

**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  No

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

Link have, over the past few years invested considerable resources in developing mechanisms and procedures to address energy efficiency both in design and in use by tenants.

Link has over the past few years carried out significant retrofit insulation and gas boiler replacement programmes utilising CERT funding and continue to do so until the completion of the funding. We will then be looking to adopt the new Greendeal and ECO to further develop and extend these programmes.

All replacement gas boilers fitted by Link are of a minimum of A rated to help with reducing tenants running costs, Replacement doors and windows are of a high thermal efficiency, and Link development team are developing system builds utilising off site construction techniques to both speed up construction, improve energy efficiency and thermal insulation standards, and help develop innovative methods of construction.

Links newly revised design guide builds on the above, and allows architects and designers more freedom in construction methods and designs to achieve highly insulated, innovative technologies but within certain financial constraints highlighted by Link.

Other energy efficiency works Link have undertaken over the past three years includes the installation of two large CHP systems serving a number of residential properties and a biomass boiler serving student accommodation in Stirling. Both these systems have been extremely successful in reducing tenants running costs for heating and hot water production, and electricity generation with regards to the CHP units.

Other associations have also been developing similar technologies and construction techniques such as the Housing Innovation Showcase in Dunfermline by Kingdom Housing Association. This project modelled a number of house types of various energy efficiency standards, which are now being monitoring for energy consumption following occupation by individual tenants. This monitoring, as we understand will be carried out over a 12 month period.

**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?**

Link have been pro-active in minimising the numbers of abeyances within our stock; However, due to constraints regarding build type and size, these

are unfortunately unavoidable.

The majority of the problems centre around achieving heating standards, principally caused by planning restrictions which can, in some circumstances determine the proposed location of gas flues, especially in listed properties or properties within conservation zones. The location of a gas boiler can also be restricted due to the internal configuration and room layouts which may restrict access to an external walls.

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

Where mixed tenure properties are concerned, problems exist in owners buying into various planned works, especially where they see no significant benefit to them.

Problems specifically lie with gaining owners consent, ownership rights, title deeds, or just a general unwillingness to cooperate with the landlord on whole refurbishment programmes.

This becomes more problematic where we wish to carry out cavity insulation works where sub-division of cavities is not possible or loft insulation works can't be carried out due to access issues.

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

Link has endeavoured to include owners in all of its projects on mixed tenure buildings and have been successful in including owners in CERT funded 4 in a block loft and cavity wall insulation projects.

Further, Link has been carrying out a significant gas infill contract to transfer properties from electric heating to gas. The infrastructure network has always made provision for owners within the scheme to connect to the new gas supply and advice given to owners regarding the assisted connection route offered by Scottish Gas.

Link will also examine the possibility of obtaining grant or financial assistance for owners on many of our projects, and this process was successful in a refurbishment contract in Glasgow where means tested grant assistance was obtained by Link on behalf of six owners in the building enabling the contract to proceed and saving owners a significant sum of money.

Where owners do not wish to engage in proposed contracts, we would, as a final option look to use existing legislation such as Statutory notices to engage and force owners to carry out certain maintenance or repair works.

**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

Tenants, because of generally low incomes wish to reduce runnings costs of their homes, and one significant way of achieving this is by making houses more energy efficient. This is reflected in Links Affordable Warmth Strategy and is a generic goal that Link aims to achieve throughout its annual planned maintenance contracts.

However, It is my view that owners tend to view energy efficiency as a last resort measure, wanting to prioritise more cosmetic / visual items first such as kitchens, bathrooms, painter work etc.

Insulation, by its nature tends to be a hidden element, which, although has an intrinsic benefit to the household, tends not to be seen as a priority item. This is further complicated by the fact that it has been very difficult to establish an accurate financial benefit to a home owner by carrying out certain energy efficiency measures. This will hopefully be made clearer with the introduction of the green deal and the associated assessment procedures.

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

Link has an Affordable Warmth Action Plan which highlights certain areas Link should be focussing on in order that properties are improved and to the benefit of tenants. The plan has 5 main areas:

- Identifying fuel poor households to target solutions
- Improving the thermal efficiency of tenants' homes
- Reduce energy consumption in the home
- Provide a range of support opportunities to increase household income for our tenants
- Ensure our tenants have access to energy advice

Focussing our priorities on these five key areas, the benefits to our tenants should include;

Health benefits to our tenants.

