

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.

The Council is in the process of carrying out external insulation works to its own 'no fines' properties in a mixed tenure estate and has put together a package for private owners to significantly reduce the cost of these works for them. This includes; UHIS grant, CERT / ECO grant and the opportunity to benefit from the competitively tendered price secured from the contractor, in addition to design, quality and project management services. In most circumstances the householder will be able to apply for a 0% loan from the Energy Saving Trust for the balance of the works.

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?

ELC only have SHQS exemptions for energy efficiency in off gas areas and for properties of a non-traditional construction. We are improving the thermal efficiency of these construction types but this is expensive. In off gas areas we are installing renewable heating systems in these properties.

For off gas areas we are looking to address the heating system, to switch fuel source to air source heat pumps. Funding for this project is unclear with ECO and RHI and RHPP being available on a competitive basis, or in the case of RHI uncertain if it will be available at all. Security of funding stream would assist in planning to meet SHQS in this area.

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

East Lothian Council has some properties that share walls and roofs; in four in a blocks or tenements. There have been barriers to fitting insulation as East Lothian Council always looks to install standard, cavity and loft insulation measures where possible, but some owners have been reluctant as they do not want to meet the cost share.

Where the Council is a minority owner in a mixed tenure block the results have been mixed. Some owners are happy to participate in the projects but the majority decline.

There has now been significant success when installing measures where substantial grant assistance/support is available, for example through the

Universal Home Insulation Scheme (UHIS), which is now available across the district. From our records (which still have some data gaps), there are very few of these properties now 'blocking' and most have now been filled.

The Council has carried out external insulation and render to its 'no fines' properties, in order to meet SHQS. Where carrying out external insulation works on mixed tenure estates, the finished row does look patchy, however this is only an aesthetic problem and does not affect the thermal performance of the building.

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

The offer for private households in the example described in response to question 1 works with owners on a mixed tenure estate. The process of taking this offer to private households is not complete but uptake of the offer would appear to be around three or four households out of around forty. Even though this is not a true 'green deal' offer, it explores many of the principles and it is far more beneficial to the householder than anticipated standard green deal offers that will come forward for external insulation works.

In this scheme the private sector benefits from procurement exercise undertaken by social landlord. In order to minimise risk to the social landlord the offer could be structured in a way that the householder directly contracts with the installer. There are other associated risks (reputational and ensuring value for money for the social landlord) to consider but this is something worth exploring further.

The East Lothian Energy advice centre provides information and advice across the county irrespective of tenure.

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

There appears to be a mixed response from tenants on this. From our experience of installing air source heat pumps in off gas areas, around 30% of tenants who are eligible for the systems, have opted to take up this offer. The remainder would prefer to keep their existing system. This is for a mixture of reasons. For example a tenant who purchases fuel for their open fire would see a decrease in cost with a new system, there are however some tenants who are able to obtain fuel from free sources and therefore would not see a reduction in their bills. Other tenants are used to their system, like their focal point open fire and would not want to see it replaced.

For one new build housing development we have installed a weather compensator to regulate the heating system, which means the radiators are only called upon if the internal temperature is below a certain level. The properties are insulated to a very high standard meaning that even when it is cold outside, the radiator will not be called upon. Most tenants are used to immediate heat from radiators when cold outside and become frustrated when these are not activated. In some situations this weather compensator has been removed. On this same development other tenants see the benefit of this system and do not try to alter the settings or system. This example illustrates that tenants do not always want systems that reduce their carbon emissions or fuel bills. Information and education has been provided to tenants but there are significant challenges faced when confronted with the reality of changing existing behaviours and expectations.

A recent survey has been undertaken of tenants in relation to ELC rent policy. Almost 85% of respondents agree that those tenants who are allocated a new build house should pay a higher rent. Strong views were expressed that those getting new houses should pay more given lower running costs in particular. However the majority of respondents will not live in a new house and research has not been undertaken to find out if tenants would be prepared themselves to pay a higher rent for energy efficiency improvements to their own home.

