

4. Please indicate which category best describes your organisation, if appropriate.

(Tick one only)

Executive Agencies and NDPBs	<input type="checkbox"/>
Local authority	<input checked="" 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 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.

Fife Council attempt to have as many off-gas homes as possible to have some form of renewable heating. Currently they have 287 solar thermal and 40 heat pumps installed. Details available from Ian Dawson (Lead Officer – Sustainability) Tel: 08451 55 55 55 ext 444519, email: ian.dawson@fife.gov.uk

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?

Biggest issue we have is non access and then dealing with owners.

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

Dealing with owners is generally time consuming, staff intensive & often frustrating. Biggest hurdle is generally cost of improvement works especially cladding, limited grant availability.

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

Approach is getting better – clear procedures, dedicated officer dealing with owners, use of CESP & other funding initiatives to offset some of costs, use of standard securities where an owner finds it difficult to pay.

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

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

General concern at yet another 'duty' to be imposed on local authorities in a period when management & supervision costs being squeezed.

Greater emphasis needs to be placed on compilation of information packs when new systems installed that are readily available for future tenants.

Good idea to engage in general energy advice for staff.

Higher Energy Efficiency Standard will reduce the tenants heating costs and will increase the availability of disposable income.

Higher standard will create a reduced heating demand and may reduce the maintenance and repairs costs for landlords and potentially extend the life of heating systems.

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.

Yes, need to ensure information packs available in range of languages.

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, currently Fife Council are attempting to achieve the "Fife Standard" which is above the SHQS and should therefore allow a higher starting standard for our stock. However, this depends on the final standard being close to that being proposed in the consultation document.

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

Energy labelling of all appliances.

Additional education and information opportunities need to be taken where possible to make energy awareness common practice. We feel that face to face advice is the most effective form of engagement but are aware that it is the most resource intensive in terms of staff time and budget.

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

Helpful Unhelpful

Unclear whether the case studies cover non traditional stock e.g. Stuart Steel frame, which accounts for substantial number of dwellings. If these are not included then they should. Currently Non-traditional construction types can total more than 15% of a LAs stock. The list on page 19 of the consultation document I would suggest are a property style and not type, e.g. 10. Post war 1950 – 64 – mid terrace is a style of house whose construction type could be traditional cavity or any number of non-traditional types.

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?

SAP/RdSAP are nationally recognised and consistent indicators of energy efficiency. They have been used for years to support the recognised NHER and EPC scoring systems which are currently used by landlords. However, the implication of the revised version of RDSap due for Scotland in October 2012 needs to be assessed by a national forum to assess any technical changes.

Question 10: Do the 'Baseline: 1990 Measures' accurately reflect the energy efficiency performance of dwellings at that time?

Yes X 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?

Further measures can include A+ rated double glazed windows or triple glazed windows.

Solar thermal panels should be fitted were orientation and hot water system is compatible. This is particularly beneficial for larger households.

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

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.

We are currently in the process of undertaking a 100% stock survey.

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, given the level of investment by Fife Council we believe that we are well placed to achieve the new standard.

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

No, as the SHQS is a list of measures which should be achieved. However, greater use should be made of renewable technologies & subsidy to encourage higher standard.

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 the desired fuel source for Fife Council, However a concern would be one of tenant choice. Also, cost of getting infrastructure to more remote villages. In urban areas high costs may be problematic if wayleave issues result in awkward pipe routes and additional expense.

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?

Yes, although exemptions for owner occupier refusals and tenant access

issues may be required.

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

Yes, for tenant / owner occupier refusal and should require suitable evidence. At change of tenancy works should then be rectified. All tenants should be included where possible and continuing attempts should be made to engage with owner occupiers in a structured form.

Also, where measures are prohibitively expensive e.g. External Wall Insulation

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

Housing Revenue Account

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

Yes, the measures are reasonably achievable.

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.

Create a scheme similar to the "Disability equality" (double-tick) scheme that female applicants are given guaranteed interviews if they meet basic requirements for the post;

Introduce or pilot basic training courses or apprenticeship places targeted at female members of the community

Need an open and thorough change in attitude in the work environment by the current workforce

Ensure facilities for females are in place at work place eg toilets, changing rooms etc

Allow more flexible working - for example take into consideration that females are still the predominant member for childcare

Use more "female" faces in their recruiting marketing materials - eg look at the Police forces materials, the provision of positive female role models.

Companies to publicise their inclusive statement in their recruitment materials

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

Individual Stock Condition Surveys and property databases.

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

Yes, most appropriate body.

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

Yes No

Staff time and commitment and any potential monitoring systems developments.

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

Yes No

5 year cycle.

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

Yes No

Yes. Revisions should be considered due to technical developments in potential improvements.

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.

Marketing materials to include the "equality" panel - ie translated sentence regarding availability of other format

Monitor and analyse equality data for the uptake of any schemes

Outreach marketing to specific ethnic minority, disability etc organisations and networks