

**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.**

Comments We are only aware of RSL's working on new build developments, where higher EES have been trialled. One example is the Fife Innovation Showcase.

**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 None

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

Comments None

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

Comments ; HFS are proposing a Retrofit Reward Scheme for the offsetting of carbon emissions for new dwellings to 2013 & 2016 future requirements, by providing funding from new build development, which creates a pot of money to assist the upgrade of second hand stock.

**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 This is not a priority, unless full or part funding is used to offset the capital outlay. Many do not have the funds available to finance upgrade costs & often the process is complex, hard to do and generally unappealing. However this may encourage tenants to consider buying a new home as an alternative, as the cost of fuel rises and people aspirations change.

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

Comments N/A

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

Comments As noted above. Tenant awareness could be raised by introduction of SMART meters and RSL documentation on cost of fuel and benefits from upgrades. Easy to do upgrades should be promoted and means to deliver these made simple and hassle free. Offsetting capital costs needs to be considered somehow. Perhaps savings in Council tax.

**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 Those on low income, fuel poverty and perhaps elderly, where generally they don't have the savings or funds to undertake upgrades, unless subsidised in some way.

**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 Yes – as noted above, assuming the tenant has to pay.

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

Comments Smart metering may assist and easy to read documentation, simple example cards, switch of standby, use appliances off peak, zone controls etc– however behavioural change is hard to achieve and those with less interest in the dwelling, as they don't own it, are unlikely to change without subsidy.

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

Helpful  Unhelpful

Comments These should help, any case studies that can translate running cost benefits and promote tangible financial savings to income and acceptable capital outlay, would be encouraging & generally helpful.

**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 These look correct, but we are not RSL so unsure the housing stock that exists

**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 Don't know

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

Comments SAP is generally a well understood and available assessment tool, commonly used through the industry new and refurbishment by energy assessors. It should serve the purpose well if the background data and inputs are accurate.

**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 Don't Know

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

Yes  No

Comments Seems realistic, but there are no or little advanced measures. Unsure is any advanced measures will prove viable when considered of there lifetime. It maybe more economic to consider buying a new build property. There must be a law of diminishing returns and how far you can viably treat a home for the expected period you will stay in it. This break point (Viability Threshold) needs to be identified

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

Comments We believe the case for renewable upgrade solutions is questionable, when considering physical constraints, whole life costs and system performance/benefit. Seems a lot of capital cost being used to generate a relatively small return to home user, over a disproportionately long period. It maybe better to use this funding on cheaper more doable quick wins.

**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 As above

**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 None

**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 would seem logical in that any alterations do not reduce the energy efficiency, it should always enhance it. – Why do it otherwise?

**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 No comment – we don't hold stock, as a new build private developer

**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 In general YES, however pushing ratings to higher levels yield greater benefit, so perhaps a trajectory should be set over a longer timeframe so that landlords can plan ahead and evaluate impact on stock and viability. In some cases it maybe that it is better to demolish and replace with new, once a hard to treat dwelling has exhausted all its viable options, other than to consider replacement, over a 20-60 year cycle.

**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 We don't have sufficient expertise in this area, but generally electric heating is less efficient and expensive to run, albeit commonly used for off grid gas or hard to fit apartments. Greening the grid with renewable PV may assist but this is unlikely to make a significant contribution in the near to medium term.

**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 These seems a realistic option, assume this means that solid fuel & warm air options, will be outlawed or phased out as properties are upgraded over time.

**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 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?**

Comments Applicable to individual homes, as this relates to tenant fuel bills etc, albeit for terraces and apartments this maybe difficult to establish and confusing to residents. Orientation may also complicate things and should be avoided.

**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 A alternative should be provided for these units, including a

whole life analysis to determine where the viability threshold is and whether homes is salvageable to achieve compliance. It maybe that a replacement new build offers a better option in the long run.

**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 Unsure how accurate these projections are and suggest a planned phase is better driven on agreeable carbon reduction and fuel savings benefits

**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 There should be no exceptions; all 2<sup>nd</sup> hand properties should be targeted under the proposals, to ensure consistency of delivery & approach..

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

Comments Yes: Homes for Scotland (HFS) have developed a proposal and submitted this to Scottish Government, for consideration ahead of the forthcoming consultation on Section 6 Energy Building Regulations. The proposal is the Retrofit Reward Scheme. This is an offsetting scheme whereby a developer in a new build scheme, pays into a pot to assist fund refurbishment of 2<sup>nd</sup> hand stock. This is in lieu of achieving higher energy standards in new developments to 2013. The rationale being that funding 2<sup>nd</sup> hand upgrades, is a more viable form of lowering Scottish carbon emissions, as you achieve greater CO2 reduction, than would be the case with increasingly ratcheting up new build regulation. The proposal suggests £1500 per plot, 2013. At 10,000 new homes per annum the new build sector could generate £15m of investment. It is believed this proposal will be included in the consultation in due course.

Other funding should be considered from Green Deal, Green Investment Bank, CERT schemes, Energy providers & Private Investors (Possibly match funding HFS proposal)

**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 Broadly yes – However the viability threshold needs to be clarified, whereby old stock or hard to treat stock are disproportionately beneficial to demolishing and replacing with new build, when whole life costs are considered.

**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 We believe this is an good aspiration.

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

Comments – Can we draw upon the DECC database for Energy Efficiency of homes and projected fuel price increases.

**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 Use existing bodies wherever possible; this must be more efficient and cost effective.

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

Yes  No

Comments Other than cost of regulating, governance/administration, and auditing scheme upgrades ( and taking those to task whom don't comply), there should be no more costs.

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

Yes  No

Comments There should be clear milestones, to allow landlords to plan and prepare funding and solutions for their portfolios. We could not comment on what these look like and current economic conditions should be considered

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



Yes  No

Comments No – We believe the need is now and it fulfil Government’s commitment to reducing emissions, stalling would only serve to increase the step changes in the future.

**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 No

One thought would be – Why is this only applicable to Social housing 2<sup>nd</sup> hand stock. Should this not be considered for Private 2<sup>nd</sup> hand market, with funding through Green deal etc?

Note: It is important we do not allow this standard to cross over or confuse new build. New build social housing is well regulated through compliance with Building Standards and we see no need to change this.

In addition we strongly recommend the title of the standard is changed to reflect its governance. Meantime is can be confusing. We suggest that it is amended to Energy Efficiency Standard for 2<sup>nd</sup> Hand Social Housing”, or something of this type. As far as we can see it does not affect private sector landlords or new build social housing.