

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	x
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 X

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

However, we are about to do a ground source heat pump system at an existing building along with Solar PV panels.
Colin Armstrong at Loretto HA. colina@lorettoha.co.uk.

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?

Exemptions are not an issue for the association.

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

Not relevant to the association

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

Not relevant

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 X No

I say yes but uptake on energy advice offered through the association has been patchy. Evidence of supply switching is limited despite the savings that can be achieved by shopping around.

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

Tenants are more interested in financial savings rather than energy efficiency as an end in itself. Also limited awareness of reduction in carbon as a benefit/priority.

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

Comments

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.

Unlikely. Possibly those who are disabled and spend more time at home would benefit more than other 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.

No

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

Awareness raising particularly after new insulation/heating systems installed. To avoid the "heating on/windows open" syndrome. How to deal with more technological responses which leave people with less control over the heating system.

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

It is helpful to have a smaller range of broad property types but it does mean a greater chance of inconsistency in how associations code similar properties. We have blocks of flats that are 2 storey but are not 4 in a block – more like a terrace of flats. Maybe it would be worth giving advice to rsls if they have queries on how to code a property.
Should the first three flat types (ground, mid and top) vary if at a gable end?

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?

Comments

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

Need to ensure that all EPCs done to date are still valid.

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.

Not sure what the standards were at that time. I suspect a lot wouldn't as they may have been built well before 1990 and not had any improvement work to improve energy efficiency.

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

Yes No

For advanced measures –Some consideration be given to renewable energy meeting say energy needs of for example 5/15/25% of your properties.

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?

See 11. This is not really a measure to make a property more energy efficient but it does potentially assist with addressing fuel poverty and reducing use of fossil fuels and therefore carbon footprint.

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 seems to be 2 audiences – tenants who will want to be reassured that properties are energy efficient; also a wider audience interested in reducing carbon dioxide emissions. Is it not feasible to run with targets for both energy efficiency and reducing carbon dioxide emissions?
Two targets would however have an impact on administering record keeping.

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

We are mainly new build in last 15 years so have high levels of attaining targets so far. They could be very challenging for some landlords but no doubt they will highlight this if it is the case.

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 don't think it necessarily undermines the SHQS but it is an anomaly.

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 seems very restrictive on landlords who are not currently on the gas supply system or have properties in small scale developments where

renewable energy options might prove too expensive unless there was substantial grant aid to make it affordable.

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.

Comments

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

Don't know enough about these hard to treat properties. The consultation document (6.14) mentions 10% of rsls stock so it does seem to affect quite a few properties. However, are the properties so far out from achieving the targets that a separate system has to be established?

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 figure relates we understand to the national figure set for Scotland to achieve. Only query is whether all sectors are set the same target, is this based on research?

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

But this is on the condition that if costs are too high, then grant funding is available. Current examples of abeyances should be retained.

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

Provided that grant funding is available in situations where costs are disproportionate. We do not believe that the green deal will be of much use to rsls and their tenants. We also need greater clarity on how ECO funding will work and what the total resources available will be. Our concern is that these programmes will be a reduction on those available through CESP and CERT. Adequate funding is essential to achieve the targets and to minimise exceptions.

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.

Very much in support of this. Would it also be extended to individuals from ethnic minority groups or those with a disability (dependent on degree of disability) if there was similar evidence that they were under represented?

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 X No

For resurveying properties where energy efficiency work has been carried out.

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

Yes X No

Every 10 years?

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

Yes X No

Yes, but state by when it will be done.

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.

Has the consultation document been raised with groups representing minority groups and some dialogue ensued?