

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.

WLC have installed air source heat pumps.
Solar PV panels have recently been installed in Council new build.
A pilot project to extract cavity wall insulation and refill is being undertaken.
However, none of these have been mainstreamed and any pioneering example must show continuing affordability and efficiency.

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?

Demolitions are the only exemptions

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

Some challenges to get even basic repairs done. The availability of financial assistance (loans) can assist but take up can still be patchy.

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

Loans of last resort have been developed for owners that cannot source the funding for themselves. This funding is secured against the property.

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

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

Yes, the focus needs to be on the potential for tenants to save money on

their energy bills and to keep warm.

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.

As the advice is for all social tenants it should not mean that any group is more at risk than any other, the key will be to ensure that the information and advice is widely available and can be accessed in a range of formats and languages. We acknowledge that people have different heating requirements depending on their circumstances and it is important that advice offered is tailored to the needs of the individual.

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 financial burden may not be in relation to a particular equality group but more perhaps on those tenants that are in hard to treat homes and may need extensive works to make the building reach the standard, if they haven't met SHQS. There may be an issue if rents are required to rise to meet the standard and what the impact would be when Welfare reform will impact on the ability of some tenants to pay their rent.

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

Advice and information needs to be easy to access and understand. There may be a need for specific targeted campaigns in certain locations, particularly where there has been historically low take up of energy efficiency measures. There is a need for tenants to understand their energy consumption and the use of smart meters may assist with this. Much of this information is available anyway but the issue is with the take up of advice and information. Making it a duty for Social Landlords to encourage tenants to reduce their energy consumption will only be effective if there are sufficient resources allocated to it and it is prioritised as an action as is done in West Lothian

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

Helpful Unhelpful

Yes, it is useful to identify best practice.

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?

West Lothian Council has upgraded many non-traditional houses and flats and learned many lessons especially in relation to external wall insulation systems and cold bridging. Examples of these house types may be useful to other social housing providers .

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

Providing the most up to date RDSAP is used and that it is continually monitored against full SAP for Scottish dwellings then we would support 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

These are realistic. Double glazing standard should be more closely specified to be the most energy efficient available at the time of the upgrade.

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

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.

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

There should be a safeguard to ensure that the dwelling's current Energy Efficiency rating should not reduce.

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

We would like more clarification on how the Standards will change over time with incentives for those already achieving the Standard or for those who easily achieve it.

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

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

Provided resources are available, this should be achievable in the timescale. We would like to see a scenario where renewable heat sources can provide all heating requirements for all house types but we do not consider the technologies to be proven at this 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.

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

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 Where this can be achieved through the means listed but not through renewables at this time

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?

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

We cannot force tenants to accept improvements to their homes and there is a significant challenge for mixed tenure blocks. There will always be some properties that may not achieve the standard – it then becomes a decision for the Local Authority what action can be taken to make them the most energy efficient that they can be. Reasons for exceptions should have to be given. It would be important to give reasons (financial or technical) why it is an exception and what is needed for the work to be done to meet the standard.

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

Not that we are aware of.

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

This depends on the continued availability of resources and the extent to which this work will be prioritised. There is severe budgetary pressure and there will be costs associated with the assessment. Works which we undertake should be affordable. We have concerns over the Green deal, particularly over the assessment. Tenants' household circumstances will change over time as well as repayment charges.

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.

Needs to be more publicity on the career options associated with retrofit/energy efficiency. There is a need to raise awareness about the availability of job opportunities through schools, colleges and Universities and career fairs and jobcentre and online sites There is likely to be a wide range of opportunities available and this could appeal to a wide range of people. The key is ensuring that the right training is made available and

that courses continue to be adapted in line with emerging technologies. There may need to be better linkages between the companies developing the innovative technologies and academia at all levels. .

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

Scottish House Condition Survey should be set up so that it can receive surveys from third parties that would meet their survey standards. This could help to improve the information.

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

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

Yes No

No cost in monitoring progress but there will be ongoing costs in regard to surveys to monitor continued compliance as properties deteriorate over time.

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

Yes No

Every 10 years as outlined in the consultation.

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.

No