

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.

Comments

Clackmannanshire Council has established an Energy Efficiency and fuel debt Team to help eradicate fuel poverty and improve energy efficiency within domestic properties. The service is available to every resident of Clackmannanshire. Advice ranges from General energy efficiency to renewable energy advice and from Energy bill checks to full Fuel Debt advocacy services.

It is considered that this is now an essential service and falls in line with the proposed duty that will be placed on Social landlords. However, funding for this initiative is due to run out at the end of this financial year and with present cutbacks it is unlikely that we will be able to continue. Much needed Government funding would assist us to main time this lifeline for members of our community.

Contact Details:

Lawrence Hunter, Home Energy Strategy Officer, Community and Regulatory Services, Kilncraigs, Greenside Street, Alloa FK10 1EB
Tel: 01259 452981
Email: lhunter@clacks.gov.uk

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?

Comments

Access issues

Owner Occs failing to comply/participate with common works

Individuals not convinced of benefits

Lack of incentives for Private Landlord when they can get the same rent without providing the measures

VAT at 20%

What could be done?

Private sector regulation

Introduction of minimum standards

Financial assistance for owner occupiers to comply with standards

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

Comments

We have experienced a great deal of difficulty in improving properties in mixed tenure estates. Our Home Energy Strategy Officer has utilised available Scottish Gov. funding where possible but there are still situations where we have been unable to proceed with work due to lack of co-operation (mainly associated with inability to pay for works by owner occupiers)

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

Comments:

- Utilisation of existing government Insulation and energy efficiency initiatives.
- Awareness campaigns and publicity on websites and facebook
- Private Landlords Forum
- Energy Efficiency Team

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 ✓

Comments

A recent consultation exercise on our local Housing Strategy highlighted that energy efficiency was seen as key priority for residents of Clackmannan.

Our local tenants forum and community groups have all raised energy efficiency as a primary concern

Energy efficiency education = lower fuel bills

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

Comments

It is felt that it is important to incorporate a commitment to provide an energy

efficiency service within the standard as lack of education and advice is still a key factor in high energy bills and the misuse of energy. Which in turn has a major impact on fuel poverty and climate change strategies. The wider benefits of better health, the impact on a child's education, social inclusion and of course Fuel Poverty are also key areas that need to be included.

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

Comments

How can we increase awareness? ----- Via initiatives such as Clackmannanshire's Energy Efficiency and fuel debt team.

Education in schools and also awareness raising at residents and community forums.

N.B. Any imposition of a duty will require to be backed by realistic funding to assist local authorities to meet their duties.

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.

Comments

The vulnerable in the community (the elderly, the disabled, those with mental health problems and also those with addiction challenges etc.) will always require additional assistance. Experience has shown that those most vulnerable require support to participate in schemes or tend to refuse access or simply opt out.

Disabled households are identified as a group who have substantially higher fuel bills due to their need to keep warm. Perhaps a higher efficiency standard with financial support would be appropriate for this grouping.

As mentioned in the consultation document. Although this exercise concentrates on social housing the need to consider owner occupiers and private rented sector tenants is necessary to assist local councils and social landlords to undertake energy efficiency measures in mixed tenure estates. In this instance our concerns are:

- that private rented sector tenants may experience challenges with their landlords which may be reflected in the raising of rents
- as with social landlords, the most vulnerable will suffer due to lack of advice and support
- lack of financial support/initiatives will result in further opt outs

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.

Comments:

As above

Solutions:

There need to be a commitment to apply the standard across all house types to prevent double standards

Commitment to establish Energy Efficiency and advice teams to assist the vulnerable and those in fuel poverty to become more aware of support and financial incentives to carry out works.

Provide grant funding and/or specific heating allowances for those in hard to treat properties.

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

Comments:

- Awareness campaigns
- Establishing Community Energy Champions
- Establishing a service that carries out regular audits on energy use by tenants to assist them become more energy efficient
- Smart Meters
- Partnerships with NHS, SW and Education services to raise awareness.
- Partnership arrangements with Energy companies to identify: individuals in fuel debt, those with pre-payment meter payers
This would allow us to focus on those in most need
- Sharing of Benefits data with Energy Advice workers to help identify those potentially suffering from fuel debt. Experiencing of attempting to identify PG and SPG clients highlighted the substantial challenges in obtaining useful data that could assist in establishing energy efficiency schemes.
- The provision of local funding to maintain energy efficiency initiatives operated by the local authority

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

Helpful ✓

Comments; Non Trades and HTT properties case studies required sooner rather than later

If you think they are helpful:

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

Comments:

In stating No. This is merely to reflect that we need to cover all non –trad properties. The more examples available the better

Question 8 (b): Are there any other types (including hard to treat) that you would like to be included as a case study? Yes ✓

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

Comments:

Swedish Timber
Blackburns
Crudens
Weir Multicon
Dorans
No Fines
Weir Timber

Due to specific peculiarities of these properties it would be useful to have a profile to help determine specific requirements

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

Comments

On the basis that SAP/RdSAP is constantly reviewed and updated it is considered that this may be the best option available at this point in time. It would be interesting to see an element of Thermal imaging being introduced (e.g although records may indicate the installation of cavity wall insulation some 20 years ago this does not reflect that the insulation may now have slumped and in fact be the cause of cold bridging and dampness) and consideration given to the fact that cloning of properties in some authorities is not always accurate. The one challenge that needs to be addressed is locality, which can have a

major impact on the ability to heat a home

Question 10: Do the 'Baseline: 1990 Measures' accurately reflect the energy efficiency performance of dwellings at that time?