Cost reduction for fuel bills.

Sustainable tenancies.

Reduction in voids and an improved lettings demand from new tenants wishing to live in warm, attractive, and energy efficient homes

**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.**

We would consider that the introduction of this policy should not affect any particular equality group; However with welfare reform being introduced and its effect on reducing the levels of disposable income all tenants are going to have less income to use for energy bills and the importance of reducing running costs needs to be addressed where possible to reduce this added pressure on the more vulnerable in society.

**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.**

Improving the energy efficiency of a property should reduce the financial burden on tenants, ultimately providing them with a warmer and more comfortable property at a reduced running cost. However, it may be seen by some landlords that an increase in rents may be applicable given tenants will have reduced energy costs based on their previous bills. Landlords may consider an increase in rents to recover any additional capital outlay they have incurred as a consequence of the new legislation. It is our view that any capital costs involved in doing the improvement works should, where possible, not be passed directly to individual tenants and should be funded primarily by Government grants.

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

Link utilises the expertise of our in-house welfare rights team to provide advocacy and advice on energy suppliers, costs and assistance in switching supplier to get the best deal suitable to their needs. It may be worth considering the use of additional external resources to supplement this service; however, the installation of energy monitors or some form of visual display are particularly beneficial to tenants in understanding their energy use.

People in general do not appreciate the amount of energy individual appliances use, and as a consequence, how much they cost to run. Any visual display however should not only display the amount of energy being consumed but also how much it is costing based on current energy prices. Any visual display device should be supplemented by visits from energy advisers who can assist with interpreting the results and giving tenants specific advice on how to reduce costs specific to their own home.

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

Helpful  Unhelpful

Yes, case studies are always useful, however, they need to be based on real facts and be practical in terms of being achieved by RSL's or Local Authorities. Where Hard to Heat properties are used, for example, and it

would be totally impractical to carry out the works whilst the tenant was in occupation, then all the associated costs with regards to a decant etc. must be included within the case studies.

In addition, case studies and the property types must accurately reflect the stock that is in ownership by the majority or Landlords. Scale and costs must also be accurately reflected; i.e. where a block of 8 flats exists in a tenement type building, circa 1920, then a proposal for the installation of solar PV or solar thermal on the roof must take into account the maximum roof area required for all eight flats and not just a single flat. In addition, the practical considerations such as planning legislation and building control requirements must also be considered.

**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

Please see above for further clarification.

**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?**

The majority of the property types appear to include most property types owned by RSL's and L.A's. However, some that are not mentioned in the list are:

Solid wall cottages, pre 1919.

Properties generally having a listed status.

Properties generally located within conservation zones.

The importance of the conservation areas and listed buildings is, in our view critical due to significant planning restrictions being applied to these types of property. Restrictions currently include installation of double glazed windows and thermally efficient doors, double glazed roof lights, installation of solar PV or solar thermal on some roof areas ( depending on orientation ) and restrictions to undertake some internal works where decorative cornices may be involved and proposals may include internal wall insulation.

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

The principal of using these two systems is generally acceptable. However, RdSAP has limitations in its ability to calculate the true U Value of some building elements and uses many assumptions based on the age of the building being assessed. Further, it has limitations to take into account improvement works that may have been done since the property was first constructed such as the installation of cavity wall and loft insulation, under

floor insulation and draft proofing ( a significant cause of heat loss from older properties ).

The SAP methodology tends to be much more accurate; We understand however that the RdSAP software is being updated and improved to try to address some of the issues but this will unfortunately not resolve properties that have already been assessed using the old software which will almost certainly require re-assessment at a cost !

One final failing of RdSAP is that the current software only takes into account Heating and Hot Water production and fixed lighting outlets when calculating energy use for a building. The software does not account for small electrical appliances including dishwashers, washing machines, kettles, microwaves, lighting such as floor or table lamps and does not take into account any renewable energy systems fitted for the production of energy such as solar PV or solar thermal.

**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.**

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

Yes  No

Generally yes, in the majority of cases; However, buildings that are located within conservation areas or fall within a listed status may not be eligible for some of the measures proposed. This is evident with both double glazing installations and the location of gas boiler flues in these types of building which are usually not permitted by the local Planning Departments.

