

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

**(Tick one only)**

<b>Executive Agencies and NDPBs</b>	<input type="checkbox"/>
<b>Local authority</b>	<input type="checkbox"/>
<b>Other statutory organisation</b>	<input type="checkbox"/>
<b>Registered Social Landlord</b>	<input checked="" type="checkbox"/>
<b>Representative body for private sector organisations</b>	<input type="checkbox"/>
<b>Representative body for third sector/equality organisations</b>	<input type="checkbox"/>
<b>Representative body for community organisations</b>	<input type="checkbox"/>
<b>Representative body for professionals</b>	<input type="checkbox"/>
<b>Private sector organisation</b>	<input type="checkbox"/>
<b>Third sector/equality organisation</b>	<input type="checkbox"/>
<b>Community group</b>	<input type="checkbox"/>
<b>Academic</b>	<input type="checkbox"/>
<b>Individual</b>	<input type="checkbox"/>
<b>Other – please state...</b>	<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.**

Comments

**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?**

Our stock has all been improved and meets current SHQS. However, if you increase the SAP ratings required then this could cause problems especially for mid and top floor flats as the new proposed ratings are too high as they can cause fully rehabilitated flats with Cavity wall insulation and A rated condensing heating system and double glazing to fail. The ratings proposed really need to be revisited as they will cause good properties in our sector to fail.

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

Owner occupiers and private landlords do not have the means or desire to carry out improvements when it costs them money.

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

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

Priorities for tenants are day to day repairs, rent levels and planned works such as kitchen and bathroom replacements.  
Tenants are interested in having reduced utility bills but through reduced costs from suppliers as their homes are already improved.  
Tenants also do not want their landlords telling them how to live in their homes with regards to their energy use. It is important for landlords to offer advice but they are not there to "educate" tenants – this terminology is

demeaning to tenants.

**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?**

Tenants are aware of energy efficiency. It is unfair to concentrate your efforts on social sector tenants and make them feel they are the problem or that they need "special" treatment. Housing only equates to 27% of energy of Scotland and social rented housing only equates 23.8% of this 27%, therefore only a very small proportion of the overall energy picture. What about the other 76.2% of housing, which must have a greater energy impact given the poor standard of housing in the owner occupied and private rented sector? Surely, you should be concentrating efforts to improve the owner occupied and private rented sector where the greatest benefits can be achieved.

You should not be picking out social rented tenants as being in need of increased awareness. If you are serious about the matter you should be having national programmes to increase EVERYONES awareness.

Not doing anything with owner occupiers or the private rented sector before 2015 is a lost opportunity and will be interpreted as politically motivated in that there will be an independence vote in 2014 and that the government will not want to create discontent with 76.2% of the housing electorate.

**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. If further improvements have to be made to properties to meet a notional target set by the government then tenants will need to pay for this through their rents. If properties have already had a lot of work to make them warm and more energy efficient but they still fail, say the notional EPC rating, then the cost of doing work to improve further will come from our rental income which our tenants pay. ECO will not cover all areas of expenditure and tenants therefore have to pay.

**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.**

Yes. A reduction in the proposed EPC standards ratings would be the most beneficial way to minimise the burden. Some properties will not be able to have cost efficient measures carried out to make them meet the standards proposed. Many properties in our sector do not meet the existing SHQS SAP standard, so increasing these further will only worsen matters. Bring the other 76.2% of the countries housing up to the existing 2015

SHQS before making higher targets. This would have a much greater impact on energy and affect the vast majority of our population and therefore have a much greater impact.

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

Smart meters are the best way to let everyone better understand their energy use and therefore manage their consumption – this is not just restricted to tenants.

The Scottish Government should also have public education campaigns to raise awareness and start education early in schools. Citizens need to have information and advice regardless of the tenure they live in. Tenants are not a special group of people who need special advice.

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

Helpful  Unhelpful

Not accurate and ignores differences in size, length of exposure, where exposure. The results given for Now are not what we find when using software so therefore not convinced that they are accurate and that measures proposed will achieve what is stated.

**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

Age and type are good starting points but quite limited, although it is appreciated that this will inevitably be the case when trying to generate universal case studies.

No age banding for 4 in Block properties when obviously there will be differences just as there are for other property types based on age.

What about property types aged 1964 – 1976?

What about property types post 2007?

**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?**

Age bandings for 4 in block properties.

Age banding for property types aged 1964 – 1976

Age banding for property types aged post 2007.

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

Good – easily understood and already used widely in the sector.  
Government needs to decide which rating it wishes to use EE or EI,  
depending on what it is actually trying to achieve with the EESSH.

**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.**

Based on a lot of assumptions. For example, many properties did not have full central heating systems in 1990. Therefore the % change will be greater than the model assumes.

