

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.

Williamsburgh H A decided to implement a pilot insulation scheme in relation to 2 ground floor, traditional tenement flats in Paisley. This involved the retrofit of under floor insulation, in addition to the insulation of the external wall cavity (behind drylined surface) with bonded bead insulation. Similar to the work that has been highlighted and undertaken by Historic Scotland.

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?

Small number of tenants who fail to co-operate in the Planned Maintenance Programme, for example: new heating installation.

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

Have not come across any major issues in this area.

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

N/A

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

It should be, but in reality I don't think it is for the majority of tenants

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

Yes, for the tenants who recognise the benefits

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

Energy efficiency is only one of a whole range of issues affecting RSL tenants. Some of whom have other more pressing issues affecting their lives, for example financial issues. If, however, we constantly send out the message, in terms of the benefits which can be gained, not least of which is financial, the message just might eventually filter through.

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.

No

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.

?

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

A sustained source of energy efficiency advice, examples of cost saving benefits and a national awareness raising.

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

Helpful Unhelpful

Only if relative and realistic

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

Possibly a wider range could be included

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?

Traditional Sandstone Tenements

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

I think this is a fair method for assessment as it standard for all RSLs

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.

As I understand, It is based on SHCS which is a little later

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

Yes No

Possibly if financially feasible

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

Approximate energy use. This measure is too subjective.

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?

None

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

Both these ratings are standard evaluations, used commonly via EPC and therefore an obvious choice. The figure we choose as a pass/fail is the important issue. Will it be realistic and achievable, whilst being aspirational enough to have an impact on the overall objective of the ESSH?

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

Too challenging in some respects: The standard set for 'Mid floor flat heated by gas' will be very difficult to achieve for my organisation and others with traditional tenement stock, I expect. We have newly refurbished properties which are well insulated with combi condensing boilers, double glazed, low energy light bulbs etc. and the properties concerned **just** pass the standard. I can't see how we are going to achieve the suggested standard for older properties?

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

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 may be aspirational goal, however, I don't know how practical this would be for rural HAs

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.

The Options need to be realistic and achievable.

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, however, aggregated figures may be useful as a summary indicator for benchmarking purposes. This should also take account of my comment in respect of how realistic this may be in certain cases.

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

Practical and realistic?

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

Without the improvement in technology, there will be properties that don't meet the standard. In some of these cases this will be very difficult to overcome. In these cases there should be an option for an exemption

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

Possibly ECO? Government funding still to be agreed?

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.

Comments

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

Comments

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

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

Yes No

Comments

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

Yes No

Comments

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

Yes No

Comments

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