

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.

West Dunbartonshire Council – new council house building programme

Installation of photovoltaic cells on the new flats at Granville Street, Clydebank.

<http://www.west-dunbarton.gov.uk/housing/whats-going-on/new-house-build/>

Clydebank Housing Association

CHA Power Limited (CHAP) is a wholly owned subsidiary company set up by Clydebank Housing Association in 2005 to provide energy-efficient and affordable heat and hot water to the residents of Radnor Park, Clydebank.

<http://www.clydebank-ha.org.uk/cha-power-ltd.html>

Knowes Housing Association

Knowes HA installed solar panels on 120 existing properties a big programme of installing photovoltaic panels on their housing stock.

http://www.solarpowerportal.co.uk/news/100_clydebank_tenants_receive_free_solar_2356

Outwith West Dunbartonshire

Aberdeen City Council - Combined Heat and Power (CHP)

A project which provides energy efficiency, low cost heating in 14 multi storey blocks and 8 public buildings in the city.

http://www.aberdeencity.gov.uk/housing/council_housing/home_energy_saving/hoa_combinedheatpower.asp

Scotland's Housing Expo – Highland Council

52 houses created with the future in mind showcase the latest ideas on design and sustainability.

<http://www.scotlandshousingexpo.com/>

Housing Innovation Showcase - Kingdom Housing Association and Fife Council

Promotion of new construction methods that can be transferred to mainstream affordable housing.

<http://www.housinginnovationshowcase.co.uk/1901.html>

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?

West Dunbartonshire Council has not classified any properties as exempt from the SHQS. However, the Council has a high proportion of hard to treat/non traditional homes (37% of total stock) that cannot be treated with cavity wall insulation – overcladding with an insulated render is the only viable option.

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

Mixed tenure estates continue to pose a problem for the Council in meeting the SHQS – some owners are happy to participate but the majority decline. The Council has utilised repairs through the funding streams such as the Universal Home Insulation Scheme and continues to offer support to owners through the Scheme of Assistance. The Council will use the implementation of the Property Factors Act 2011 as an opportunity to have greater dialogue with owners.

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

The approach by the Council is to continue to engage with owners in a proactive manner through the Scheme of Assistance and the work carried out by the Council's Energy Advice Officer. The Council successfully utilised Community Energy Saving Programme (CESP) funding and will seek to utilise any funding through the Energy Company Obligation and Green Deal.

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

Improving energy efficiency is a priority for tenants within the context of living in a warm, comfortable, and affordable home. There does not appear to be a groundswell of opinion among tenants in West Dunbartonshire regarding the energy efficiency of their homes within the context of the carbon reduction agenda.

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

Although there is disagreement regarding the existence of a cause and effect relationship between poor housing quality and poor health, a warmer, more comfortable, energy efficient home will improve the quality of life for those with long term illness.

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

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.

Nobody should be at risk from a policy that sets out to improve the energy efficiency of their home. There is a risk that certain groups of tenants may not be aware of the proposed standard, timescale for implementation etc. It is important therefore that all social landlords have a well developed communication strategy. In addition, some tenants will have additional support needs to help them manage their home – including their heating system.

The consultation document states: *"It is therefore proposed that the standard includes a duty on social landlords to encourage tenants to reduce their energy consumption."* (page 16). Landlords are in the best position to provide their tenants with appropriate information, advice and access to suitable expertise to allow them to operate heating systems in the most appropriate way. However, there has to be recognition that for some tenants with particular needs, other agents such as support workers or family members may be in a better position to reinforce this information on a regular basis.

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.

The rationale behind the standard is to reduce the amount of money spent on fuel due to the increased energy efficiency of the home. Nobody, therefore, should be penalised financially. However, the bulk of the finance needed to meet the standard will come from landlords' existing capital programmes which are primarily funded by tenants' rents. The forthcoming Welfare Reform will place additional pressure on social landlords' revenue streams so landlords will be under pressure to deliver the standard within an affordable rental framework.

The fact that the standard will be applied only to the social housing sector generates an inherent inequity as tenants in the private rented sector will continue to pay higher fuel bills because of poorer housing quality in the private rented sector.

