

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 ✓

Question 1(a): If 'yes', please provide details, including any web links/contact details you may have.

DGHP has a long history of acting as pioneers in addressing energy efficiency measures within its homes. Three examples are;

Block 1-7, Municipal Terrace, Dumfries – Probably amongst the oldest Social Homes in Scotland built 1913 – The block comprises 8 1bed tenement flats. For 4 of these homes we achieved 2050 carbon reduction target of 80% incorporating PV panels, Green roofs, external walls have external insulation, cavity fill and internal insulation, Underfloor heating, air tightness, high spec doors and windows all added to our “green” learning experience. Whilst proving that it can be done it was at a cost that is unreasonable for RSL to fund alone.

Rural Homes Energy Efficiency & Affordable Heating – DGHP could have used high cost as a get out of jail card (SHQS) for these rural off-gas-grid homes. Instead it committed to offer ASHP and other renewables to these tenants. Alongside the “green” equipment we ensure that we treat each home in a holistic way (loft cavity fill) maximising CERT funding and benefit take up.

CESP rural zone - one of only a handful of truly rural CESP zones in the UK this was used as a starter for our Rural Homes Energy Efficiency & affordable heating Programme and includes Isle Street where every home has an ASHP perhaps the only street in the UK.

Question 2: For landlords, what is the greatest cause of SHQS abeyances in your stock? Is there anything that the Scottish Government could do to assist in reducing abeyances?

Do you mean exemptions “not possible to meet standard (SHQS) for technical, disproportionate cost or legal reasons” or abeyances which are generally “social reasons” – If you mean abeyances then the greatest cause of SHQS abeyances is undoubtedly tenant refusals.

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

We have only had positive experiences of improving properties in mixed tenure blocks. It helps that grant funding all be it means tested ensures quick buy in from

those owners qualifying for 90+% grant. You have to ensure open honest communication and wait, and wait and wait. You also have to know when to walk away. Make the process as easy as possible and don't expect to recover all your costs.

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

Factoring is the first step without it little chance of success.

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 ✓

It's a priority for all forms of people looking to rent homes not just tenants in social housing especially in the current economic climate.

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

Yes potential benefits broadly right.

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

Awareness campaigns for all not just tenants – it's also good to practice what you preach! (not just Government but MSP's as well)

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.

Our experience shows that even when homes are well insulated and have an energy efficient boiler, tenants income still may mean that system go unused so any low income groups may not get the full benefits intended by the new standard

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.

No comment

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

Roll out of smart meters across Scotland in half the planned time or targeted to social housing or areas of deprivation.

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

Unhelpful as they stand ✓

They started off as a great idea but have grown into models and not case studies – need to go back to basic include 1990 Tonnes and build real case models including changing fuels from electric to gas.

If you think they are helpful:

Question 8 (a): Are these the right range of dwelling types to be represented as case studies? Yes ✓

Given that they are the most common types of social housing (according to SHCS) they most probably are but it would be useful to see what HA formed in the 1990's see as common types.

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?

BISF and some of the other non-trad homes. Should also include SF, Oil and LPG to help rural RSL and other landlords.

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

It's the best we have and have to accept its limitations and work to improve it.

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

No ✓

If not, please provide details.

No, I arrived in Dumfries in 1990-91 electric and Solid Fuel were the norm for heating in this area, we started to offer partial gas heating in 1991 and it was not until 93-4 that full gas systems were being installed. Your baseline should start from the use of electric or Solid Fuel not GAS.

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

No ✓

Having 2050 advanced measures is unhelpful as are some of the 2020 in that they are unrealistic – you seem to try and achieve meeting the target when in fact most of the case studies fail both 2020 and 2050 - it should be much more a generic column that plants the seed what else can you do when undertaking work e.g. Heating add undertake epc and possibly look at including loft, underfloor or cavity fill – get some feedback on DG in social homes how many social homes still have single glazing? Also under Sedbuk no boiler under SAP 2009 has a rating of 90.9 best is only 90.3!

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

Low energy lamps our experiences is that's it is rare for 100%, PV on roofs should not be included nor solar thermal for hot water.

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 and NO ✓

If not, please explain why.

However, Heat loss is the key and you should re-look at dwelling types based on number of external walls – Semi-detached have 3 external walls, so do End Terrace homes, bungalows, 4-in-a-block flats and end flats – all could have single target

Why should social housing take this hit? Figures already indicate that housing has achieved a 49% reduction since 1990 and social housing has lost over 300,000 homes. In the Use of energy in the home report (SG) it states a saving of 37% over 1991 CO₂ emissions, report covered period to 2010.

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?