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

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**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?**

- District Heating, where possible land is available.
- CHP Units – individual house or multiple dwelling systems.
- Isothane insulation – used in roof and wall structures.
- Thermodynamic panels – hot water heating

**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.**

As detailed in the consultation document, the Energy Efficiency (EE) standard is based on the cost of fuel which may not be the cheapest when compared against CO2 emissions. It therefore seems logical that an Environmental Impact (EI) score is used.

We would note that the total CO2 emissions from a property may, in some cases, be difficult to accurately predict where occupants have a significant number of electrical appliances.

**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 would however note that in order to give a fully informed answer, It would be of benefit to carry out a practical assessment to establish what the impact would be on a properties EE rating following the application of different measures.

Properties in country or rural settings may be affected where their current fuel is coal or oil (having high CO<sub>2</sub> emissions) but this would need to be established and possible solutions examined such as increasing insulation levels to counter the reduction.

**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.**

Link has a significant quantity, and variety of properties throughout many geographic areas within the Scottish area.

Link has utilised cloning of data for 'like' properties' based on their scheme profile and feel this policy would alleviate some of the timing issues prior to the proposed standards coming into force.

A further consideration would be the availability of labour resources to undertake EPC assessments, and whether this be in-house (incorporating training) or externally provided.



**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

Moving forward to 2020, the proposed standards, in most cases ( with exceptions) should be achievable using traditional solutions to energy conservation such as draft proofing, double glazing and wall and loft insulation. However, this may not be the case for more traditional and older properties where significant difficulties may be encountered in carrying out wall insulation ( solid walls) and loft insulation ( where coombed ceilings have been constructed )

The bigger problem comes in moving forward from 2020 to the 2050 standards and without significant advances in renewable technologies, the energy efficiency levels proposed may be extremely difficult, if not impossible to achieve with certain existing buildings.

**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

Because the proposed energy efficiency standard within the consultation document is lower than that in the SHQS standards, then, it does, to an extent undermine the requirements of the SHQS.

It must however be noted that because the standard applies to detached homes and bungalows, we would not see any reason why supplementary measures could not be fitted on these specific properties to bring the proposed EI rating in line with that required under the SHQS. These supplementary measures could be addressed within the requirements of the green deal / ECO funding streams on a rolling programme.

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

Given the significant price rises and uncertainty in fossil fuels during the past 5 years, there is a significant expectation by members of the public that these will continue into the foreseeable future. Link's approach is to ensure through new build design, refurbishment and with advice that energy in use is minimised.

We are committed to the sustainability agenda and work to promote and incorporate forms of sustainable energy production and heating but accept that a mixture of all heat sources are inevitable both from practicality and tenant's choice .

It is our view that, for a country to be competitive and self sustaining in future year's, energy production must be self generated, either by the energy companies or by individuals. Therefore, it must be a primary

requirement that all properties, whether these be new or existing, must be self sufficient in terms of heating and lighting in the future.  
It is recognised that natural gas is one of the cheapest sources of fuel in today's market, however, this has an infinite life expectancy and alternative fuel sources will need to be considered in the future, the obvious choice being electricity generated by natural environmental sources such as sun or wind.

The government's proposal of eradicating fuel poverty would appear unachievable within the current proposals and based on the current energy market given that energy prices are likely to continue to rise in the short to medium term and people's incomes are likely to fall in comparison.

**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.**

Each property is completely different in terms of construction type, location, orientation, size etc. any energy efficiency measures must be achievable, practical and affordable.

The simplest way to monitor the energy efficiency improvements would be to set a minimum percentage reduction based on a base line energy standard as is being currently proposed. The two options detailed above would be difficult to achieve in practice given that in order to achieve a "minimum percentage reduction" a base line figure would need to be first established for every property in order that the reduction can be calculated, and the second proposal of achieving a set of standard measures for every property would be difficult due to the varying property types, construction methods, and internal configurations making some measures difficult, if not impossible to achieve.

**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?**

There are pro's and con's for both proposals. However, in order to upgrade all housing stock to a minimum energy efficiency standard (as noted in the "Homes that don't cost the earth" consultation), each property needs, and should be dealt with on its own merits.