Questions regarding accuracy of examples also, depending upon software used. The example of a mid floor flat given on page 32 illustrates this well as it is unlikely that such a flat would only require cavity fill from its 1990 position in order to comply with SHQS 2015. Also very unlikely that addition of double glazing and new heating system would enable property to meet 2020 target – the sector has many mid floor flats that will fail this 2020 target, so either the example must be inaccurate or there is a problem with RdSAP software – this should be a priority for the Scottish Government to resolve.

What is the difference between a lower floor in a block property and a ground floor gable end flat? Likewise, what is the difference between an upper four in a block property and a top floor gable end flat?

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

Yes  No

Many of the measures are neither realistic, feasible or cost or energy efficient to undertake. For example, the studies give a 1992 -98 electric flat and advise that to meet the 2020 target then this flat will require new post 2003 double glazing, new fan storage heating, and new immersion. However, if the property was built 1997/98 then it will only be 22 years old at 2020 and it would not be cost or energy efficient to carry out these measures, indeed it would be inefficient as it completely ignores the imbedded energy of the original fittings – how can it be efficient to replace windows that are only 22 years old? Additionally, there would be no ECO or grants to replace such windows so tenants would need to pay for this through rents.

Similarly, the case studies give a 1999 – 2007 electric flat and advise that to meet the 2020 target then this flat will require new fan storage heating, new heating controls and new immersion. However, if the property was built 2006/07 then it will only be 13 years old at 2020 and it would not be cost or energy efficient to carry out these measures, indeed it would be inefficient as it completely ignores the imbedded energy of the original fittings. Additionally, there would be no ECO or grants to replace such fittings so tenants would need to pay for this through rents.

Many of the case studies show that, in addition to other measures, floor insulation would be required to bring properties to the standard, however, the disruption and upheaval to occupants of installing floor insulation is ignored as is the actual capacity under flooring to take insulation. Even assuming that there was space under the floor board to add some insulation and that the floors could all be easily lifted to allow this, the assumed cost is greatly underestimated as the cost of the works would be added to with the cost of replacing tenants flooring that has been disrupted during the process. The cost also ignores the cost of actually trying to get tenants to agree to allow such work to be undertaken.

Solar PV systems are costly and will only be efficient in reducing energy if occupants of a property are at home during daylight hours to use the power generated. Therefore they are not realistic to achieve the energy saving intended in the case studies.

Meanwhile the owner occupied and private rented sectors need do nothing – so obviously unfair and ineffective.

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

Please see answer to question 10 for examples.

**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?**

The inclusion of the owner occupied and private rented sector.

**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.**

The main dwelling types should be broken down further into age bands to be more realistic about what can be achieved by which dates – please see answer to questions 10 and 11 for more clarification.

Also, because the EESH is restricted to social rented homes it reduces the ability of social landlords to have their properties meet the standard where their stock is in mixed tenure blocks.

**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

Scottish Government needs to be clear about what it wants to achieve with EESSH, it will not always be possible to improve the EI rating without reducing current EE rating – what is more important for the government? Also EE rating is so inaccurate in terms of costs to occupants that it is largely ignored.

What is the difference between a lower floor in a block property and a ground floor gable end flat? Likewise, what is the difference between an upper four in a block property and a top floor gable end flat?

**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.**

The case studies are inaccurate and give higher RdSAP ratings than can be achieved for some stock, especially mid and top floor flats, including those with double glazing, cavity fill, efficient gas heating systems, 100% LEL. When RdSAP software was last upgraded it resulted in reduced ratings for properties, so a mid floor flat property put through the software now will have a lower rating that when it was put through the software about 2 years ago and will therefore be less likely to meet to C(80) target, without there being any improvements that can be cost efficiently made.

What is the difference between a lower floor in a block property and a ground floor gable end flat? Likewise, what is the difference between an upper four in a block property and a top floor gable end flat?

**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

For the reasons given above in previous answers.

A much better challenge would be to export the challenges to the owner occupied and private rented sector to treat all Scotland's housing stock and occupants equitably and fairly.

**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

The target has to be realistic if off gas areas.

The SHQS and energy targets are much more undermined by restricting the



targets to the social rented sector. A much better challenge would be to export the challenges to the owner occupied and private rented sector to treat all Scotland's housing stock and occupants equitably and fairly.

**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 should only be considered if it would apply to all housing stock regardless of tenure at the same time. Not sure how practical it would be to achieve by any date.

**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.**

However, dwelling types and proposed ratings need to be reconsidered.

**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?**

Should apply to individual homes, but should allow cloning of data for types of properties. We should be measuring the EI of the stock we own, but not how the occupant decides to live in it. For example, when we provide a home we do so with 100% LEL and explain benefits to occupants but this is usually quite quickly changed by the occupant – something that a landlord cannot control.

However, because the ESSH is restricted to social rented homes it reduces the ability of social landlords to have their properties meet the standard where their stock is in mixed tenure blocks. If the obligation of the standard applied to all housing stock regardless of tenure, this could be dealt with and social rented sector tenants would not be penalised due to living in a block with non social sector owners.

