

4. Please indicate which category best describes your organisation, if appropriate.

(Tick one only)

Executive Agencies and NDPBs	<input type="checkbox"/>
Local authority	X
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.

Fyne Homes – First Passivhaus unit in the country in their Tigh na Cladach development at Innellan, Cowal. Fyne Homes also pioneered smaller biomass CHP (combined heat and power) system in Lochgilphead, Argyll, using woodchip boilers to power houses.

West Highland Housing Association - innovative offgas, locally-sourced wood-chip, boiler-run system generating electricity and hot water for 89 properties in Glenshellach, Oban.

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?

As a stock transfer authority, Argyll & Bute Council no longer has a landlord function, however, we work closely with our RSL partners, particularly to deliver SHQS in mixed tenure blocks. Lack of owner participation is one of the major obstacles in this area. In addition, a significant proportion of dwelling stock in this authority, across all tenures, is hard-to-treat/non-traditional and is not suitable for cavity wall insulation. It is possible that a proportion of the older stock transferred from the Council to Argyll Community Housing Association will fall into this category.

The Council is working pro actively to engage with reluctant owners in mixed tenure schemes, and a stronger focus/campaign on advice and encouragement from government, targeted at these owners, would promote the necessary culture shift and help raise awareness of responsibilities.

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

Overall, experience is patchy with a number of mixed tenure blocks proving problematic and owners unwilling or unable to participate in joint maintenance and improvement work. Partnership working with RSLs and the promotion of our Scheme of Assistance to support private owners have had limited impact to date and the process is resource-intensive. Despite available financial assistance, uptake in these circumstances has been variable at best.

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

The Council works closely with local energy savings advice organisation,

Alienergy, and individual local energy efficiency projects to provide information and advice services for private sector owners, landlords & tenants and we have also collaborated on successful bids for UHIS funding. Dedicated investment has also been secured from Scottish Government & ring fenced to target work in mixed tenure blocks.

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

In principle, energy efficiency is important to many tenants (across tenures) where this will have a demonstrable effect on heating costs (this authority has particularly high level of fuel poverty and extreme fuel poverty, especially in remoter, rural and island communities) as well as in the general context of living in warm, comfortable and affordable homes. There are also, however, recorded cases of tenants unhappy to have necessary SHQS improvements/installations imposed upon them and while there has been some positive responses in the past to LHS consultation regarding the climate change/carbon reduction agenda, overall this aspect appears to be less of a priority at present 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, the suggested "potential benefits" are broadly right. Wider benefits include improved health & well-being in general and particularly for older, vulnerable households; and in mid to longer-term reduction in fuel poverty (albeit, other external factors are key here).

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.

Vulnerable households (e.g. elderly, those with learning difficulties) may find it difficult to understand and operate new systems, measures and standards and to appreciate the benefits or relevance to themselves. Appropriate advice and support should be provided to suit individual circumstances and landlords should have an effective communication strategy in place (in partnership with any appropriate support services/carers). Initial increased costs to tenants should be avoided/minimised and clearly explained and installations must not be overly intrusive or disruptive.

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.

Increased access to grant funding and/or heating allowances for vulnerable households living in hard to treat properties could help in certain circumstances. Applying standards to social sector only, will disadvantage many of most vulnerable households who tend to occupy private sector housing. Within social sector, costs are likely to be pooled across all tenants if additional rental income is required.

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

Meaningful information on cost benefits and appropriate benchmarking data on bills and consumption would contribute towards raised awareness/interest and necessary culture/behaviour shift. Additional resources for new approved & easy to use/understand technologies in addition to smart meters, is essential.

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

Helpful X Unhelpful

Case studies can be useful and practical ways to promote understanding of specific energy efficiency measures and their effects on property ratings. Positive examples for problematic, hard to treat/non traditional properties would be beneficial. Ultimately, case studies can aid landlords to assess, plan and implement activity and investment within a strategic framework.

If you think they are helpful:

Question 8 (a): Are these the right range of dwelling types to be represented as case studies? Yes X 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 X No

Question 8 (c): If yes please state type and say why you think they should be included?

As noted above (Q.8), detailed modelling work on non traditional & hard to treat properties should be developed as a priority issue.

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

No informed view on these methodologies.

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.

We understand that the 1990 baseline is based on unwarranted assumptions and therefore data may not be accurate.

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

Yes No

Unable to provide competent comment on this issue.

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

No comment

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?

