yes No

Yes, however each RSL will need to assess the affordability, it needs to be realised that RSLs generally have only one source of income, this being rental income. (Note earlier comments about replacing fuel poverty or debt to other sectors)

The low energy lighting reductions are on paper easy to achieve, however in reality many tenants do not find this type of lighting desirable. The government could control this by phasing out the sale of non LEL products.

Consideration needs to be given to the costs of improvements and the payback period.

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

Consideration needs to be given to the whole life carbon costs of any measures and whether the production of such exceeds the potential savings.

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?

No additional 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 We are unsure about this.

If not, please explain why.

We understand the need to measure carbon savings and therefore the reason for using the EI rating however it would be easier to explain to tenants the EE rating as we believe tenants will relate better to this as it can be quantified in potential cost savings.

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

Note comment above.

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.

Although technically feasible no consideration has been given to the costs of carrying out 100% EPC ratings. Consideration as to the costs of a revised EPC every time a new measure or improvement is carried out.

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

We anticipate that the ratings will be problematic in some instances, for example in some tenement properties which have double glazing, external insulation, modern boilers and heating controls some still fail the proposed standard. Consideration needs to be given as to how these can be economically improved to meet the standard? Who funds the work and the affordability to both landlords and tenants.

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

By 2015 these properties should already achieve a higher standard, not sure why a lower standard would be proposed for 2020

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

Not sure if this will be what all tenants want, practicality of such and the costs associated. There is also a concern that some renewables do not actually deliver without significant public subsidy and costs associated with this are transferred down the line from energy providers to consumers.

There is the potential that the fuel poor are further disadvantaged.

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 additional 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?

Yes, it is important to focus on the properties that are in greatest need of improvement. We would also like to see the standard apply to private rented stock.

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

Whilst we agree with this, we would like to see adequate funding being made available to deal with hard to heat homes so that they could be brought up to the same standard as all other homes.

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?

The 42% target is an arbitrary reduction and bears no significance to housing properties, if this were the case it should be applied to industrial properties and transport and all other sectors. However in reality, nobody can really say what would be a reasonable reduction without knowing the cost and technical implications of trying to achieve such a target.

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

Clearly there will be some situations where it is not economical to achieve the standard.

Some landlords will already have asset management plans in place which cover the period up to and beyond 2020, and some may not have the financial capacity to cope with the burden of meeting a more challenging energy standard.

As outlined earlier issue of owner consent will need to be addressed.

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

No additional 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

The financial assistance to landlords in the longer term is unknown, some of the current schemes are not accessible and some of the funding packages are actually loans which as outlined earlier only transfers the costs from one category to another.

We anticipate that although many landlords may feel that the proposed standard can be achieved the actual costs associated are unknown and only after full assessment of their stock will the real costs of compliance be known.

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.

Provide additional support and incentives to employers (qualifications, employment opportunities) for females who may wish to get involved in this industry.

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

No additional 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

No additional comments.

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

Yes No

As landlords carry out energy efficiency improvements they will require to re-assess the energy rating of the buildings concerned, in many cases this will require the use of consultants and therefore will have a cost attached, it will also require the reproduction of EPCs once they reach their expiry date.

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

Yes No

Regular updates required to allow RSLs to facilitate long term financial planning. Interval s of 5 – 10 years seem reasonable.

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

Yes No

See above.

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.

No additional comments