

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 checked="" 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.

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?

Our greatest exemptions relate to kitchen storage capacity and will continue to be so given the nature of our stockbase. We also have a limited number of refusals. Most of our stock is tenemental with no cavity which we believe (following discussion with SG officials) is "n/a" rather than an exemption. Our exemption position may change if the new energy standards are adopted dependant on what property types the SG decide will be exempt from the standard.

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

Mainly in relation to structural and stone repair work, installation of door and door entry systems, rather than communal energy efficiency measures- although we have insulated common lofts and replaced windows in common closes where consent has been achieved.

Most of our stock is tenemental (insulated and uninsulated) with some new build (cavity fill, partial cavity fill or internally insulated) and have GCH so our ability to attract CESP or CERT for schemes has been very limited i.e. these programmes favour inter and post war cavity construction and RSLs with older gas heating systems (G rated).

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

Opportunities to pay in various ways for communal works, good communication, open days and close/ public meetings.

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, potentially for those who are in fuel poverty although improving the fabric may not necessarily reduce costs but may improve comfort levels for tenants.

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

Don't know.

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

N/A

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.

Not aware of any.

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.

Not aware of any.

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

Better understanding of available tariffs, not using card meters or more fundamentally ensuring that tenants choosing to pay this way are not penalised. Clearer information from energy suppliers on how to move between suppliers, better understanding of ways to save energy and keep their house properly ventilated and heated. Suitable assistance for tenants with support needs to understand how to better manage energy consumption.

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

Helpful Unhelpful

Helpful in general terms - but they need to meet the proposed standard if they are going to be used as case studies. Some of the case studies highlighted do not meet the anticipated standard e.g. the case study modelling done on the mid floor gas property pre 1919 solid wall shows an EI failure, the modelling done on the pre 1919 solid wall electric property shows failures for EI and EE at ground and mid floor. This perhaps highlights that it might not be easy to achieve these standards without insulation or further interventions.

Also, how near or far the case studies are from a pass or failure will also be dependent on the property floor area so a pass may not necessarily be achieved by the interventions proposed in each situation, i.e. they can only be seen as generic. It would probably be better to ensure that the case studies are based on a worst-case-scenario situation for each dwelling type, e.g. large corner flats.

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

Yes they are comprehensive although we note there is no modelling for multi storey flats or no-fines construction.

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?

See answer above.

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

It is ok (we have reservations about the use of EI as noted in our answer to question 12)

There are flaws in the SAP system. It doesn't necessarily reflect all available systems and tariffs, particularly those newer to the market which can negatively affect their SAP performance; e.g. when we previously modelled an electric wet system (thermaflow) it wasn't recognised by the SAP system, performing poorly even though it had access to the best off-peak tariff (E2000). We believe this is changing in the latest revision but how quickly will the SAP system be able to respond to other system/tariff options in future? It could be that RSLs don't make decisions because new systems don't collect sufficient SAP/EI points when in reality tenants may be

better off with these systems.

It also means that an EPC will be required for every property to show compliance with the standards. There is a cost to this - firstly to get a current position to ascertain what actions are required (it is unlikely Associations will have EPCs for all properties) and then on completion of works to show compliance.

As the SAP system is based on energy costs there is a current switch from electric to gas (better SAP, lower running costs, CESP/ CERT funding to switch). If we are tied to a system which is based on energy cost as gas prices increase (as they will inevitably as a natural and finite resource) there is the irony that there will be the potential for a switch back as gas heated properties lose SAP points.

We also have strong reservations about how the standards will be regulated and the suggestion which is being mooted in some quarters that they will be enforceable in law (this is different to SHQS). We would seek clarification that if the standards are not met by 2020 the SG will not be suggesting that properties cannot be let.

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.

N/A

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

Yes No

Further measures - they may be technical feasible but not necessarily realistic within the time period noted. For example we have taken stock from another landlord. The properties have been overclad, with double glazing and a substantial number have electric heating systems which are only 6-7 years old. Based on the EPCs received we believe just under 50% (150) of our transferred stock will fail the proposed standard and would have to be improved in some way, although this will have to be checked. Some of this is accounted for, e.g. new gas boilers, but we may have to consider replacing existing manual charge electric storage heaters with fan assisted heaters years before the end of their life expectancy. The full extent of meeting the proposed standard is not reflected in our costings.

The likelihood is this will be mirrored in our core properties (we have not had time to do this assessment). We therefore might also find that we have to go into properties before we would plan to do so e.g. to change heating controls to meet the standard and then go in again to upgrade heating

systems. This is not efficient (cost of getting access to properties, procurement and the work itself particularly if the failure is limited to 1-3 EE/EI points assuming energy efficiency bulbs have been distributed.)

Advanced measures for solid wall properties - are (technically) feasible. However this puts a financial strain on older landlords with pre-1919 tenements like ourselves. Many of our properties were refurbished in the 1980s and early 1990s on a 'patch and repair' basis or when insulation standards were minimal - a third of our stock has no wall insulation. The costs noted within the document for these measures is £5k. We believe this cost is low. We assume it was to retrofit insulation to walls internally. Do the costs include things such as refitting gas boilers, extending and resealing flues, remodelling kitchens & bathrooms located at external walls, refitting or replacing extract fans and alterations to electrics and potentially ceilings (coving). Not to mention the decoration cost (or allowance) to be offered to tenants. Have the effects on space standards generally and SHQS kitchen standards in particular also been considered. This is likely to be a conflict for us.

If we assume the £5K for retrofit (at today's costs) this would cost the Association over £2.1 million to achieve. Unless the situation changes we will not be blessed with access to grants as others landlords with properties with cavities have through CERT and CESP. The work is also much more invasive for residents unless decanting is considered which would be cost prohibitive.