It is, however acknowledged that some properties will be significantly harder to improve than others and either specific exemptions or additional alternative measures may need to be considered. Funding options may also need to be increased by funders to help achieve the required standards for the more difficult buildings.

There is no doubt that all properties can technically be upgraded to achieve

a high energy efficiency standard, the problem being the practical limitations incorporating level of disturbance required in order to achieve this and the associated costs involved .

**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

The above proposal is one option that could be considered, the other being as described in the answer to question 19 where additional funding measures are offered in order that the property achieves the required Energy Efficiency (EI) standards.

The benefits of the additional funding being offered would be that all properties would be upgraded to the same minimum standards with no exceptions. It is most probable that properties that can't achieve the minimum standard are large, detached homes, and of an age pre war and in owner occupation..

These properties, by nature consume significant amounts of energy when compared with smaller residential houses and in theory, should have higher energy efficiency standards when compared with smaller properties

**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 of 42% does not necessarily have a direct correlation to the amount of energy consumed by a dwelling and therefore we do not feel that a reduction of 42% is particularly relevant especially when considering fuel poverty.

Furthermore, the 42% reduction target set by the Scottish Government relates to greenhouse gas emissions from all sources and not just from domestic dwellings.

Any reduction in CO<sub>2</sub> from housing will assist in achieving this target, but the most significant cause of greenhouse gas production is from commercial sources and transportation, principally liquid fuels ( 36%) and solid fuels (35%).

We agree that all properties by 2020 should, where possible, have the maximum levels of "normal" energy efficiency standards in insulation, heating and controls and heat loss through windows and doors ( adopting a fabric first approach)

**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

We recognise even with with current technologies and building materials, some properties will struggle to achieve the required targets due to the nature of construction, or its location (i.e – listed or within a conservation zone)

Without significant money being spent or massive levels of disturbance being caused to the occupants who are living in the building, the opportunity to upgrade some properties to achieve the exacting requirements of 2020 may be difficult to achieve. However, it is our view that the property should still be required to meet the targets but possibly over an extended time period. The idea being that the additional upgrade works ( over and above what can be achieved without significant disturbance) could be incorporated within a larger scale refurbishment programme where the tenants are being decanted as a necessity of other works. The energy efficiency upgrade of the building may then have to exceed the 2020 requirements if the works are programme beyond this date and either all or a provision to meet the 2050 requirements would need to be incorporated.

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

Link's tenants have benefitted from significant utility company investment via CERT and CESP schemes and an extension to these schemes would have proved more productive and effective.

Link also committed to Solar PV in a rent roof programme offsetting surplus to reinvest in energy efficiency measures but the Government's reduction of the FIT thwarted this innovation. Link is currently exploring a windfarm project to generate an income for wider community and energy efficiency benefits.

Other funding sources may be obtained from the manufacturers of energy efficiency products or materials, manufacturers obtaining a benefit from their materials being used or specified in return for some level of discount of subsidy.

**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

Much of the funding available today for Landlords is based on a set criteria and bid basis where Landlords have to apply for specific amounts of funding.

There is no guarantee that funding will be obtained ( as seen with the RHPP) and therefore no certainty in planning for future projects.

Furthermore, funding being provided by energy suppliers under the CERT programme had to meet certain benefits criteria and priority groups ( SPG and PG). One of the problems Link has experienced is that it has been very difficult to achieve the required split between these two groups ( as laid down by DECC) and many tenants are unwilling to disclose to their Landlord whether they are even claiming certain benefits which is essentially private and confidential information.  
It would be better to re-classify the system to provide assistance to an age criteria and a single benefits criteria, thereby ensuring Landlords can target specific areas with much more certainty.

**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.**

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

The four main data sources principally used are

- RdSAP
- SAP
- NHER
- Building Standards.

However, looking at standards adopted by our European neighbours may offer opportunities to develop further standards that could be used to supplement the above.

For example, Switzerland employs the Minergie 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

If the standard can be aligned to the SQHS requirements this could be incorporated s part of the Annual Statistical Performance Return

**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

Depending on the speed of development in new renewable technologies, we would propose that a review should be carried out at a maximum period of 5 years beyond the 2020 target in order to review progression towards the target. This will also allow the review of new technologies and possible future funding mechanisms.

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

Yes  No

See comments above

**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.**

None over and above those already made.