

**4. Please indicate which category best describes your organisation, if appropriate.**

**(Tick one only)**

<b>Executive Agencies and NDPBs</b>	<input type="checkbox"/>
<b>Local authority</b>	<input type="checkbox"/>
<b>Other statutory organisation</b>	<input type="checkbox"/>
<b>Registered Social Landlord</b>	<input checked="" type="checkbox"/>
<b>Representative body for private sector organisations</b>	<input type="checkbox"/>
<b>Representative body for third sector/equality organisations</b>	<input type="checkbox"/>
<b>Representative body for community organisations</b>	<input type="checkbox"/>
<b>Representative body for professionals</b>	<input type="checkbox"/>
<b>Private sector organisation</b>	<input type="checkbox"/>
<b>Third sector/equality organisation</b>	<input type="checkbox"/>
<b>Community group</b>	<input type="checkbox"/>
<b>Academic</b>	<input type="checkbox"/>
<b>Individual</b>	<input type="checkbox"/>
<b>Other – please state...</b>	<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.**

Exhaust air heating system at new build developments. Communal Biomass system at one new build development.

**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?**

For Loreburn the greatest cause of abeyances is a result of tenants being unwilling to provide access for works to take place or tenants not responding to requests for access. Attempts are made to gain access through advertising the annual programme of works in Loreburn’s Newsletter, lettering tenants regarding works to their property, telephone calls and visits by Loreburn staff. It is not expected that the Government could assist in reducing the number of abeyances further given the reason for abeyances being sought.

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

Please see above.

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

Early consultation is key.

**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 X No

Tenants are keen to see modernised heating systems, insulation and new windows which may help to reduce their heating bills.

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

Its agreed that they broadly reflect the benefits that tenants expect. The ability for tenants to heat their homes at a lower cost is the main benefit for tenants. The introduction of Smart meters will help Tenants have better understanding of their energy usage.

Loreburn already provides a number of Newsletter articles to tenants regarding energy efficiency, how to effectively heat their homes and energy tariffs. It is reasonable that tenants should be shown how to work any new heating system effectively and for follow up visits to take place, however it may be the case that follow up visits can be targeted through correspondence with the tenant to ask whether they require a further visit. This would reduce the burden on staff resources.

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

N/A

**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.**

Its not considered that any groups would be at risk as a result of this policy given it will only improve properties further.

**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.**

Any renewable technology considered would have to be fully assessed in order to ensure that the tenant is not disadvantaged in terms of usability or cost from its installation. Renewables should not be installed purely to increase the EPC rating; future maintenance costs, reliability, ease to service and maintain and tenant benefit must also be considered.

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

Regular publications from the Energy Savings Trust should be provided to Landlords regarding the energy assistance packages which are available. This can then be disseminated to tenants through landlord Newsletters etc.

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

Helpful X Unhelpful

The case studies are helpful for background information, however they do not go much further than the information provided on an EPC certificate. It

would be of greater benefit if the case study could consider properties which struggle to meet the standard.

**If you think they are helpful:**

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

The majority of house types are covered in the case studies. Pre 1919 semi detached and terrace could be added. Also, the date of construction relevant to the four in a block case study should be added. Hard to treat properties should be considered further as noted above.

**Question 8 (b): Are there any other types (including hard to treat) that you would like to be included as a case study?** Yes X No

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

As noted above, this would provide a greater range in the case study and would further reflect RSL stock.

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

The RdSAP method is a blunt tool and does not necessarily provide an accurate picture given the lack of flexibility in the completion of each EPC. Given the volume of works which have already been completed to meet the SHQS, it is assumed that only high cost measures such as photo-voltaic will allow properties to meet the new standard. The financial viability of this will need to be considered in detail.

RdSap does not take into account any of the householder energy consumption or location factors i.e. a family will use more energy than a single elderly pensioner. The weather on the East Coast is colder than the West Coast etc.

Some allowance has to be made for this i.e. if properties are not financially viable to improve further how will these properties be classified if not as exemptions?