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

There needs to be a revision of how people think about domestic fuel. All householders (not just tenants) should understand the comparative values of different types of domestic fuel and what is “too much” to spend on heating a home. People make such judgements when choosing a car (i.e. miles per gallon) but do not think about energy consumed within the home in the same manner.

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

Helpful Unhelpful

The case studies will provide a benchmark which will help investment planning.

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

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?

The additional modelling work on non-traditional dwellings and solid fuel heating systems that is to be published as part of the final version of the standard is welcomed but some actual cost data needs to be reported also.

West Dunbartonshire Council has a high number of non-traditional/hard to treat homes and, specifically, it would be useful to identify types of non-traditional properties that could have external wall insulation safely installed and the costs involved in doing this.

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

Differences have been reported between results generated through the use of SAP and RdSAP – primarily due to the reduced sensitivity of the RdSAP methodology. To ensure a consistent approach in measuring changes in efficiency in new build and existing domestic dwellings, it is better to use RdSAP calculations as the basis for measuring performance against the standard.

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.

However, there may be some value in looking at an alternative baseline of 1997 – the introduction of the Home Energy Conservation Act (1995).

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

Yes No

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

All measures should be included within the modelled case studies to provide as much information for landlords as possible.

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?

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.

The Environmental Impact rating is the most practicable format for measuring the anticipated reduction in carbon emissions. However, the

Energy Efficiency rating is more meaningful to tenants and more practicable for landlords when formulating investment programmes.

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

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.

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

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

There are other house types that are equally as hard to make the energy efficiency savings that cannot take advantage of renewable energy sources e.g. multi-storey properties.

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

It should be possible to have all homes in urban mainland areas heated by any of these fuel types. However, this may not be feasible in mainland rural or island areas.

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.

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?

The standard should apply to all individual homes to ensure that all stock is improved. However, it should be recognised that some homes may not realise the efficiency savings as set out in the standard.

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

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?

Rather than set a fixed reduction, there should be an acceptance that the reduction in carbon emissions will be those achievable within the constraints set by the qualities of the dwelling and at a cost which is reasonable.

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

There will be properties in conservation areas or are listed buildings. These properties will need to be assessed on a case by case basis.

Any exceptions criteria should be reviewed to take account of new

technology.

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

See Q23.

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

The funding guidance contained at Appendix B of the consultation document is helpful but there is no certainty as to the amount of funding that will be available (and some of the schemes are now non-operational). The potential for ECO and Green Deal to deliver is great and the Scottish Government anticipates £200m being made available but this is not guaranteed. In reality, the vast majority of expenditure in meeting the standard will come from landlords' current capital programmes, funded primarily through tenants' rents.

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.

Whilst the Council supports any move that is made to ensure a greater number of females who wish to pursue a career in the construction industry, can do so, addressing barriers to access is outwith the scope of this consultation.

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

All social landlords keep stock investment data. This data could be collated and presented at the local authority level area as a HECA-style report on an annual basis.

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

The Scottish Housing Regulator currently monitors compliance with progress with the Scottish Housing Quality Standard so it is reasonable to assume that the Regulator will monitor performance against the new standard. However, we would expect the Regulator to assess performance

against the Standard within the framework of the Social Housing Charter.

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

Yes No

Currently landlords collect data on and monitor progress with meeting the SHQS so there shouldn't be any additional burden on landlords to collect this additional investment data.

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

Yes No

The proposed milestone dates (2020, 2030, 2040 and 2050) appear reasonable. However, there needs to be a clear understanding of what is expected to be achieved by these milestones. In addition, the achievements should be realistic to take in to account the uncertainties associated with long term financial planning.

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

Yes No

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.

Within the private sector, private-rented dwellings are over twice as likely to have a 'poor' NHER rating as owner-occupied. Eight percent of dwellings in the private rented sector are rated as 'poor'. In contrast, the energy efficiency rating of social rented dwellings is better than that for the stock as a whole (Scottish House Condition Survey: Key Findings 2010). Therefore, widening the scope of the standard to include the private sector would ensure equal access to warm affordable rented homes for all tenants.

From the perspective of the carbon emission reduction agenda more gains would be made by regulating the private sector.