

4. Please indicate which category best describes your organisation

(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"/>

General comments

Financial market transformation – largely focussed on the private sector. There is a potential for the advantages to residents of energy efficient homes could be reflected in valuations and mortgage lending. There is also the potential for energy efficiency to have a bearing on rent setting and this causes us some concern particularly if the savings on energy savings is offset by the increase in rent.

Improvements in standards is welcome but concerned that this raises costs at a time when grant levels have been significantly reduced. Raising energy efficiency standards through progressive increases in building standard and influencing procurement through the affordable housing supply programme could lead to the centralisation of procurement and this gives us, as a small RSL cause for concern. Also difficult to deliver on expensive sites/affordability issue for small RSLs with limited resources. There is additional funding of £4K to meet the silver standard but unclear whether this would be sufficient finding to meet the standard.

The proposal for a National retrofit programme is the best approach improving the energy efficiency of existing homes on an area basis driven by local authority. Whilst funding options are being considered in discussion with COSLA and the energy companies how this will filter down to RSL's is unclear. Also identifying areas for a NRP will be a major challenge, particularly in mixed tenure communities. Notwithstanding this we are supportive of the national retrofit programme which undoubtedly will be the most cost effective approach.

RSL's are already subject to regulation on energy efficiency through the SHQS however further Energy efficiency standards are proposed that will succeed SHQS from 2015 with the first target the 2020 standard. The standard will vary for different construction types and heating types. The standards that are to succeed the SHQS

have not been confirmed yet. Hopefully these will be available from the end of this year to allow landlords to plan and prepare. If these revised standards are made mandatory RSL's will not be allowed to let the property unless the property meets the standard. This gives us cause for concern. We already have plans in place to replace boilers with band A condensing boilers however there will still be a significant number of these outstanding by 2020. It is not affordable nor does it make economic sense to replace these boilers until the end of their notional lifespan.

It is unclear if the targets are realistic and achievable and whether or not funding will be available (bearing in mind other issues, such as welfare reform and reduced grants for new build) to allow the necessary investment to be made.

The Scottish Government are proposing to set minimum standards for the private sector (owner occupied and privately rented) however no date by which the standards will apply to this sector has been determined.

If minimum standards are introduced it should be across all sectors. Why should RSL's be penalised if they cannot meet the standard for technical or financial reasons. Also what about mixed tenure blocks where owners won't participate in improvement schemes. Private landlords whose property doesn't meet the standard will not be prevented from letting their property. Also people in low incomes may be housed in the private sector too. Standards should be a goal across all sectors, with exemptions and abeyances, but not mandatory.

The NRP could provide opportunities for training and the potential for operatives to develop the necessary skills. Also opportunities for energy advisors as having appropriate advice services to provide information to tenants on the efficient use of their heating and/or fuel switching is essential for the strategy to succeed.

Fuel poverty and energy efficiency is a major concern particularly when set against the backdrop of welfare reform. Improved standards are welcome however, they must be realistic and with funding to make it happen **and** it must cut across all sectors, not just the social rented sector.

In principle we support the setting of standards for energy efficiency in social housing however they must be both challenging but realistic and there needs to be sufficient funding to allow RSL's meet these standards.