**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

The standard cannot be met for many properties due to the Scottish Governments failure to apply the standard to all housing stock in Scotland regardless of tenure. As the EESSH is restricted to social rented homes it reduces the ability of social landlords to have their properties meet the standard where their stock is in mixed tenure blocks. If the obligation of the standard applied to all housing stock regardless of tenure, this could be dealt with and social rented sector tenants would not be penalised due to living in a block with non social sector owners.

Additionally, tenants may refuse to allow the necessary work to be undertaken in their home. To deal with this the Scottish Government would need to enable quick recourse for landlords to have Courts issue orders enforcing tenant to allow the work to be undertaken.

Exceptions would need to be dealt with on a case by case basis.

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

The funding that takes the form of a loan will have to be paid for by tenants through increased rents, therefore this does not assist the aim of dealing with fuel poverty as it simply transfers the cost for reducing energy bill to rent charges.

Funding in the form of grants is largely restricted to the poorest quality stock that has little previous investment, therefore landlords who have invested in their stock are penalised as they do not receive grants. For example, landlords may have previously replaced old G rated boilers to standard efficiency combi boilers at their own cost to assist tenants, whereas, those who did not can now claim grant money and replace their old boilers to higher efficiency combi boilers. The landlord who used their own resources to change from G rated to standard efficiency will now need to use more of their own resources to change again to higher efficiency – neither a cost nor embedded energy efficient process.

Green deal should be restricted to the owners of stock and not the tenants of the homes as they can agree on measure that future tenants will need to pay for without choice.

**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

Previous examples given above should clearly show this:

Many of the measures required to meet the standard are neither realistic, feasible nor cost or energy efficient to undertake. For example, the studies give a 1992 -98 electric flat and advise that to meet the 2020 target then this flat will require new post 2003 double glazing, new fan storage heating, and new immersion. However, if the property was built 1997/98 then it will only be 22 years old at 2020 and it would not be cost or energy efficient to carry out these measures, indeed it would be inefficient as it completely ignores the imbedded energy of the original fittings – how can it be efficient to replace windows that are only 22 years old? Additionally, there would be no ECO or grants to replace such windows so tenants would need to pay for this through rents.

Similarly, the case studies give a 1999 – 2007 electric flat and advise that to meet the 2020 target then this flat will require new fan storage heating, new heating controls and new immersion. However, if the property was built 2006/07 then it will only be 13 years old at 2020 and it would not be cost or energy efficient to carry out these measures, indeed it would be inefficient as it completely ignores the imbedded energy of the original fittings.

Additionally, there would be no ECO or grants to replace such fittings so tenants would need to pay for this through rents.

Many of the case studies show that, in addition to other measures, floor insulation would be required to bring properties to the standard, however, the disruption and upheaval to occupants of installing floor insulation is ignored as is the actual capacity under flooring to take insulation. Even assuming that there was space under the floor board to add some insulation and that the floors could all be easily lifted to allow this, the assumed cost is greatly underestimated as the cost of the works would be added to with the cost of replacing tenants flooring that has been disrupted during the process. The cost also ignores the cost of actually trying to get tenants to agree to allow such work to be undertaken.

Solar PV systems are costly and will only be efficient in reducing energy if occupants of a property are at home during daylight hours to use the power generated. Therefore they are not realistic to achieve the energy saving intended in the case studies.

The sources of funding are not available for many of these examples and costs would require to be met from tenants rents.

Meanwhile the owner occupied and private rented sectors need do nothing – so obviously unfair and ineffective.

**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.**

Comments

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

HEED would be the most logical and could be developed to capture all data required.

**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 SHR monitors the SHQS and reports on this, however, they are not a technical body and it is not clear how their system could manage this. If the energy standard is intended to eventually cover all stock, regardless of tenure, then a better system would be to further develop HEED.

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

Yes  No

More costs associated with set up and organising of works to meet standard. Most costs associated with resources (staff time, IT systems etc) required to record, update and monitor against standard. More costs associated with resources required to advise tenants on changes and impacts etc.

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

Yes  No

In order to monitor progress to 2050, we first of all need to accurately know what 2050 actually means in detail for our sector. The Scottish Government needs to clarify this in great detail. Five or ten yearly intervals will allow progress to be monitored whilst allowing new technologies to be taken advantage of as they become available and hopefully more affordable.

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

Yes  No

It could be wasteful determining and undertaking measures to meet and surpass 2020 targets, only to find out that they will not be sufficient for the

2050 target. We need to know what we are aiming for now.

**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.**

Yes – there is a great inequality by restricting the EES to the social rented sector.

A much better challenge would be to export the challenges to the owner occupied and private rented sector to treat all Scotland's housing stock and occupants equitably and fairly.