

**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 x No

**Question 1(a): If 'yes', please provide details, including any web links/contact details you may have.**

Our proposed capital programme to 2015 focuses heavily on biomass and other renewable installations. We are also involved in a procurement process to commission a framework of independent energy advisors to visit tenants with new heating installations and ensure they make the best use of their new systems.

**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?**

A proportion of tenants will always opt-out of Scottish Housing Quality Standard (SHQS) works. We will continue to provide tenants with advice and ongoing support to encourage access for these works.

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

We aim to cooperate with owners and offer them opportunities to engage in energy efficiency works e.g. gas extension works are very attractive to private owners in mixed tenure estates.

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

We are hoping to involve energy agencies in promoting gas extension works to private owners. We have also entered discussion with wood pellet suppliers to encourage the uptake of these installations in the private sector.

**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 X

Reducing fuel bills and improving the comfort level of their homes are the main priorities for tenants.

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

[ ]

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

We need to consult more with tenants and link energy measures directly with tenant priorities such as affordable warmth. A reduction in fuel bills is not always achieved by installing energy measures and more work is required to improve the use of systems and create tenant confidence in future installations.

**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.

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

As discussed previously we are currently tendering for an energy advice service which will benefit tenants with new heating. We have also entered discussion with Scottish & Southern Energy to promote the roll-out of smart meters in our stock.

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

Helpful X 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 X**

We currently model energy measures based on our actual stock types.

**Question 8 (b): Are there any other types (including hard to treat) that you would like to be included as a case study?                      Yes X No**

**Question 8 (c): If yes please state type and say why you think they should be included?**

We require more information on timber-framed properties and on properties built between 1965 and 1975.

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

We currently use this methodology for calculating energy ratings for SHQS. We require clarification as to what calculation methodology will be used for the new Standard.

**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.**

We lack detailed stock data dating to this period. The example given indicates a far higher level of pre-SHQS compliance than is realistic.

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

Yes  No

Most of these measures have already been applied to our stock to meet SHQS. Given the rural nature of Highland it will be important to have specific case studies on biomass, enclosed solid fuel appliances, air source heat pumps and super-insulated properties. These should reflect the characteristics of Highland stock and issues with supply chains and contractor availability.

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

**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?**

Solar water heating should be modelled and there should be detailed analysis of biomass installations.

**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.**

We support the *principle* of having a minimum environmental impact standard. However we have concerns as to what these ratings should be set at and how it can be achieved given the issues requiring clarification:

- Each landlord has different house type descriptions and hence there could be scope for inconsistency in how dwellings are defined.
- The energy efficiency rating is based on fuel costs and hence has more relevance to achieving the Scottish Government's target of affordable warmth than the environmental impact rating. We would like the assurance that achieving affordable warmth is not directly or indirectly compromised by striving for higher environmental impact ratings.
- There are no proposed ratings for fuels such as biomass, solid fuels and oil.
- The change to the Standard will be difficult to explain to tenants who face the prospect of major energy works in their homes soon after having SHQS works carried out.

**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

Yes, all energy undertakings should be positive and not have this detrimental impact.

**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.**

Both our Housing Information System and our stock survey database are focused on collecting and maintaining information relevant to the current Standard. There may be significant IT and resource issues in amending this information to ensure it fits with the new proposals and requirements for stock details.

**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

Given the extent of borrowing and rent increases necessary to reach the SHQS it is unrealistic to expect tenants to accept the rent implications required in meeting the new ratings. There is also the potential to divert significant resources away from building affordable new homes in Highland. The ratings themselves are far in excess of the current Standard and there is the possibility that numerous properties may struggle to meet the new targets even if there is considerable investment in them.

**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 ratings give more flexibility than the table at 6.7.

**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 are already carrying out extensive fuel switching and renewable works in order to meet SHQS. The proposed requirement will need the support of the Scottish Government and other stakeholders to promote confidence in renewable technology. Many of our tenants have already opted-out of such works because they do not want the upheaval of fuel switching particularly if they have been resident in a solid fuel-heated property for many years.

**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.**

**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.

**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

We believe the Standard should apply to all properties.

**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?**

More research is needed to identify what this would involve. Many of the unusual dwellings in Highland are likely to be off-gas and more analysis is required.

**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

Tenants should continue to have the right to opt-out of energy works. Landlords should take appropriate action to encourage tenants to buy-in to these works.

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

We will continue to seek funding to maximise our capital programme. Discussion will continue with relevant stakeholders to ensure that Highland will maximise Green Deal funding. It will be helpful for landlords to receive clarity as to the level of this funding in Scotland as soon as possible.

**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

Meeting the SHQS will continue to involve substantial borrowing and has the potential to increase rents and divert resources away from tenant priorities including new build housing. As discussed above the level of funding needs to be identified to allow certainty for future programming of works.

**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 support any efforts to maximise gender equality in this sector.

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

Energy companies should be obliged to provide landlords with more data on energy consumption in properties. This could help identify high energy users, the fuel poor and poor standard buildings.

**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

We are content for the SHR to fulfil this role although it would be useful if there was more opportunity for discussion with them to assist with the reporting process.

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

Yes  No

Meeting the SHQS has involved considerable resource allocation in terms of stock surveying and data management. We would encourage the monitoring and reporting process to avoid bureaucracy as far as possible.

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

Yes  No

The proposed 10-year milestones are appropriate.

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

Yes  No

**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.**

We do not identify any further opportunities but would support any efforts to promote equality issues.