

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.

The following have all built high energy efficiency, low cost to heat housing using Val-U-Therm:

Highland Housing Alliance
Hillcrest
Kingdom Housing Association

The last of these used Val-U-Therm wall & roof panels for the Kingdom House, the first PassivHaus for rent in the UK and winner of the Green Apple Award for Scotland 2011. Have also used Val-U-Therm for five units at the Housing Innovation Showcase in Dunfermline - one of which is a semi built to PassivHaus standards coupled to a standard open panel semi built to Section 6 - 2010. These are being monitored and compared for energy efficiency performance by Edinburgh Napier University.

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?

No comment

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

Difficult when different standards between private & affordable, especially as affordable tends to be to a higher standard and private just creeps over Building Regulations.

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

Val-U-Therm building system - see www.valutherm.co.uk

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

The fight against fuel poverty is best won by providing energy efficient homes. A home built with Val-U-Therm can allow a typical family to live in a home that costs less than 50p per week to heat. The fabric first approach does not require understanding of complex Eco-bling type technology.

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

See above re fighting fuel poverty. It is obscene that in the 21st century people are still dying of hypothermia in their own homes. Especially when all the solutions are available.

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

The only issue is really education as when the issue is adequately explained no problems occur. For instance, the following quotation from Gillian Herd, Tenant, Kingdom House, "At a time when environmental issues are paramount we, as a family, feel it's a real privilege to have the fantastic opportunity of living here".

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.

In a recession all groups are under financial pressure. Equality of treatment and care with implementation are key.

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.

OK with a fair level playing field.

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

Education, education, education

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

Helpful Unhelpful

Yes, with plenty of sketches & explanation

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?

Integral garage - as hard to treat.

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

There are fundamental problems with SAP which are well known to constructional professionals working in this area. It is only a legal compliance tool and extending its use is risky. Needs investment to sort out SAP once & for all. See how effective the German PassivHaus Planning Package is. The spread sheet approach allows easy use, auditing and assessment.

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.

In general ok.

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

Yes No

OK - depending on funding

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

No comment

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?

Further building fabric upgrades. There are several coming on the market.

It is the only truly fit & forget approach

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

Most definitely. It is easy to chase down carbon and inadvertently not improve energy efficiency.

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 expertise to offer.

**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

All could be increased by about 5% with more emphasis on fabric solutions on a case by case basis.

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

Too much of a difference. Electric heated houses need to be addressed by fabric refurbishment. Not always easy, can involve tenant decanting, can

reduce room sizes but possible with tenant rotation, etc.

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

Important that policy decisions are not based on energy weighting factors which are likely to change over this timescale and possibly on political whims. If not in Scotland then from Westminster or EU. Also carbon efficiency does not equal energy efficiency. A focus on building fabric solutions would reduce problem with dwellings heated by oil, LPG & solid fuel.

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

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?

Exceptions may need to be allowed for but the number must be minimised

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?

Comments

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

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

Financial partnerships with private sector

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.

With modern working conditions, tools & equipment, there is no reason for gender inequality. Compare to construction industry in Russia where many of the job roles are female dominated.

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

SHR is ok

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

Yes No

Cost of remedial action following non-compliance? Assuming this may need to be slightly punitive to make overall approach cash neutral?

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

Yes No

3-yearly in line with Building Regulation cycle to 2020 or so. Thereafter five yearly.

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

Yes No

Outline milestones now - details later

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.

See answer q 24.