No comment

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 agree that the Environmental Impact is most relevant for government priority of carbon reduction (which this council supports in principle), however, in practice the major issue for both landlords and tenants will be maintaining affordable heating and achieving cost savings and therefore Energy Efficiency rating is more meaningful.

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 X No

See above (Q.12)

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 X

If yes, please explain why.

This Council does not retain stock however we would not anticipate significant issues for our local RSL partners in this area.

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 X 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 X No

Other property types may be equally as hard or even harder to improve with energy efficiency measures.

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

There are significant issues with hard to treat properties in remote rural and island locations and achieving the 2030 timescale crucially requires commitment of adequate resources.

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 X

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?

In principle, the standard should apply to all individual homes, and hard to treat properties must be included. However, it should be acknowledged that some of these properties are unlikely to achieve the standard and deliver relevant savings within available resources.

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

We agree with the view that substantial (disproportionate) investment is required to treat non traditional properties and to avoid fuel poverty for tenants, however, provided sufficient funding were to be made available, these properties could achieve the same standard as all other properties.. The proposed approach may be most practical & relatively easy to implement, in lieu of more refined approach for these properties (but would reiterate previous caveat regarding apparent quality of 1990 baseline data in this context).

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?

The Climate change target does not take account of the practical variations in housing property types and may prove unrealistic/ unfeasible for a proportion of social sector stock. Imposing this blanket target could adversely impact on other equally important strategic housing objectives and targets.

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

Exemptions could include historic/listed buildings and others which will need to be assessed on a case by case basis. It is also likely in this authority that owners in mixed tenure blocks will continue to pose problems for RSLs seeking to make common improvements and therefore abeyances may remain necessary in these circumstances.

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

Schemes such as UHIS have made useful contribution but in this authority uptake has been localised and often restricted due to the unsuitable property types. We remain uncertain about the benefits of the Green Deal at this stage (and wary of the government's assumption of achieving the promised but non-guaranteed £200m), and are also very concerned regarding the feasibility of benchmark grant figures for green/silver standards for RSL new build within the AHSP. Less emphasis on "innovation" for its own sake and on the discontinuity of challenge fund initiatives would be welcome and more concentration on providing adequate resources within consistent, mainstream budgets would be more positive way forward.

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 set out in the consultation document does cover the main assistance available (albeit, this is already out of date and as noted above makes assumptions about potential resources which are by no means guaranteed). There is a need for further detailed cost analysis, particularly of the measures required for most problematic, hard to treat properties before any reasonable assessment can be made on the disproportionate costs of delivering the standard. It remains likely that tenants could bear the burden of these proposals through increased rent levels. In this authority, substantial investment has been secured over a number of years via stock transfer to support the new RSL's Business Plan however even so, the SHQS remains an extremely challenging (& potentially unobtainable) target.

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.

We are fully supportive of equalities policies that promote greater participation of females within the construction/retrofit industry, however we are unclear as to the pertinence of this question in the context of this specific consultation, over and above the standard requirements of equalities legislation and good practice in general. Better promotion of the

construction sector (& relevant information & advice services) within schools and early education generally might improve interest & uptake of available jobs & apprenticeships across all under-represented equalities groups, including gender; while more flexible work arrangements within the sector might help to encourage wider involvement by females.

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

All social landlords should maintain detailed stock condition information which is likely to provide superior intelligence to that gathered for the SHCS (we are particularly concerned about representative sample sizes for this authority within these national surveys) and it would be useful if this could be coordinated & collated for use by local authorities as part of the HNDA/LHS process.

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 X No

Social Landlords already report to SHR on SHQS and other performance standards and it seems practical and sensible that this should continue with the proposed standard. Additional bureaucracy should be avoided.

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

Yes X No

Introducing & monitoring new standard is likely to incur additional costs associated with building in house capacity and/or commissioning consultants; updating/revising IT systems; preparing funding bids & securing requisite investment etc. Costs will include staff/time as well as finance.

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

Yes X No

Proposed schedule of milestones would be appropriate and reasonable.

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

Yes X 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.

This council transferred its housing stock in 2006 and no longer has a landlord function however as the strategic housing authority, working in close partnership with local RSLs, we do retain a keen interest in this issue and welcome the opportunity to contribute to the discussions. The attached response focuses on those questions which are most relevant to this authority and includes the Respondent Information Form. We are happy for this response to be published on the Scottish Government website and will be available for future contact on this matter if required.