

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.

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?

Energy efficiency – where neighbours, etc will not agree to works or where buildings are of a non-traditional type.
Funding towards pilots to calculate actual data of carbon instead of relying on assumed data through RdSAP and EPCs.

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

Very difficult to get buy-in from owner occupiers (even when grant has been sourced) especially in properties that are privately leased out. Where the Association has front-funded works, it is difficult to recover all monies due and sometimes legal action is required.

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

This very much depends on tenants' personal circumstances. Fuel poverty is on the increase due to increased utility costs so for some tenants this is a priority. However, for many tenants the priority remains kitchens and bathrooms.

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

Improving the fabric of a property is critical. However, this can be problematic due to construction type etc and more research is required into the effects different types of insulation products have on properties. Awareness raising should not be tenure specific, although it is accepted that generally speaking those in social housing can be more vulnerable this is not always the case.

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

Through utility bills – alongside the bill introduce information on ways to reduce consumption.
New products – legislative change is required to ensure that all new electrical products meet a certain energy efficient standard.
Smart meters fitted in properties that show consumption (and cost) of utilities.
Funding of energy advisors and allow them automatic and free access to historic information regarding consumers utilities (following a signed mandate)

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 comment

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

Smart meters fitted in properties that show consumption (and cost) of utilities.
Better information on different products/makes/models and their performance.
Face to face interaction to advise on methods of reducing consumption whilst still enjoying their homes.

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

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?

All non-traditional construction types – as data on the effectiveness of different insulation products when related to various non-traditional house types is not readily available and mistakes could be costly.

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

SAP/RdSAP methodology should not be used as it does not accurately reflect the effectiveness of various improvements to a property. E.g. fully insulating a property using certain products will not alter the ratings but tenants will notice a visible difference.

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.

No comment

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

Yes No

Further measures – the efficiency of boilers can reduce dramatically after installation

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?

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

If not, please explain why.

There are many factors that impact on the energy efficiency of a property other than purely taking into account the house type and method of heating... What value would this provide landlords or tenants?

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.

Comments

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

Modern electrical heating systems are producing much better results than their predecessors therefore these should be given consideration – especially when linked to solar thermals/photovoltaics. They are also much less onerous to maintain.

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

I think that there is no willingness to consider modern electrical systems as appropriate forms of heating for certain house types. This is an error due to the performance of such systems.

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

What about tenant choice? Many tenants living in rural areas prefer open fires/stoves. Renewable systems are not always cheaper for the consumer and are significantly more expensive to maintain over their lifespan.

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.

Prefer the first option. However, regardless of the option chosen, actual usage will not be considered unless there is a link with consumption.

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?

There should be the ability to clone information across similar property types/sizes/heating methods.

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

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

Comments

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

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

Comments

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?

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

Comments

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

Yes No

Comments

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

Yes No

Comments

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

Yes No

Comments

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.

Comments