

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.

NA

Question 2: For landlords, what is the greatest cause of SHQS abeyances in your stock? Is there anything that the Scottish Government could do to assist in reducing abeyances?

We believe all our stock should meet the SHQS, but achieving an energy pass for properties with electric central heating is problematic – especially for larger properties.

We have upgraded the electrical systems in smaller properties and undertaking a programme of 'fuel switching' (from electric to gas heating) for larger properties where possible. These measures should make the properties compliant with the SHQS's energy standard.

The major problem we foresee that would cause us to request an abeyance is tenant preference for electrical heating (instead of gas). Some of our tenants are 'frightened' of gas and would resist switching even though their heating bills would reduce.

The grants for insulation upgrades, fuel switching and boiler upgrades have been advantageous. The Government's continuation of these schemes (and similar) would assist in the reduction of abeyances.

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

We have few owners in our stock, and therefore haven't acquired a depth of experience of mixed tenure improvements.

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

We haven't developed such solutions.

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

None

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

NA

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

The main concern facing tenants at the moment is the potential effects of welfare reform. The welfare changes plus increased energy costs will result in our tenants becoming poorer. We believe that energy efficiency will become more of a priority for tenants as their heating bills increase – *which, we think, will happen sooner rather than later.*

Re tenant awareness, we believe that you have to repeat and reiterate the message that energy efficiency will reduce fuel bills. The introduction of smart meters would help tenants' strengthen the link between energy consumption and cost.

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. We can't see how the proposals would adversely affect particular 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. We would have thought that it would result in an improvement to personal finances.

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

The mandatory fitting of smart meters, and provision of easy access to trained energy advisors who could provide impartial advice on energy efficiency measures, instruct tenants in how to set and use his/her/their heating system for optimal comfort and economy, and advise tenants (and advocate for tenants) on the most 'suitable' energy suppliers and tariffs.

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

Helpful Unhelpful

We believe that they would be helpful, but the case study example 'mid-floor' flat (Case Study 9G, illustrated on page 32 of the paper 'Case Studies of Applying the Energy Efficiency Standard Draft for the Purpose of Consultation') has a floor area well so much in excess of our properties that it is not representative of our flats that were build between 1950 and 1964. The floor area in the example is 110m², the floor area of our flats range from 40m² to 79m², with the 'norm' being around 62m².

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

None

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?

Post second world war flats that the City built in the periphery estates of Glasgow between 1950 and 1964. These flats were the dominant housetype replicated in Castlemilk, Easterhouse, Drumchapel, Pollock etc., and still common in these areas today. Given their prevalence, we would suggest that this type of property be included in the case studies.

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

It is the practical methodology to use and is 'fit for purpose'.

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.

NA

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

Yes No

We concur with the measures set out in the table on page 22 of the 'Developing an Energy Efficiency Standard for Social Housing', but disagree

with the measures set out in the table on pages 32, 33 and 34 of the paper 'Case Studies of Applying the Energy Efficiency Standard Draft for the Purpose of Consultation' (Cases Study 9G, 10G, and 11G). Our experience of properties of this is that 'Insulation' and '100% double glazing (post 2003)' are required to meet the proposed 2020 standards, not the 2050 standard (as illustrated).

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

None. We think the measures listed are representative of current 'remedies'.

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?

We think the measures listed are appropriate and relevant.

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.

NA

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

NA

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.

We don't have a problem in obtaining details, but we do have a minor problem with some mid floor flats achieving the 'target guide' minimum EE rating of C(75). We also have other concerns re the 'Broad Type'

designations that we wish to raise (and deem this question to be the most relevant to do that).

Re achieving the EE rating:- We have in house EPC Assessors and have ran improvement models on our software to help us assess how our properties will measure up to the proposed 2020 energy standards. This has highlighted potential problems in gas heated, (modernised) 1950-64, mid floor flats with an exposed 'end gable' meeting the target EE rating. Although the properties do (just) meet the proposed mandatory EI standard, we are concerned that they fall short of the EE standard (although that standard is not mandatory but for guidance. We would prefer our properties to meet both (the EI and EE) standards.

We have found this problem to occur only in 'end terrace' mid floor flats (our simulations indicate that our 'end terrace' ground floor and top floor flats will comply with the 2020 standards). As the 'end terrace' mid floor has a greater area of exposed external wall than a 'mid terraced' flat, a performance reduction is to be expected. We suggest, should the 'Broad Type' column be retained, the possibility of introducing an 'end terrace mid floor flat' option with its own rating be considered. We would suggest a rating of 78 would be appropriate.

