

**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.**

We are aware of a number of areas of good practice and innovation, through the various forums we attend with other local authorities.

**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?**

There a number of reasons for exemptions from the SHQS and work is continuing in the current year to establish a more definitive assessment of the likely abeyances and exemptions from the standard. Going through the main elements of the Council's investment programme since 2004, we have had a number of refusals from tenants in relation to internal kitchen and bathroom installations; in terms of external common fabric and roofing programmes, refusals of work by owner occupiers have resulted in some projects being shelved; and more recently in relation to heating programmes – both tenants (reluctant to have further disruption) or owners in common (district) heating schemes (reluctant to meet the cost). One of the main issues for owners and private landlords is that the cost of works relative to their incomes / savings and ultimately the resale or rental value of properties are out of balance. The current inability to sell means that any improvement investment cannot be recouped from a future sale). The Council's Scheme of Assistance aims to support common work which contributes to achieving the SHQS; however the overall amount of financial support for owners has been reduced from previous levels and linked to the changes in housing market have adversely affected take up rates.

The Scottish Government could assist in some of these circumstances by providing more grant funding to help reduce costs to owners for common works or by marketing and publishing these more effectively – what about green deal?

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

Our experience has been varied over a number of years. Historically we successfully completed a considerable number of external common fabric and roofing projects with high levels of participation in the schemes from owners. This had been based on relatively high levels of input from staff and repair/improvement grants. As the amount of financial assistance has declined through the Scheme of Assistance, the take up rates have dropped. In 2010, we had a 100% take up rate and last year we had a 29% refusal rate.

Moreover, owners and private landlords in mixed tenure blocks are unlikely to consent to high cost measures, e.g. external wall insulation. Therefore where work is needed, very often it is minimum elements of work, which provide repairs / cosmetic work rather than improvement to the fabric which are consented to.

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

Over a number of years, we have developed a variety of ways to engage with owners and always seek to maximise involvement in work programmes which will benefit both tenants and residents. Our arrangements / procedures for consultation with owner occupiers in mixed tenure blocks, comprises of early notification, provision of costs, specification, choices where appropriate and consultation meetings. We follow up the general meetings with specific 'march in' to assess individual requirements and link residents to the system for financial support through the SOA.

**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

Yes, the overall costs of running a home are increasingly a consideration and concern for many residents. With 2/3rds of tenants on low (benefit level) incomes and in need to help with rents, the second most significant housing cost is often energy costs. The impact of high energy costs can and has affected tenancy sustainment rates, particularly in rural areas which are off the gas network. The main focus for individual tenants, particularly those on low incomes, is to ensure that their housing running costs are as low as they can be, whilst at the same time comfortable to live in.

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

In terms of benefits – it is noted that whilst the standard aims to focus on the fabric of the building, rather than occupant energy use (4.10), it is proposed to include a duty on landlords to encourage tenants to reduce their energy consumption (4.12). Whilst the objective of raising awareness and providing good information and advice to tenants is important and something which this Council has done and will continue to do, it is felt that the imposition of a duty on landlords to be responsible for tenants' behaviour is inappropriate. Landlords can play a meaningful part, however there needs to be recognition that the scale of the challenge rests across tenures, public bodies and utilities.

More specifically, in relation to the role of utility companies, many fuel poor households, paradoxically, are the consumers who end up paying a premium because they do not/ cannot use direct debit or are on expensive pre- paid meter tariffs

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

While the benefits noted seem appropriate we do feel that greater focus could be placed upon owner occupation. Given the predominance of this tenure in Scotland, it is important that efforts to change the culture and awareness of the issues relating to energy use should be acknowledged as a task which can be led and supported by Scottish Government and backed by local landlords as part of broader framework for action.

**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.**

Older people or other vulnerable adult tenancies may be at risk if new technologies are installed which confuse them and are not simple to use. It would be helpful in sharing practice if current solutions such as simplistic programmers / thermostats for new heating systems have been identified and which could be more widely promoted. To minimise risk, it is often the most vulnerable that require the greatest input and support to help ensure that they get maximum benefits and energy saving measures. These groups need to be targeted for both national and local support / advice.

**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. The main concern is, conversely, that some tenants choose not to use new systems because of concerns over potential running costs or difficulty in understanding new technologies such as different heating types or smart meters

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

As well as the roll out of smart metering in future, which is likely to help most households to better understand how their energy costs relate to usage and behaviour - and consequentially help to manage their energy usage; these have to be linked to a range of other measures such as better advice from the energy suppliers on the most appropriate tariffs; possibly reduced tariffs for those on benefits or those in fuel poverty / harder to heat housing; and a move away from pre-payment meters which have much higher fuel tariffs and therefore don't properly allow customers to relate consumption to cost

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

Helpful  Unhelpful

Yes, these are helpful, it is also important to model different heating types as proposed, since the same property type heated differently can be dramatically different, as can exposure. South Lanarkshire has a number of exposed areas which can impact on the cost of heating.

**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

See 8 above.

**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 properties including defective non-traditional properties and multi storey properties

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

Whilst we can see a benefit in using SAP / Rd SAP as we currently calculate these on our asset management database as well as collecting the data on the EPC's, it is important that there is a move towards standardising the approach. Section 5.16 suggests that either SAP or RdSAP calculations will be allowable for the purposes of the energy efficiency standard. The significant changes to RdSAP v9.91 were to ensure that the tool was fit for purpose and that all energy efficiency / renewables measures installed into a home under the Green Deal have to be able to be entered into RDSAP software when the dwelling is reassessed for an EPC. It is assumed that regional rather than national weather data will be used to assist with local modelling.

