

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 No

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

Comments

Many councils, like North Lanarkshire, will have adopted policies to improve the energy ratings of the boilers they install in their stock ahead of the changes to the Building Regulations in 2010. In North Lanarkshire, the practice of only installing "A" rated boilers has been in place since 2005 and through increasing investment in this area the council currently has approximately 67% of its 32,000 properties in gas grid area having such boilers installed. This action alone without the improved controls also fitted, is estimated will have saved tenants between £100-£300 each year.

As part of our heating programme we fit Danfoss time switches with our combination boilers, which are fitted remote from the boiler, and not the integral time switches. These are easier to work with, offer better functions and are larger than the integral ones. We also fit a double LED room thermostat which shows that the unit is receiving power and working in line with manufacturers guidelines. This helps at call centre level to diagnose faults and is a good visual aid to tenants so they are comfortable their system is working.

In addition to undertaking feasibility studies for large scale CHP and PV installations, the council is also undertaking a number of pilots for renewable technologies which may be considered for installation as part of boiler renewals in the future.

Finally, as part of its planned 1000 property new build programme, the council has surpassed the current building regulations and is building houses to an "eco standard of "good" using a mixture of renewable technologies and building design.

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?

Comments

The council's currently highest level of exemptions relates to tenant refusals predominantly in relation to its replacement kitchen/loft insulation programmes. This is followed by an inability to undertake works due to owners' refusal to participate in projects.

The council currently has 700 exemptions which relate to the NHER ratings, many of these are for properties within multi storey towers. This is due to the properties within the towers, despite being thermally overclad, having electric heating. These properties are currently the subject of a feasibility study for CHP.

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

Comments

Since the removal of 100% means tested grant aid, the council like many others, has seen a 50% reduction in the level of owner participation in its investment programmes.

The exclusion of the extraction costs for non effective cavity wall insulation from CERT/CESP grant funding has had an impact in terms of owners' participation in such projects, despite the council offering 50% grant aid towards the costs of this work carried out as part of investment programmes. The inclusion of this element within the UHIS programme for the private sector has seen success levels of between 60-70% achieved in North Lanarkshire.

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

Comments

To try to improve take up levels, the council has recently reviewed the methods it uses to engage with owners. This includes: -

- Increasing resources for income maximisation services
- Review of all correspondence to owners in investment programmes
- Increased use of email and photographs to landlords to ensure they are aware of programmes
- Continuation of 50% grant aid towards the cost of certain works
- Continuation of dedicated members of staff to liaise and assist owners
- Increase in repayment period for owners from 3 to 5 years for their share of the cost of the works
- Introduction of a "hardship" grant allowing owners in specific financial circumstances to participate in programmes
- Increased use of powers via Tenant Management Scheme (TMS) to undertake works

As the majority of these changes have come into effect in 2012, it is too early to review their effectiveness in terms of improving owner occupier participation.

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

Comments

Through concerns with regard to their increasing fuel bills, many tenants do see increasing the energy efficiency of their homes as being a priority. For many tenants this predominantly relates to the heating systems in their homes as opposed to works such as cavity fill or the improvement of the loft insulation levels/changing attitudes etc. This is confirmed by the high level of refusals by tenants to undertake loft insulation improvements to their homes much due to the requirement to remove items within the loft space.

From experience, many tenants do not seem to see the direct correlation between savings on their bills from having such cavity/loft insulation measures undertaken to their homes as opposed to changes being made to their existing heating.

This may be due to tenants feeling they are more directly in control of the heating within their homes and the associated costs whereas the savings that are quoted for the installation of works to the properties themselves appear more remote.

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

Comments

Savings and comfort are the two main benefits of energy efficiency works, although wider environmental and climate change issues may be important for some tenants.

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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.

Comments

No – as stated the policy aims to focus on the fabric of the building as opposed to individual tenant's energy use.

The proposal to include a duty to encourage tenants to reduce their energy consumption would also cover all groups however it is unclear how such could be measured as the installation of energy efficiency measures to improve tenants homes may not mean a reduction in fuel bills, but rather an increase in the level of comfort they achieve in their living conditions by the heating being on for longer periods of time.

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.

Comments

No – see answer to Q 5.

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

Comments

In previous energy efficiency schemes, the ability to clear lofts has assisted in the installation of loft insulation and increased take up of these programmes. This would be of benefit in future schemes.

Bringing forward the roll out period for the introduction of smart meters as outlined in 4.13 would provide tenants with “real time” information on their energy usage and their ability to immediately see the impact on their energy consumption that changes to how they live in their homes makes.

Also, having greater availability of local energy advice centres for tenants to contact would be of use.

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

Helpful Unhelpful

Comments

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

The list is detailed but it is unclear why properties between 1964-1976 have not been included as 33% of North Lanarkshire Council’s housing stock was built during that period. This period also covers a considerable proportion of

build within the new towns.

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

Multi storey towers should be included in the case studies as they are more common in larger population areas and currently make up over 4000 flats with North Lanarkshire. This property type has its own peculiar issues and potential solutions that can be expensive.

