

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.

There are many associations in Glasgow developing innovative projects to address energy efficiency in their housing stock. The following are just a few examples:

- **Commonwealth Games Village** – developed through the City Legacy Consortium for Thenu HA, GHA and West of Scotland HA. The project included district heating, solar panels, off site construction, air tightness and high levels of thermal efficiency within the buildings. The weblink is www.citylegacy.co.uk/Home/VisionLegacy.aspx
- **Cube Housing Association's Combined Heat and Power System** – Cube Housing Association have developed a combined heat and power system for their Wyndford Estate. The weblink is www.cubehousing.co.uk/WhatsNew/CombinedHeatandPowerSystem
- **New Gorbals Housing Association** is developing a biomass district heating system. The weblink is www.newgorbalsha.org.uk
- **GHA** is developing a combined heat and power system at Ibroxholm Oval.

Glasgow City Council through Sustainable Glasgow is examining a number of options for large scale district heating. The council has already entered in to a contract for the provision of a waste to heat plant at Polmadie with the intention of using surplus heat to support district heating.

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?

N/a – Glasgow City Council does not have any housing stock, but information from other landlords has indicated that issues of funding and common ownership are the greatest barriers.

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

There are many complications carrying out work on mixed tenure estates including:-

- Private landlords or owners unwilling to participate
- Owners not happy with the specification of the work
- Obtaining owners contributions
- Maintaining the improvements after completion of the work

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

GCC have assisted housing associations where possible to improve properties in mixed tenure estates through various funding mechanisms such as private sector housing grant, missing share, Universal Home Insulation Scheme, CESP and CERT. Housing Associations have been assisted in larger projects by GCC serving works notices to encourage participation.

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

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

They are broadly the correct "potential benefits"

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.

No

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

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

The focus of Glasgow's Home Energy Advice Team (GHeat) is to deliver face to face advice on energy related issues to vulnerable households in the city regardless of tenure. This includes issues such as getting the most effective use from heating systems, ensuring that householders are on the best tariffs, helping householders understand utility bills and providing an

advocacy service in terms of dealing with the utilities. The project has been developed through Glasgow's Fuel Poverty Partnership. To date, advisers have visited over 4,800 households and delivered in excess of 3750 tons of lifetime carbon.

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

Helpful Unhelpful

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

Although a multi storey would be considered flatted, it is a distinct house type with particular expensive to treat requirements.

There should be recognition of the number and variety of Non traditional housing which is likely to come under the heading of hard to treat. There are 40+ different non traditional house types in Glasgow ranging from timber houses to approximately 6 types of defective house types under the 1985 Housing Act. Recognition has to be given to the defective non trad properties which may require additional work before any energy efficiency work is carried out and the cost effectiveness of doing this.

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?

Multi Storey Flat – as above

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

There are some benefits to using RdSAP and especially from Oct 12, when the new V9.91 version is introduced. This will include more improvement measures, location factors and wall specifications. There are however still some limitations and properties using certain fuel types (biomass/LPG etc) or certain house types (Detached, non trad, solid wall) which may still score lower on this system despite being highly efficient. Another concern is that some high scoring measures may not always be the most appropriate way to retrofit a tenants home.

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.

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

Yes No

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

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?

Consideration should be given to the additional costs of doing measures such as decant costs etc

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.

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

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.

N/A – GCC does not have any housing stock

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

GCC does not consider the ratings to be suitably challenging. If the standard is set too low, then landlords will carry out the minimum to achieve the standard rather than consider the most appropriate solution for the property as a whole. We have already seen evidence of this with the current SHQS. Electric heating systems that were installed to achieve the 2015 standard are now being replaced as it will not achieve the new standard. This is double the cost to tenants and double the disruption. A strategic view should be taken of the ratings and set at a level which encourages high standards and is acceptable for the future.

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

Yes this does undermine the SHQS. The energy efficiency rating for the SHQS was always considered low and therefore to propose a standard which is lower will undermine the government's vision of setting a rating that is challenging to landlords. It should not matter that detached/bungalows represent less than 1% of the stock. What should matter is the ability to address fuel poverty within the housing stock regardless of house type/heating type and the level of comfort and affordability offered to tenants that live in these properties. Strategically it sends out the wrong message to landlords.

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 is likely that this will be the case but each individual circumstance will have to be considered on its own merit. There may be difficulty in achieving this in some rural areas.

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.

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?

GCC agrees that the standard should apply to all individual dwellings and not be aggregated across the landlord's stock as this will provide a minimum standard across the whole stock. We believe that this is achievable.

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

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?

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 may be some properties where it is more difficult to achieve the standard. These properties should not be completely exempt but rather landlord should have to produce an action plan stating how they will treat the properties and within a reasonable set timescale.

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

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

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.

There needs to be discussion with the construction industry about this and this needs to be balanced with keeping existing construction workers in employment in the current economic climate.

Question 25: Are there any other data sources you could suggest to monitor the proposed energy efficiency 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 No

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

Yes No

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

Yes No

We would suggest that regular milestone be set at 5 year intervals.

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

Yes No

No there is a need to set the long term strategic direction which will influence investment decisions by associations.

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.