Also, what rating will be applied to renewable systems such as exhaust air heating and biomass?

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

Yes X No

**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 X No

The measures suggested are not excessive and are considered reasonable, however it should be noted that Loreburn has already carried out a number of the measures which it is assumed will meet the 2020 standard, however the properties would not reach the SAP ratings proposed. In these situations, will an exemption be applicable?

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

The efficiency of renewables such as solar PV should be considered further. Significant investment is required for this type of technology, the performance of which deteriorates over time. The actual benefit to the tenant should also be considered.

**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?**

Can the EPC form be adapted to show the benefit of different types of electric heating i.e. storage, wet electric, exhaust air?

**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 X No

**If not, please explain why.**

This gives a clear standard which in most cases should be achievable, however the requirement to assess properties based on their type will require HA's to carry out additional EPC's – will information be able to be cloned for similar house types within a development?

**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 X No

The current energy efficiency level should be safeguarded, however where

this means that the required works cannot be carried out to achieve the EI Rating, RSL's should be able to consider these properties as exemptions.

**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 X No

**If yes, please explain why.**

Individual property details may be difficult to assess where the tenant is unwilling to provide access. At present these properties are considered as abeyances – this classification should be allowed for under the new standard.

As above, the requirement to assess properties based on their type will require HA's to carry out additional EPC's. 100% percent surveys were not required under the SHQS – will information be able to be cloned for similar house types within a development?

The requirements should be simplified i.e. not as many categories? This would make for more simplified monitoring and reduced costs to the RSL in EPC's etc.

**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 X No

N/A

**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 X

Where stock is a detached property it tends to be older stock which is hard to treat therefore a lower standard is suitable.

**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 recognised that there are issues regarding the efficiency of alternative heating sources such as LPG or solid fuel, however in rural areas there are significant problems in changing the fuel source i.e. no mains gas available, no capacity in the electrical supply, no room for sub stations on site, neighbouring landowners being unwilling to provide land at a reasonable

value for sub stations to be located, prohibitive cost.

**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.**

The EPC is the most effective means of measuring improvements.

**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?**

It will require significant investment in EPC's to allow all individual properties to be assessed. In addition to this, access may not be available to all properties should tenants be unwilling to provide access. It is considered that for the same house type on the same scheme, information should be able to be cloned, rather than an EPC being required for every dwelling.

**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

Agreed this offers a way forward, however at what point will it be appropriate to use this measures rather than the EPC? Will the RSL require to demonstrate that the EI rating is not achievable without uneconomical investment before using the baseline method? Clear guidance is needed on this matter.

**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?**

If there is legislation to support this level of reduction then it would appear reasonable to set this target, however has any modelling be done to confirm that this is a realistic level to obtain?

**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

How is it intended to deal with properties which cannot achieve the standard either through the EI rating or the baseline approach without uneconomical investment or where the tenant is unwilling to allow the works or consider a transfer to allow the property to be sold. Will these be treated as exemptions or abeyances as per the SHQS?

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

None 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

Green Deal will not be workable for RSL's given high tenancy rate turnover and the differing needs/energy uses of tenants. There is also little benefit to the tenant in Green deal as their energy bills will not reduce significantly, therefore there is no incentive to them. As a RSL operating in a largely rural area we will not have access to SPRUCE or JESSICA. This only leaves access to ECO, on which more information is required i.e. what measures will be covered. Given this, it is considered that funding is not flexible or accessible enough.

**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.**

Green Deal Providers can make training a requirement of registration for the scheme.

**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?**



Yes  No

Monitoring needs to be streamlined, it is therefore sensible for the SHR to monitor progress as part of RSL's annual returns.

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

Yes  No

None known.

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

Yes  No

Those suggested in the consultation appear appropriate (2020, 2030, 2040, and 2050).

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

Yes  No

Assessment of the milestones reached in 2020 need to be considered before a new target can be set.

**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.**

N/A.