

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 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 checked="" 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.

Thistle Housing has carried out a large scale energy efficiency refurbishment across 1083 properties on the Toryglen estate in Glasgow working with Rockwool and British Gas. The development spans a wide range of building types with terraced and semi-detached houses, tenement blocks and retail outlets. The programme is expected to save 280,000 tonnes of carbon. Measures taken included installing loft and external wall insulation, draught proofing, solar PV and efficient gas central heating for those homes with gas and air source heat pumps for homes with electric heating. Some blocks were also fitted with district air source heat pumps.

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?

Comments

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

Rockwool has worked on a number of projects across the UK in social housing estates with private tenure resident. As identified within the consultation paper, objections to work being carried out by private tenure residents can affect the success or coverage of a refurbishment scheme. In our experience objections may be raised on the basis of the cost of contributing to works, disruption while works are being carried out or the private tenure residents may wish to distance themselves from social regeneration projects.

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

Our experience has been that resident engagement is essential when carrying out energy efficiency refurbishment schemes and is of particular importance when working in mixed tenure estates. Successful resident engagement strategies employed by Rockwool include holding open days where the scope of the work is explained along with the benefits of energy efficiency refurbishment works which include energy saving but can also include aesthetic and acoustic improvements delivered by certain measures such as Rockwool external wall insulation systems. Providing residents with examples of similar schemes and inviting their input, for example on colours

or finishes for external wall insulation, has also improved engagement. Our experience has been that offering the work free of charge to private tenure residents as part of a wider energy efficiency refurbishment scheme is a cost effective way of maximising delivery of the scheme. This is of particular importance in multiple-occupancy buildings where objections from private residents could lead to no improvements being made to the building as a whole.

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

Energy efficiency is a priority when considered on the basis of fuel bills and the financial savings possible however as mentioned within the consultation residents need the appropriate advice and support to unlock the potential benefits of the energy efficiency measures installed and the landlords are well placed to deliver that.

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

The potential financial benefits of energy efficiency and thermal comfort are important benefits but there are many more qualitative benefits that can be achieved. Aesthetic improvements instil a sense of pride in the residents towards their surroundings. Increased acoustic protection and thermal comfort both have long term health benefits as cold and/or noisy living environments are known to cause both physical and mental health problems. Thistle Housing intends to undertake follow-up surveys amongst the residents of Toryglen. Encouraging more social landlords carrying out refurbishment schemes to implement similar post-installation monitoring would help to build up a picture of these qualitative benefits which can be used as part of the resident engagement on future schemes.

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.

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?

The steps detailed in the consultation document represent a good approach to helping tenants manage their energy consumption such as basic advice, detailed education and support about newly installed energy efficient technologies and follow up visits to ensure correct 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

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?

Solid wall and hard to treat cavity walls can be upgraded using ECO funding to meet some or all of the costs. Modelling this as a case study for Local Authorities and Social Landlords would draw attention to the availability of this additional support which could enable more homes within particular areas to be improved. The economy of scale benefits this brings would make such schemes attractive to the energy companies as a cost effective way of discharging their obligation.

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

The use of SAP/RdSAP to calculate and regulate performance is appropriate and would provide consistency in measuring and monitoring however the Green Deal Assessment methodology, which is based on RdSAP but also takes into account elements of occupancy patterns and localised weather data, may provide a more accurate picture of the performance of Scottish Social Housing as well as highlight particular households that may require additional support due to their occupancy pattern.

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

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

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

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

Ensuring a dwelling's current Energy Efficiency rating does not reduce is a very important safeguard for the tenants to ensure that measures applied to their homes do not ultimately lead to increased fuel bills.

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

The suggested energy efficiency rating for electrically heated detached homes and bungalows does not undermine the SHQS where such properties could not meet the SHQS at a reasonable cost and would be subject to abeyances. Rather the suggested energy efficiency rating enhances the SHQS by ensuring that all reasonable efforts are made to improve the 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?

Rockwool strongly supports the proposals for converting all social rented dwellings which are not currently heated by gas, electricity or renewable sources to one of these by 2030 with the interim milestone of ensuring all such houses are insulated as effectively as possible by 2020. The proposals are a logical approach to dealing with these house types. For renewable technologies in particular, the proposed timescales will see these technologies becoming more mainstream and therefore more cost effective.

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.

Although setting a minimum percentage reduction is an appropriate standard for unusual dwellings as laid out in the consultation document, the proposed approach which allows landlords flexibility in how they approach the upgrade of their stock taking into account local skills, previous works on similar house types and supply chain partnerships is appropriate for the standard house types most commonly found.

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?

Applying the standard to individual homes enables landlords to account for measures already taken in particular houses/areas and thus target resources where they are most needed.

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

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?

Although setting the target at 42% is ambitious and likely to be achievable in many cases, it is important to ensure that all reasonable steps are taken to improve the energy efficiency of these dwellings even if the target cannot be reached cost effectively or practically. Therefore the target may be better expressed as 42% reduction where technically, economically and practically feasible and, where this is not achievable, all cost effective measures as identified by the EPC, including those measures eligible for ECO support, are to be installed.

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

The proposal to allow landlords more time in cases where private tenure occupants withhold consent for communal improvements as described should be included. However abeyances for specific homes on the basis of difficulty to treat should not be allowed.

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

Comments

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

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

Rockwool supports the proposal for the SHR to monitor the proposed standard as Social Landlords are already reporting data of this nature to the SHR and the SHR is already carrying out monitoring of the SHQS, therefore this would minimise duplication and undue administrative burdens.

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

Yes No

Comments

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

Yes No

Milestones are essential to ensure there is clarity about the long term policy direction and to enable Social Landlords to adequately prepare for the future. However there must also be short term milestones to ensure Social Landlords are on track to meet their obligations so those who are encountering difficulties in making the necessary progress can be supported. Obligated Landlords should develop and submit action plans to show how they intend to roll out the standard which can be used to check progress taking into account the individual characteristics of their stock. As stated within the consultation document, Landlords need to develop a good understanding of their stock as part of delivering the standard and this will form an important part of their goal setting.

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

Yes No

Although progress should be reviewed more frequently on the path to 2020, long term goal setting can reasonably be deferred until 2020 so that the lessons learnt about delivery of the standard can be taken into account.

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