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

Comments

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

The information provided needs to be meaningful to tenants. In general information on how to reduce costs is of more value to tenants than information on reducing carbon emissions. This could include clear information on the savings they could make from their actions or from investment proposed by the landlord. It is also helpful to provide practical information on how to make the best use of heating systems and highlight how the behaviour of household occupants can influence energy efficiency.

One of the main issues that requires to be highlighted is the level of expenditure on household energy use that isn't for heating and hot water. There requires to be a change in culture to reduce this energy usage in homes and the landlord can not be responsible for this element.

It is hoped that the introduction of SMART metering will assist with this, by clearly identifying the areas of expenditure within the house.

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.

Some older people and/or people with learning difficulties may find it difficult to learn to use new systems or measures. Installation of energy efficiency measures needs to be coupled with advice and support.

There is a danger for these households that additional costs could be incurred if tenants do not fully understand how to operate their heating system.

For example, showing someone how to operate a new heating appliance once it has been installed can prevent them from overheating their home and pushing up energy costs. There should also be a point of contact provided if the new system fails to meet energy and price performance targets.

As new technology is introduced and standardised, remote real time monitoring of system use will be able to provide information on performance and therefore intervene if it is shown that the system is not being used correctly.

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.

There is concern that the standard appears to be proposing a move away from an emphasis on running costs to focus on carbon emissions.

ELC supports the drive to reduce emissions but not if this risks increasing running costs for individual households.

There must be a realisation that reducing carbon emissions may place households at greater risk of fuel poverty.

The council support the proposal in the standard that any new work must at least maintain the current RdSAP rating for the property.

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

Smart meters which enable occupants to monitor energy use on a regular basis. Face to face dedicated energy advice projects such as the East Lothian Energy advice service.

However as more technology is installed in properties, more funding is required to sustain existing and allocate additional resource to cope with the demands this will bring.

As detailed in response to answer in question 4, cultural and behavioural change is required to reduce energy consumption and this will take considerable effort and resource. It must include assistance from organisations wider than social housing providers. As detailed in the consultation document smart meters will assist this but ingrained behaviours and expectations will continue to prevail unless resource into this area is made available.

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

Helpful Unhelpful

The case studies are helpful.

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

As a starting point these represent the majority of properties used by a social landlord. In time further case studies should be developed for non traditional, hard to treat houses.

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?

Comments

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

Social Landlords are already required to use this methodology to provide Energy Performance Certificates (EPC) and therefore this is considered to be the most cost effective method of measuring performance. However, EPC only require to be recalculated every 10 years and therefore the standard should take account of the changing methodology used to calculate EPC and set standards for each version of RdSAP.

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 have no evidence to suggest that these figures are not accurate and must assume this baseline contains the most accurate data available to measure against.

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

Yes No

In some instances yes, in other instances no. For a lot of house types the further measures seem to indicate internal insulation, which is disruptive and expensive. This work will be difficult to manage and it is likely this will put off a significant majority of tenants due to the disruption.

Based on current costs the addition of photovoltaics to appropriate housing is unlikely to be an option, particularly as this has such a minimal improvement to the RdSAP rating.

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

None

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?

It would be useful to have research that explores the contribution made by the mains gas network towards meeting the 2050 climate change targets. There is doubt over the long term viability of gas as a low carbon and cost source of fuel and because of this the East Lothian LHS 2012-17 LHS states that we will consider the effectiveness of extending the gas network.

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.

The Council recognises the importance of reducing carbon emissions. However, for social landlords, one of the key aims in improving energy efficiency is to ensure that tenants can live in a home that they can afford to heat. In general tenants will be more concerned about housing and heating costs than how much carbon the home produces. The Energy Efficiency rating would be more meaningful for tenants than the Environmental Impact rating.