**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.**

This is difficult to assess accurately as we don't hold detailed historic data in this format back to 1990. However, assumptions could be made based on the elements considered for each property type such as single glazing, insulation levels and heating types, and values then modelled against these.

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

Yes  No

The proposed measures in the further measures column are mostly feasible – however in circumstances where internal insulation is the only option, there are practical issues and considerations from tenants about losing space within the home, as well as costs associated with disruption, decanting and redecoration as well as the measures themselves.

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

None – as energy usage other than space, water and lighting are the responsibility of tenants

**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?**

None

**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.**

It is recognised that both an environmental impact and energy efficient standard are needed to fulfil different purposes, however, if this is the main way of expressing energy efficiency, the Environmental Impact rating may not mean much to tenants in the context of how well their home is performing. It is likely that an energy efficiency and related running cost index would be more meaningful.

**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

In most circumstances, it is likely that the minimum energy efficiency rating should not decrease as a result of measures installed which are aimed at improving the environmental impact rating – however, in some cases such as the biomass example provided; this may not be the case. Moreover, measures fitted now (eg gas central heating) based on the most energy efficient technology may become less so if for example energy prices rise significantly in future.

**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.**

Yes - Based on the various ways property types will be assessed - ie on floor level, end or mid terrace, semi detached etc - it is likely to require considerable work and cost over time to produce a profile of stock and energy ratings since this will require new EPCs for each property. If cloned data for each type can be used to help profile the stock, this will be less of an issue.

**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

It is useful to express the ratings as minimum, since these provide a basis for gauging where standards are. No ratings should be lower than SHQS, however we

are aware that in some cases, properties will be exempted because of the prevailing circumstances (build type, location, fuel sources etc) and the aim must be to seek ways to improve standards in these properties where practical.

**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

Yes, as it may reduce the standard being worked towards since an SHQS exemptions could always be applied for. However, as it is likely that new standards, including these will replace the SHQS beyond 2015, it is important to focus on achieving or improving on the new energy efficiency rating.

**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 that all social rented houses should be heated from one or other of these sources. However, it should be noted that some electric heating systems, including newer technologies like air source, could still be deemed inefficient and costly to run. The other factor based on future changes in the global energy market is that by 2030, the use and cost of using gas or other fuels for example mean that currently efficient systems become very inefficient and costly to run.

**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?**

Yes, whilst the standard should apply to individual homes, it should be recognised that in the short to medium term until EPCs are available for each property type, a profile of stock and stock types against the standard are likely to be derived from cloned data on similar property types and characteristics and un-cloned over time (see Q14)

**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

No comment.

**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?**

No, a target of 42% is unlikely to be achievable in certain circumstances. However, the council recognises that the aim should continue to be to reduce emissions as much as possible and would suggest a target range between 20%-42%.

**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

Yes, there should be exceptions where works are outwith the landlord's control i.e. the works are refused by tenants or owners or are disproportionately costly. It is acknowledged that future legislation may make it ore likely that owners in common properties are required to participate in schemes and this would help to reduce the level of stock not improved. A system of abeyances is therefore required.

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

The current and historic financial landscape is complex and varied and despite reforms over a number of years, remains so. Knowing which European, UK or Scottish funding source is available, with multiple criteria and often complex bidding rules consumes resources in finding the funding rather than being able to deliver the outcomes. Funding streams should be, where practical, be merged and simplified, as noted in 7.12. One of the significant challenges is that owners are increasingly finding it difficult to participate and it is recognised that the proposals in the Green deal and ECO funding might assist in unblocking involvement. However, it is important that the individual focus of the green deal, which is aimed at tenants and owners, rather than landlords', is monitored at an early stage to assess some of the potential challenges of take up and pace of delivery.

**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

Loans will ultimately have to be paid back and unnecessary expenditure could result from not accessing the correct or most appropriate funding for the measures being provided.



**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.**

The promotion of career direction advice and the related training and skills development requirements for areas of employment is part of the careers advice process in schools and as people make choices about their future. In this context, working with the sector/ industry, Skills Development Scotland and schools, there is scope to promotion opportunities to address any gender imbalance.

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

The EPC; HEED database and SHR return are the main sources of which will enable monitoring of the standard – however, there are limitations on the information lodged in the HEED database because these are self reporting and the EPC is generally uploaded when the property is void. Most landlords do have information held on their asset systems which reflect works carried out (repairs and investment) however these would not necessarily translate into effective monitoring. One option is for a new EPC to be carried out and lodged on completion of significant energy related work such as heating installations, although there would potentially be a cost/ capacity issue for some landlords. Using the RdSAP software to generate energy assessments is another option for landlords with capacity to do so.

**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

We agree to the SHR monitoring the proposed standard on the same way as the SHQS is currently monitored.

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

Yes  No

Yes, there would be associated costs in developing, maintaining and updating an Rd SAP database. Staff resources, training would be required along with costs of monitoring and continually updating a database, as well as software / licensing and IT support costs. Also the cost of surveys and the production of EPCs if these are required for all properties.

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

Yes  No

Yes, we agree with the milestone dates set out in the consultation document.

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

Yes  No

Yes, this would be a logical step and would ensure that future milestones are set in the context of progress and any emerging issues in trying to meet the standard.

**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.