

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.

Glasgow Housing Association (GHA) has invested over £1.3 billion in improving the energy performance and fabric condition of housing in Glasgow over the past decade. We have had independent verification by Heriot Watt University of the savings afforded to householders of £330 per dwelling based on 2011 prices. We have also saved over 30,000 tonnes of CO₂ through thermal efficiency improvements.

GHA has installed 500 photovoltaic systems across Glasgow to reduce Fuel Poverty. In addition to our dedicated Fuel Poverty Advisor service which delivers individual advice and support; Since inception the service has achieved a cumulative saving through tariff switching or correction of nearly £600,000.00

GHA has renovated a number of high rise – 'hard to treat' – blocks in the city, retrofitting a Combined Heat and Power district system in conjunction with our extensive ongoing external wall insulation programme. We build all our new homes to Eco Homes 'Very good' Standard. We have also developed The Glasgow House, which is designed to have a total annual heating cost of around £100 when built in 2010.

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?

Non admittance due to refusals.

The government (or local authority) could assist with supporting mixed tenure blocks where often owners are not willing or able to participate in a thermal efficiency programme, meaning the whole block loses out.

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

GHA has received positive feedback for our External Insulated Render work and have been able to draw in CERT funding to assist with owner contributions. However, a large proportion of our SHQS non-compliant stock is associated with refusals from mixed tenure blocks.

The Title Deeds enable a majority of owners to vote no to improvement proposals, against the wishes of the majority owners in the block who wish

work to proceed. The issues are mainly concerning the cost of measures being prohibitive to a large number of owners.

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

- Public meeting
- Individual block meetings - minuted with minutes sent to all owners, explaining cost breakdown and full proposals
- Leaflets and explanatory material
- Demonstrations of materials and photographs of finished projects
- Ring-fenced Govt. grant - means tested, with 50% minimum being commitment
- Help with grant applications
- Demonstrations of materials and photographs of finished projects
- Payment plans with time extended to pay at no interest (as part of a debt recovery strategy)
- Application on behalf of owners for energy efficiency grant monies - gathered in bulk and then distributed by us so that owners do not need to take any action to receive the grant

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

GHA has a significant and growing Fuel Poverty concern. Our work with partnership organisations suggests that nearly 30% of RSL householders are in Fuel Poverty. Therefore energy efficiency is the largest component of increasing costs that we can influence.

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

Greater thermal efficiency may help reduce instances of 'self-disconnection' as those with a very limited set budget may be able to make this go further.

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

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.

We would anticipate that a new policy such as this ought to include a comprehensive equality impact assessment to identify significant risks to specific groups.

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.

Such individual financial risks may be more pertinent to the private householder or landlord.

As an example the elderly single householder who may have owned a large property for many years but no longer has the financial capacity to improve the dwelling.

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

The inclusion of minimum standard efficiency of heating appliances and controls within the provision of SHQS compliance.

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?

High rise multi story solid wall apartment blocks, as many exist in Glasgow and will remain.

System build houses constructed under Scottish Special Housing Association, such as Wingets, Unitroy or Wimpey methods.

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

There would need to be the requirement for all to use a minimum SAP/RdSAP version such as the issue commencing in 2013.

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.

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

Yes No

In the main, however time and temperature zone control is potentially impractical or ineffective for dwellings of the lower than average size prevalent within the RSL stock.

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

External Wall Insulation (not just 'solid wall insulation' as shown on your list but EWI to properties that may have a non-traditional cavity such as high rise blocks, where cavity fill is not an option).

'Upgrade Boiler' may need to be more specific, giving a banding upgrade requirement.

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?

Fuel switch from solid fuel/oil/electric to gas/biomass or other low carbon technology.

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

However there are anomalies within the various RdSAP versions that mean ratings lose or gain depending on the transition between updates.

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.

If there are challenges these can be addressed at the time.

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 many property types, the minimum EPC level is not much higher than the SAP rating requirement under current SHQS standards and in some cases below.

Given that the challenging targets set by the government for a low carbon economy, the level of improvement required within this consultation fall short of the general trend across the economy. A backstop rating of D(65) ought to be mandatory.

This is especially pertinent, given that ECO and Green Deal will require 'D' rating by insulation improvement before other more expensive technologies are considered. In addition Feed-in-Tariff eligibility is dependant on meeting the 'D' SAP rating. Therefore, this strategy ought to be in line with the other major policy requirements.

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

These are below the current requirements, therefore representing a reversal over the coming years.

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

In Glasgow (or another dense urban area) this might not be such a challenge as compared to rural locations, however with judicious application of communal heating retrofit GHA could achieve this target.

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.

Set a minimum percentage reduction in emissions. This will therefore allow rural regions to reduce by a proportion based on potentially a worse starting position.

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?

No. As not all homes will have been EPC rated or will need to be. Some allowance should be made to practicalities the collection of SAP figures, however it should be possible to apply an improvement factor to a collection of dwellings based on the same measures having been installed.

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

Again, it should be permissible to provide cloned results across a number of identical stock in a given area, rather than recalculate the same results without alteration.

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?

In support of the government's 2020 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

Where demolition is planned within a reasonable period prior to the 2020 cut off date. For example 24 months.

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

The Energy Company Obligation.

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

It would however not be financially prudent nor desirable for the overall purpose of reducing carbon to create a situation where perfectly effect measures are removed to install marginally better alternatives. Such as the removal of non-traditional cavity fill to access free external wall insulation through grants.

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.

We would expect a thorough equality impact assessment to form part of the strategy's development.

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

Smart meter cumulative consumption data (un-protected) across domestic meters.

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

Provided the SHR was sufficiently resourced to fulfil this task.

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

Yes No

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

Yes No

Following the 5 year pattern as at present.

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

Yes No

So long as there is a mechanism retained within the proposals (should there be the decision to go with a percentage reduction) that the required reduction is increased or decreased to reflect the trend in progress towards the goal.

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.

This is better assessed through a more comprehensive equality impact assessment, as per question 24.