

**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.**

There are already a substantial body of RSL's who have developed and are implementing pioneering developments in terms of energy efficiency and sustainability utilising a broad range of measures. There are also many who have moved beyond the initial trial of innovative measures and are showing clear strategic leadership in wider implementation and rollout.

Knowledge of these projects, programmes and key contacts has already been established by the team within Scottish Government; it is disappointing that the Scottish Government choose to withdraw funding support from the Energy Efficiency Learning Network which was key to ensuring that exchange of ideas and best practice creates a collaborative and positive culture which drives forward change in the sector.

**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?**

Hanover has not currently finalised any abeyances as we feel they have to be fully supported by the appropriate technical justification. It is however likely that the principal abeyances will relate to the lack of cavity wall insulation and 'hard to treat' properties. The Scottish Government could assist through supporting the coordination and exchange of information on projects and studies which are already being trailed and researched through organisations such as CIC-Start Online. It could also facilitate more detailed and in-depth research by funding initiatives such as the Technology Strategy Board Building Performance Evaluation focused on retro-fit installations. It is only by the evidence from real life projects that a number of these technical issues can be addressed

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

Not applicable

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

Not applicable

**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 experience has been that residents are not primarily focused on 'energy efficiency' or 'sustainability' but on reducing their outgoings and achieving a degree of comfort. If the measures implemented help them address these issues then they will support them. However, modelling and demonstrating the savings that residents potentially could make when accepting investment in what they may regard as 'hidden' measures versus meeting their desire for newer kitchens or bathrooms (despite SHQS compliance!) is not an easy sell. Achieving affordable heating comfort is a greater priority for those household who spend longer in their properties throughout the day.

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

The assumption that any savings from energy efficiency measures should automatically accrue to the tenant puts a potential barrier in the way of effecting measures which could be cost effective if the saving was shared between landlord and tenant i.e. should energy efficient housing have higher rents as has been proposed by the previous Housing Minister.

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

While we wholeheartedly agree with a duty to promote energy efficiency, assisting tenants in managing their energy use there are mixed messages which emanate from the Scottish Government. The message of country with abundant renewable energy beyond its own requirements does promote the message that it is essential that all of us think differently about and reduce our energy use if the real carbon reductions are to be achieved.

**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.**

Lower income households are generally disadvantaged through the current practices of utility companies' e.g. pre-payment meters, lack of flexibility to change suppliers due to debts etc. We welcome the ability for households with debts up to £500 to have the right to change suppliers, however there needs to be better policing of actions by utility companies.

**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

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

As noted smart and display metering that provides real time information will help focus people's minds; smart metering will also help improve billing and budgeting for many households.

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

Helpful  Unhelpful

They provide an initial 'rule of thumb' however it will be essential to ensure that the Associations' stock is properly modelled.

**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

There will always be a need for further case studies for other types of dwellings, however it would be more practical and sensible to allow Association's to share knowledge and experience as noted in the response to 1a. A method by which work undertaken by Associations could be validated by peer review to add the portfolios of approved case studies would be useful.

**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?**

Single storey cottage type properties which represent a significant proportion of amenity and basic sheltered housing; in addition these properties will achieve lower ratings due to the higher proportional external exposure.

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

It would appear from those trained in the new RdSAP that this does offer greater flexibility to include 'actual' data rather than simply assumptions which have in the past led to erroneous ratings. These erroneous ratings

would then often result in having to model the property utilising the full SAP system at greater expense in order to obtain more accurate data. We do however support the use of RdSAP / SAP as this means that modelling already being undertaken for building regulation compliance or in the provision of EPC's can be utilised to build up a more statistically accurate picture of stock rather than utilising an alternative method which could lead to additional outlays.

**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.**

These assumptions are measured on the baseline of the applicable building standards at the time. It does not take account of the measures incorporated at time of build by RSL's that may have been beyond the minimum levels.

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

Yes  No

These seem somewhat basic and lack detail – almost as bad as the standard EPC recommendations. In the example on page 22 there is no mention of thermostatic radiator valves, hot water controls and a simple assumption that 'double glazing / post 2003' should be a measure. From the modelling carried out the sensitivity of measures such as these and the impact within the RdSAP / SAP should be given.

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

Not applicable

**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?**

See above

**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.**

Not applicable

**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

Not applicable.

**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.**

Not applicable

**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

Not applicable

**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 weighting given to fossil fuel gas systems within the current RdSAP and SAP models is flawed.

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

We currently have a number of rural properties which are heated by solid fuel systems – the choice of fuel is a choice of the tenant and from our perspective these can be fuelled on wood fuel pellets (biomass). We also have one site which has a dual oil and biomass district heating system and are about to convert three remaining oil sites under the RHI to have oil / biomass. In all these cases the primary fuel will be renewable and we

believe it is on this basis that the source should be stated.

**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.**

Not applicable

**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 – this is the way that SHQS is measured, however is should allow for appropriately applied statistical modelling.

**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

No just model them using SAP.

**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?**

This will need to be modelled, but it will be significantly harder to achieve such reductions for these types of poperties.

**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

Exceptions claimed by landlords should be the subject of independent technical review / verification. Measures should be agreed which set

minimum measures to be implemented taking account of the technical difficulty, investment required and remaining building life.

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

Not aware of any not listed.

**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 answer should be caveated by the fact that more detailed modelling (not just case studies) are required within the portfolio (utilising the revised RdSAP). The lack of funding outside of ECO eligible areas to deal with hard to treat still presents a barrier.

**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.**

Not applicable

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

No

**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 does not have the necessary technical skilled staff and indeed its function should be to focus on higher level regulatory engagement rather than the detail. We would suggest that the SBS division on Scot Govt. take on this role through annual submission of returns by Social Landlords.

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

Yes  No

The use of RdSAP will not be suitable in all cases and additional costs in modelling utilising SAP will be incurred, particularly as part of the due



diligence design checks which should be undertaken within the refurbishment or re-design of a building.

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

Yes  No

We agreed with the current milestones suggested.

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

Yes  No

Not applicable

**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.**

Not applicable