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

We are encouraged that the consultation suggests that existing RdSAP should be kept as a minimum following any change of heating. If a minimum Environmental Impact rating is used it should have safeguards to ensure that measures installed are not decreasing the energy efficiency rating as this would result in tenants paying more to heat their homes.

As a general principle improvements should not result in additional costs for tenants. This relates not only to individual energy costs but also to the impact on rental levels.

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.

The Council has recently carried out a full stock housing condition survey which includes data on energy efficiency of the homes. It is also anticipated as more Energy Performance Certificates (EPCs) are produced over time the data will be available for the purpose of planning/implementation.

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

The ratings are very challenging and represent a huge increase in SAP ratings for flats in particular. Although East Lothian Council has relatively few flats, the cost of measures to meet this increase could be disproportionate and will need agreement from owners in mixed tenure blocks. In addition there are no ratings given as yet for non traditional stock, of which East Lothian Council has a limited amount but nevertheless

requires attention.

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

There are few properties of this type within East Lothian Council's stock, however across Scotland occupants could potentially be affected by fuel poverty. The constraints for energy efficiency improvements for these homes are no greater than for some other house types such as tenement flats. Detached homes and bungalows have more scope for measures such as ground source heat pumps which may not be possible for other house types.

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

As indicated in our response to 11b, more investigation is encouraged and required into the long term sustainability of gas as a fuel source, particularly in terms of its use as a low cost fuel source. Investigation and projections into the decarbonisation of the electricity grid would also be useful.

As discussed in the answer to question 4, there is reluctance from tenants to part with their solid fuel heating; especially as in rural areas a number of tenants are able to obtain fuel from free sources.

As mentioned in relation to Q2 there is uncertainty over funding sources for fuel switching going forward. The RHI, ECO and RHPP, in whatever form it takes, does not provide clear funding streams for councils to budget and therefore to switch fuel source to alternative means is difficult with this funding stream.

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.

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?

The standard should apply to individual homes so that harder to improve

properties are not left out of programmes. However, there should be a recognition that some properties may not be able to reach the rating based on the current options available to improve energy efficiency.

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

This seems to be a sensible approach. ELC does not have a particularly large stock of 'unusual dwellings' however, for those social landlords who do have, this could be a very resource intensive approach to target these property types.

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?

Although the 42% reduction corresponds to the target set out in the Climate Change Act, it would be difficult to justify if it led to excessive costs in meeting this target, which could be passed on to tenants through rents or higher fuel bills.

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

There will inevitably be some properties that cannot reasonably be brought up to the EESSH, for example listed buildings.

As outlined in questions 4 above there are many situations where tenants do not agree to works being carried out and the social landlord has to wait until the tenancy ends, and in addition to ensure appropriate trigger points are built in to carry out the works at this time. There may also be situations where owners do not agree to common improvement works.

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

No other relevant sources known

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

Some hard to treat properties will cost more for tenants to run (potentially placing them in fuel poverty) and they will require extensive internal insulation programmes, which will be at a higher cost than discussed in the consultation document.

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.

East Lothian Council welcomes initiatives that can readdress gender inequality in this industry. Where the Council is procuring a service and where procurement and employment rules allow, initiatives that support employment of female workers could score positively within tender evaluation.

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

HEED should be updated more frequently and with greater array of information included. For example, data held by social housing providers could be added to the database, in a format that allows for cross authority comparison.

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

The SHR monitors compliance with SHQS and it would seem appropriate that they continue this monitoring role

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

Yes No

The latest information is that the costs associated with lodging an EPC are increasing. The consultation states that the cost of EPCs is around £30, however it is understood that in some areas, particularly rural areas this cost can be higher and if the new version of RdSAP is more onerous to collect and record, such costs may increase.

There will be increased resource required if information on 100% of stock is required at an individual house level.

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

Yes No

Regular milestones to measure progress to achievement of the target seem sensible with every ten years as promoted in the consultation document.

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

Yes 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.

No comment