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

Comments

It is recognised that an easy to understand and quick methodology has to be utilised and SAP/RdSAP which links to the EPC process confirms the policy proposal that the standard should treat the building itself as opposed to usage of it by its occupants.

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.

Comments

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

Yes No

Comments

The improvements in these columns are feasible and realistic, however they can be costly if used on a large scale e.g. PV panels are expensive when compared to the benefit it gives to the tenants and with the reduction in FIT it is not an attractive investment.

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

Despite the expense of such a system, District heating should be included as this would decrease the space heating costs of a property and has wider economic uptake and adding this to some of the case studies would encourage this.

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.

Comments

The environmental impact rating is the most sensible rating to use as it is in alignment with the carbon reduction targets within the climate change legislation.

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

This is reasonable as tenants may be more interested in how much it is to heat their home, rather than any carbon saving. If installing measures increased the cost of heating the home, this could potentially call into question the works carried out and any local energy efficiency strategies.

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

Comments

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

Comments

There is an issue that a detached/bungalow heated by electricity could pass the EESSH but fail the SHQS. We feel that this undermines the EESSH rather than the SHQS as it is perceived that the new energy standard will be a higher than those previous to it.

If a detached/bungalow property heated by electricity is exempted from the NHER/SAP of the SHQS then it is probably due to it not being financially viable to bring the standard up. We don't think lowering the standard for this type of property solves the energy efficiency issues.

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

Comments

North Lanarkshire Council has just over 100 properties not heated by any of the above. These are tenants choice to have such heating systems and all having been previously offered replacement systems

The proposal would seem appropriate however it has to be considered that many landlords will offer some form of freedom of choice regarding heating to their tenants and that in some areas tenants may still receive concessionary coal allowances which may affect their views on changing their principle heating source.

This may not still be applicable by 2030 but it would be felt appropriate that an exemption category for this or tenant refusals would be available.

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?

Comments

Yes –current standards are on a house by house basis so it is unclear why a new standard would not follow the same format. However, we would not agree that we should have an individual EPC for each of our houses. Cloning of rdSAP data should be used to cope with no accesses to certain properties and the overall size of our stock.

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

Comments

We agree that the case studies cannot cover all house types and having a generic percentage based system is advantageous. A potential issue is calculating the baseline 1990 position as even though the size of the property has not changed, some information may not be known e.g. original heating at time of build, any alterations to the property etc.

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

As outlined previously, it is felt an exemption category should be available where it can be demonstrated that despite measures having been undertaken or planned, a property is not capable of being improved to provide this reduction.

None compliance could potentially affect the future of that property, whether

we sell or demolish the property.

As the type of properties being discussed are unusual, it would not be possible to provide an arbitrary proposed level of reduction. The above is felt to be an appropriate method of considering the actions taken by the landlord to improve the energy efficiency of the property.

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

Examples of such have been provided in 17 and 20.

Refusals by tenants/owner occupiers to participate in works should also be included as per the SHQS.

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

Comments

Apart from self funding either from the HRA or through prudential borrowing, the list is comprehensive.

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

It has to be recognised that the majority of funding schemes available are loan funding as opposed to grant aid often at levels of funding no lower than can be achieved through the PWPB.

It also requires to be considered that the lead in time for large scale projects such as CHP which includes tenant consultation etc affects the ability to look to secure funding, as much relies on the project being ready to start before funding can be confirmed. This inability to confirm if funding can be made available for large scale projects can make them unviable in terms of being able to progress a business case with all associated identified risks

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

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

Comments

HEED currently includes information on all EPCs and it is held in the same format as is required by the Housing Regulator. It may be appropriate to inform all landlords that they must have the database updated with all EPC works by a certain date.

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

Rather than the housing providers submitting annual returns for the energy standard, it may be more appropriate for the SHR to access HEED to collect all the EPC information. This ensures independence and releases housing providers from yet another monitoring framework.

Housing providers would have to work with the HEED to correctly identify the tenure of each address. This would make HEED more accurate and a better tool for identifying areas within the local authority that require energy efficient works.

HEED could also collect any information on potential exemptions.

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

Yes No

Comments

In terms of the costs associated with monitoring process, it will depend on the level of information and detail required as part of any annual returns.

The area of particular uncertainty in terms of any returns for a monitoring service would be how to measure if a duty was placed on landlords to provide energy efficiency advice to tenants. It is felt that this could be most significant area of additional costs for both landlords and the associated monitoring service.

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

Yes No

Comments

10 year milestones from 2020 would ensure progress measurement.

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

Yes No

Comments

Clearly there are a number of uncertainties within the emerging market of renewable technologies which will affect the long term plans for meeting future standard. It is hoped that the costs of such technologies reduce as their usage increases within the market, often with social landlords taking the lead in their implementation.

It would therefore be considered appropriate to defer milestones from 2020 to 2050 allowing progress at that time to be reviewed.

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

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