No ✓

How likely is this going to happen and in what type of homes? The idea is sound but the RDSAP rating is what it is.

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.

It depends on final system, we will have to reclassify some fields and capture some data – it would help if you could developed an easy individual RdSAP tool that we could use to model improvements rather than using draft epc.

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 ✓

For Gas heating they are and will require all RSL to implement a plan for replacement for the vast majority of its gas systems. For Electric heating it is too challenging to achieve using storage or wet electric systems these need to come down to below SHQS levels.

Question 16: Do you think the suggested energy efficiency rating for electrically heated detached homes and bungalows undermines the SHQS? Please explain your choice.

No ✓

It's a reflection on how bad the targets (SHQS) were for non-gas homes and can only hope that this approach also applies to the other electrically heated homes in the new standard.

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's too early to say for many reasons; expansion of gas mains, drift away by tenants from rural areas to towns, RTB sales , lower and aging population you may also put local rural companies out of business who currently deliver LPG, oil etc.

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.

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, as again the drift south to larger HA will come north and many RSL already operate in different locations – it may be useful for RSL to generate an average SAP score for their stock (if they had energy tool) as a guide only. Use of HEED database would also give area rating.

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 ✓

Too simplistic – why not use case studies? - look to building regulations to force major improvements or rationalising of poor energy performing stock. We as RSL need to look long term both at income and expenditure – 2020 is short term when setting standard.

Question 20(a): Do you agree that the percentage reduction for **unusual dwellings should correspond to Climate Change targets and be set at 42%?**

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?

As close to 80% as is reasonable possible get into the habit of achieving long term goals

Question 21: Do you think that there should be exceptions to the proposed energy efficiency standard? If so, how should they be treated?

Yes ✓

Identified and case by case made by the RSL to a working group to exam in detail why they cannot reach the standard. Costs alone should not be a qualifying reason.

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

Scottish Government? Local Council via grants!!!

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 ✓

Define disproportionate costs, For many RSL and Councils with rural stock the standard may be a step to far even with RHI

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.

Perhaps a bit old fashioned a view given the vast improvement I see at our local technical college but as always we can all do more especially target one/two man bands.

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?

No ✓ not SHR

HEED is the most appropriate tool to monitor the standard the only problem is that it should rest within Scottish Government not EST would not want to see EST handed long term contract and that it will need to develop to know each RSL social homes owned.

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

Yes ✓

The only way of proving a property passes the new standard is with a current EPC showing environmental impact rating – does this mean that all social homes need to have a current live EPC by 2020?

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

Yes ✓

2025, 2035, 2040, 2045, 2047 and 2049

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

No ✓

We need to know how to achieve 2050 targets as early as possible and build them into Building Regulations and encourage RSL and others to set own interim targets

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

Consultation Response Energy Efficiency Standard 4 Social Housing

I enclose our response to the proposed Energy Efficiency Standard 4 Social Housing. Overall we welcome the proposed energy efficiency standard and its intentions to reduce in line with Scottish Government commitments Scotland's carbon emission reduction. However, we have some concerns;

- Some of the minimum Efficiency Impact Ratings proposed in the consultation document may be unachievable within the proposed timescales (especially for electrically heated homes),
- The common broad house types could be rationalised and grouped more closely around heat loss (amount of external walls) and,
- Whilst welcoming Scottish Governments recognition of lower electric heating rating targets for detached homes, we would hope for further reductions in the other electrically heating house types as the costs of meeting the energy efficiency standard for RSL with off-gas-grid homes may be unaffordable for many.

We have included under the appropriate question on your respondent information form our individual comments.

We have highlight also our understanding that Social Housing has already achieved carbon emissions saving in excess of the 2020 target and the loss of some 300,000 social homes (regeneration, demolition or sales under RTB) since 1990 must also help in the sectors reduction in energy use and emissions. The recent report from the Scottish Government "Energy use in the home" stated a 37% savings in CO₂ emissions has been achieved since 1991. The question we would ask is there a need for the legal standard?

We will also respond to the Scottish Governments consultation on its proposed Sustainability Housing Policy, where we will highlight the

delay, until post 2015 of setting up any minimum energy efficiency standards in the private sector (even the min SHQS) and our concerns that this will further distance the inequality of accommodation between the private and social rented sectors.

We would hope that any purposed monitoring system by whoever is appointed would be kept as simple as possible and not involve us or other RSL with costly IT system replacement or increased survey or management costs.

Finally, we would seek clarification of when (if) in 2020 the EES4SH will apply (1st January, 1st April, 1st September or 31st December) and what happens where for whatever reason a social home is void and does not meet the standard can we relet (in short is this a legal standard or not)?

Yours sincerely