Yes ✓

If not, please provide details.

Comments

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

Yes ✓

Comments

All will be dependent on funding and assistance available to reach these standards

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

Comments

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?

Comments

- Upto date EPC Certification – following the completion of any energy efficiency works It would be useful to have an updated EPC to reflect the changes. This would allow for future improve programme modelling
- Energy Efficiency Advice Visit Measure – Providing a commitment to energy efficiency advice for tenants. This could state dates completed and programme of reviews
- External Wall Insulation

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 ✓

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 ✓

Comments

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 ✓

If yes, please explain why.

Comments

Anomalies have already been identified in our existing data due to tenants not reporting insulation improvements and we are constantly reminded that early cavity wall insulation schemes suffered from lack of expertise which is now culminating in failed cavity wall insulations leading to dampness and cold bridging.

An up to date thermal image of our properties would be useful in identifying where works are required to resolve failed installations and EPC updates for every additional measure reached would help us to map developments and identify areas requiring improvements.

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 ✓

Comments

In some instances very challenging particularly if we consider owner occs in blocks of flats and maisonettes. High cost could create further opt outs

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 ✓

Comments

This would appear to be based on cost saving rather than an initiative to improve energy efficiency and tackle fuel poverty. The Government needs to assist us to improve the EI and EE in all properties to the same level or suffer failings in flagship policies on fuel poverty

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

Comments

If we are serious about tackling climate change and carbon reduction we should be aiming to maximise the use of renewable heat sources, district heating and investing in the development of such sources. By always opting for Gas and Electricity as a solution we may be setting our tenants up for ever increasing bills and the prospect of them falling into fuel poverty. Local authorities should always keep in mind the future need for fuel security and the Government should assist where possible to ensure this occurs.

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?

No ✓

If yes, please explain which option you prefer and why.

Comments

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?

Comments

YES

Given appropriate funding and support this should be practicable. Failure to

do so would result in many people remaining in fuel poverty.

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?**

No

Comments

This, on first review, appears to be complex and open to interpretations that may not be to the long term benefit of tenants. Non trad properties require specialised solutions which on the whole are expensive. Local authorities will be looking to the GD and ECO to help in these instances.

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

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?

No

Comments

This is a qualified NO as we will still face problems with opt outs from owner occs if regulation and financial support for them do not change.

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

Comments

Apart from the existing Government and Energy Company schemes there are little other funding schemes appropriate for a small authority such as Clacks.

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.

No ✓

Comments

It is too early to comment on Green Deal and ECO and their ability to assist landlords meet these new commitments. The impact of Green Deal on Council tenants and the consequences of a tenant signing up to a Green Deal lead to many questions which appear yet to be unanswered.

The installation of renewable technologies still (in many instances) requires a large initial outlay that local authorities are finding difficult to fund in times of cut backs and budget pruning

The RHPP and Communities Competition are welcomed but on the basis there is a competition for the funding, the initiative is self limiting. In many instances the most needy in the community miss out because of lack of resources to complete bids. With so many schemes and competitions it is difficult to find the resources to cope, which is detrimental to our communities.

European funding is not always available to the smaller local authorities and the interest rate tends to be higher than PWLB.

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

- Raising awareness of gender equality and jobs available in the industry.
- Promotion through schools and other educational establishments
- Contracts that indicate requirement for gender equality
- Promotion via modern apprentice scheme

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

Comments

Clackmannashire Council is currently developing a GIS based Heat Mapping and Fuel Poverty database which will potentially help monitor the

new standard

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 ✓

Comments

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

Yes ✓

Comments

Database and IT resources and of course staffing resources..

Cco-ordinating schemes with communities and managing tenants energy efficiency (to mention but a few) are impacting upon the ability of smaller authorities to meet existing commitments. The costs of establishing a specialised team need to be taken into account if we are serious about being proactive in improving energy efficiency, eliminating fuel poverty and reducing carbon emissions.

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

Yes ✓

Comments

Those specified in the consultation document would appear appropriate ie. 2020, 2030, 2040, 2050

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

Yes ✓

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

As already mentioned the formal establishment of an energy efficiency service/team within each local authority would assist in ensuring that EESSH dealt with and promoted equality issues.

Instruction/guidance and appropriate funding

A properly formed team will provide major paybacks in carbon reduction , energy efficiency and the reduction of numbers in fuel poverty. A case of spending to save the environment and the community.