

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 checked="" 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"/>

1. A global organisation, the Royal Institution of Chartered Surveyors (RICS) is the principal body representing professionals employed in the land, property and construction sectors.
2. In Scotland, the Institution represents over 11,000 members comprising chartered surveyors (MRICS or FRICS), Associate surveyors (AssocRICS), trainees and students.
3. Our members practise in sixteen land, property and construction markets and are employed in private practice, central and local government, public agencies, academic institutions, business organisations and non-governmental organisations – including housing associations. It is our members that provide us with expertise and advice.
4. Accordingly, we contacted our members with expertise in this field and have summarised emerging messages in the appropriate question answer boxes. Please note, in some cases where there was no consensus, or where individual cases/examples were provided, we have not commented.
5. Furthermore, RICS Scotland has some general viewpoints on this consultation, and these have been outlined below.
5. RICS Scotland fully supports the drive for a more efficient housing stock in order to reduce energy and thereby improve security of energy supply and reduce GHG emission.
6. It is imperative that energy efficiency improvements are proportionate; i.e. as more measures are installed in a property, the lower the improvement that the next measure will achieve. So in achieving the higher EPC ratings, the cost will be disproportionate to the energy saved.
7. There will be properties (solid wall, hard to treat) where the cost of upgrading will be disproportionate, i.e. they are a 'bad' G rating, and even when most of the affordable measures have been installed it will not meet the standard proposed. This could lead to the withdrawal of properties from the social housing market. It may be feasible to consider allowing landlords - who install all the economically feasible measures on a particular property - to be deemed to have met the targets, or to be given some dispensation in achieving a lower rating, or additional time for further improvements.
8. There are probably many properties which are listed or in a conservation area, where it will be difficult to reach the targets without the necessary permissions.
9. In regard to the consultation's comments about consents from tenants, this is a key issue and should be built more strongly into the requirements, as it is seen as a deal breaker for the Green Deal (in England). Green Deal providers cannot write a Green Deal Plan unless all the consents are in place, and this includes houses in multiple occupation where one person pays the bill on behalf of the house. Consents are needed from all the tenants, even those not named on the energy bill.

10. Some of the figures used for the measures seem to be missing some further considerations; for example PVs are shown as having a life of 30 years. The warranties on PVs would probably not extend that long - the usual life is considered to be 20 years, and to a certain extent there will be a lot of obsolescence in this sector. A hypothetical example would be comparing 20 year old PVs to 20 year old mobile phones - nobody will want them. In addition, they have omitted the need for the replacement inverter (about £1000 each) which converts the DC electricity from PV to use in the house or take it to the grid (if a FIT is applied for). These have a life span of around 10 years, so this could result in at least two replacements under the 30 year scenario.
11. This standard could be construed as is moving a little too fast, and a more phased approach, particularly for low rated properties, would be better. The Energy Act requirements for private landlords in England is to reach at least an E by April 2018 so reaching a C or D, though achievable for some properties, needs to be considered almost on a case by case basis.

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.

We were informed by our members within the housing association sector of pioneering acts and proposals. These will be included within their own responses to this consultation. However, some examples to highlight include:

- providing energy efficiency advice to customers and local residents
- installation of biomass boilers
- heat metering

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?

Not all member responses from our members indicated problems in this area.

However, from the responses that highlighted causation of SHQS exemptions, emerging themes came from when properties can not be accessed, where the tenants refuse access, mixed tenure, and being unable to reach agreement with private owners to carry out structural repairs to multi ownership properties.

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

RICS Scotland has no direct involvement in this field.

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

No comment

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

RICS Scotland has no direct involvement in this field.

However, it is likely that inefficiency will face rejection with the continuing rise of fuel costs, and this will force tenants to consider energy efficiency improvement in the future.

That said, in order to instigate behavioural change in tenants at present, provision of home energy advice needs to be in place

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

No Comment

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

Education and provision of advice – showcasing good examples and the benefits of energy efficiency would be a good place to start.

The introduction of Smart meters should be worth consideration.

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 comment

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.

Social landlords and private landlords are facing huge financial pressures at present. Providing monies upfront for improvement costs could prove problematic for both parties involved.

Furthermore, a balance would need to be struck to ensure that the costs of improvements do not lead to large increases in rents for tenants.

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

No further suggestions

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

Helpful Unhelpful

Showcasing many properties types in differing scenarios would be a good exemplar of possible outcomes and pathways to Standard implementation

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

No comment

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?

- Non-traditional housing
- Post 2007
- Multi-storey

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

SAP/RdSAP is designed for regulating energy performance, with the methodology being regularly under review. It is therefore capable of adapting to changing conditions.

As a deliverable standard which is already used by some housing associations, there is no reason to object to its use.

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.

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

Yes No

There was a general agreement with the suggested improvements. However, most responses mentioned they may not be applicable to some particular situations. Examples included: mixed tenure and mutually owned properties - particularly those within conservation zones or listed buildings.

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

N/A

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?

No comment

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.

No comment

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

No comment

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.

No comment

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

No comment

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

No Comment

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

Whilst this is a decent proposal, large scale projects would potentially be needed to tackle off gas-grid properties. This would involve close collaboration with the private sector.

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.

No comment

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?

No comment

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

This approach was consensually agreed as a suitable way forward

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?

A balance needs to be struck between on what can be achieved against the cost of the works - especially if works had already been carried out. It could be difficult to set a standard target for all dwellings under in this category.

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

Common examples included: tenant refusal, ownership issues, cases where obstacles are encountered in mixed tenure blocks, and properties which may be scheduled [within a reasonable time frame] for demolition or options appraisals.

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

No Comment

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

Not necessarily. There will be cases, such as listed properties, where improvement options are very limited e.g. in the case of listed properties, internal insulation which is very costly, disruptive and needs to be planned a

significant length of time in advance.

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.

No comment

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

No comment

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

SHR appears to be the most logical option.

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

Yes No

It is likely that additional staff would need to be taken on to fulfill progress monitoring. This could have an impact on most landlords – especially if regular EPC datasets are required.

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

Yes No

However, these must to be realistic and achievable. Progress should be monitored with ongoing research and update reports.

As economic conditions change and technologies improve (and potentially decrease in cost), milestones should be adapted to reflect the economic and social environment at the time of reassessment .

We would suggested milestones some where in the region of 5-10 years

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

Yes No

No comment

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.

No comment