We appreciate that Blown/injected insulation within the lath and plaster 'cavity' is a potential future option but we believe has still to be accepted as a standard insulation model. We would need to understand how this model deals with:

- window reveals when the stonework is not generally as thick and therefore there is the potential for moisture bridging.
- existing electric installations.
- poor lath and plaster install etc.

Finally whilst we would not argue against other landlords receiving grant (we believe that this type of work should be incentivised) it seems the more problematic properties have not had access to the same grant funding opportunities. This is set against a climate where the energy standards 'bar' is potentially to be raised and Welfare Reform will put further financial pressure on landlords. Those RSLs with more traditional stock will be *amongst* the most affected if new standards are to be applied. Essentially the fairness of approach that the SG is suggesting where *'all landlords will be expected to make an equivalent contribution relevant to their stock'* (6.6) is not reflected in fairness of grant availability and tenant disruption due to the interventions which will be required to meet 2050 standards in particular.

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

See above re insulation unless there is the potential to access grants rather than loans.

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?

Not aware of any.

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.

We are not sure about the use of EI. We believe it is more likely that tenants will understand the energy efficiency (EE) rating. EI is more related to what the Government is trying to achieve in CO reductions rather than what tenants are more likely to be interested in which is cost of heating and improved energy efficiency. In addition the EE application has been used for SHQS so continuing to use the same rating methodology would allow a consistent approach.

We have strong reservations about the level of the standards themselves and the suggestion that these will be enforceable in law (this is different to SHQS) . We would seek clarification that if the standards are not met by 2020 the SG will not be suggesting that properties cannot be let.

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

We understand the principle underlying the suggestion, however, the practicalities are significant.

Just looking at our flatted stock we will require to assess against 6 different EI standards (electric - gfl, mid and upper and gas - gfl, mid and upper.) If we have to cross reference this against the EE we will have to check against 12 different standards. We also have mid and end terraced houses and detached properties with gas and electric heating options which would mean we'd need to assess against a further 6 energy standards. We have over 1300 units. Other landlords will have all broad house types and

heating options which would mean they would have to assess against 32 standards.

Looking at EI only will require a significant level of interrogation which will be amplified if cross checking is required against EE. We would suggest that if the standards are to be applied either EI or EE is selected - not both.

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.

N/A

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

N/A

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?

The SAP system is based on energy costs and (where they can) RSLs are switching from electric to mains gas because they will obtain a better SAP rating, the running costs for tenants are lower and there is grant available to fuel switch.

There is currently the irony that RSLs are fuel switching for the above reasons but the Government's objective is to move to electricity as the main fuel source (whether it be generated by plant, wind or water).

Inevitably as gas prices increase (as they will as a finite resource) electricity will become the cheaper fuel and there is the possibility that many RSLs who received grant to switch to gas will switch back in the future either to offer lower running costs to tenants and/or to meet future energy standards.

We believe that the longer term view should be being considered now. Acceptance that SAP ratings might be lower to date if electricity is used as the fuel source - but that in future this position will change. There should also be grant incentives to remain with electricity rather than grant being tied to a fuel switch to gas/oil or poorly rated gas boilers.

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.

We believe that the ratings are too high. The proposed ratings in (gas heated properties) are some 25-30% above the SHQS requirement which is between 48 and 50 (depending on the SAP model used). For example our 3 recent new builds (with GCH) which were completed in 2010 and 2011(2004 Regs, with 2009 amendments) all have EI/EE ratings of between 82-85 for mid floors - only marginally over the new standard.

See also answers to Q.23 and Q11.

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?

If applied, we would agree with the argument put forward for individual homes. However there are financial costs associated with this.

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?

Don't know. It would really depend on the cost of interventions to meet the 42% target and this would depend on the dwelling type. Has the SG done any cost modelling on this basis against unusual dwelling types?

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

Consideration has to be given as to how viable it is financially to achieve the standard, particularly given the nature of some older house types and the practicality of adapting their structures.

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

Don't know.

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

We have transferred stock from another landlord. The properties have been overclad, with double glazing and a substantial number have electric heating systems which are only 6-7 years old. Based on the EPCs received from the selling landlord we believe that just under 50% (150 units) will fail the proposed standard and will have to be improved in some way (although this will have to be checked.) Some of this is costed for but we may have to consider for example replacing existing manual charge electric storage heaters with fan assisted heaters years before the end of their life expectancy. The full extent of meeting the proposed standard is not reflected in our transfer costings.

The likelihood is this will be mirrored in our core properties (we have not had time to do this assessment). We therefore might also find that we have to go into properties before we would plan to do so e.g. to change heating controls to meet the standard and then go in again to upgrade heating systems. This is not efficient (cost of getting access to properties, procurement and the work itself particularly if the failure is limited to 1-3 EE/EI points.)

The financial assistance also favours cavity properties (cavity fill/ external insulation) or individual or fully tenanted flatted properties where solar/ heat pumps can be more readily used. None of this is ideally suited to solid wall sandstone tenements, which are often of mixed tenure.

The 2050 standards as we've note earlier would require our older properties to be internally insulated. If we assume the £5K for retrofit (at today's costs)

this would cost the Association over £2.1 million to achieve. Unless the situation changes we will not be blessed with access to grants as others landlords with properties with cavities have through CERT and CESP. The work is also much more invasive for residents unless decanting is considered which would be cost prohibitive.

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.

None.

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

It would seem sensible to continue with the one regulatory body.

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

Yes No

N/A

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

Yes No

We would suggest every 10 years.

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

Yes No

N/A

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.