Re the 'Broad Types':- Our EPC Assessors are registered with the BRE and use the 'BRE Open System' to generate EPCs. In that system there is scope to input four property types; house, bungalow, flat, and maisonette. There are six 'styles' to select one from; detached, semi-detached, mid terrace, end terrace, enclosed mid terrace, and enclosed end terrace. There is a further 'Floor Level' field (of basement, ground floor, mid floor, and top floor) for flats and maisonettes. These categories cover all possible property 'configurations'. As we are already using these property types in the generation of EPCs, we would suggest that the 'Broad Types' (on page 27 of the 'Developing an Energy Efficiency Standard for Social Housing' paper) be replaced with a list of 'Property Types' that match the property types used in the generation of the EPC, and that each be given its own EI and EE target.

The proposed targets illustrated on p27 show a difference of 5 for EI and EE between (gas heated) ground floor flats and lower four in a block, and a difference of 10 for EI and EE between (gas heated) upper floor flats and upper four in a block. The BRE Open System classifies ground floor four in a block properties as semi-detached ground floor flats, and upper floor four in a block properties as a top floor semi-detached top floor flat. As the EPC assessment process categorises four in a block properties as flats, we would suggest that the four in a block properties be omitted from the 'Broad List' and replaced with 'semi detached ground floor flats' and 'semi detached upper floor flats' under an extended 'Property Type' list.

The 'Broad Type' list is too narrow, and does not include targets for maisonettes. If the Energy Standard is to apply to every property in the social rental market in Scotland, then we must have set standards for every possible property type – having 'broad types' is not robust enough. To be completely thorough, the 'Broad Type' column needs to be replaced with a

'Property List' (column) that matches mirror the format of the BRE Open System, with differentials between targets.

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 think that it will be difficult for some RSLs to meet these targets for all their stock.

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

You have to be pragmatic and recognise that there is only so much that you can do improve energy efficiency for this type of property before it becomes untenable, leading to its condemnation and eventually, demolition.

Also, it may be in the future that electricity becomes cheaper than gas. If that happens, this type of property would probably have a better rating than a comparable gas heated property.

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 would agree with that statement.

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.

Establish a 'set of measures' is our preference.

In our opinion the practical measures that should be set as standard to improve energy efficiency are:- (where appropriate) 'fuel switch' from electric to gas; install an appropriately sized gas condensing combination boiler, controlled by trvs, a seven day programmer, and a roomstat; insulate the walls (internally, externally, or cavity fill) and top up the insulation in the attic to a depth of 300mm; fit (post 2003) double glazing; and fit low energy bulbs throughout the property (which will probably be the only type available by 2020).

These are practical measures that RSLs should be undertaking as a matter of course, but in essence, there is little else we can do to improve the energy efficiency of properties without substantial redevelopment.

There is a distinct possibility that emerging technologies will significantly enhance energy efficiency, but until these are readily available (and affordable), the measures outlined above are a sufficient standard to strive for.

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 we do agree with it, and yes it is practical.

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

None

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?

We do not know enough about this issue to make an informed comment.

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

We do not anticipate wholesale failure, but expect there to be some failures. We would assume that each case would have to be considered on an individual basis and treated accordingly.

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

We are unaware of other sources.

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

We can achieve it because we operate in one of the poorest SIMD areas, and therefore attract huge financial subsidies to cover the cost of improvement work, but we couldn't afford to do that without these subsidies.

We assume that carrying out similar work to properties located in more affluent areas and remote rural areas would be far more problematic (financially) for RSLs.

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 have no view on this.

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 is best placed to monitor this. We would have thought the SHR would monitor performance against the standard via the ARCs and through validation visits.

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

Yes No

We assume that the cost of £30 (quoted in item 8.11 on page 39 of the consultation document) relates to the cost of outsourcing 'en mass' survey and provision of EPCs, and not 'one offs'. Our experience is that the cost of outsourcing 'one offs' is substantially higher than £30.

In our experience, the in house cost of surveying and provision of 'one off'

EPCs is also more than £30. There are savings to be made by carrying out EPCs 'in house', but we do not think that these savings are as substantial as implied in item 8.11, and should be recognised accordingly.

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

Yes No

Ten year milestones are fine.

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

Yes No

None

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 cannot see how this presents an opportunity to promote equalities.