

**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.**

Comments

**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?**

NHER requirements are problematic in 'off-gas' areas and in non-traditional properties which are deemed as 'hard to treat'.

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

Moray Council has not had any major problems in making energy efficiency improvements in mixed tenure estates due to the overall profile of the council stock. In the few cases where we have offered owner-occupiers to participate in upgrading programmes however these offers have been declined.

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

No Comment

**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

It appears generally that a substantial proportion of tenants would consider that homes that are energy efficient are a high priority

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

We would agree that the potential benefits to tenants are appropriate, and in many cases would lead to better overall quality of life.

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

No Comment

**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 Comment

**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?**

Wider access to comprehensive advice and information on energy use and fuel saving methods.

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

Helpful  Unhelpful

A range of appropriate case studies would allow Local Authorities to make better informed choices with regards to proposed improvements and advice provision.

**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

A selection of basic 'non-traditional' types should be included in the modelling, as well as fuel types which are more prevalent in rural areas, such as oil or solid fuel.

**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?**

As section 8(a) above - The major problem in a number of Local Authority areas is making cost-effective improvements to 'hard to treat' dwellings and those off the gas grid.

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

As this is a nationally recognised way of assessing energy performance then it is appropriate that it is used.

**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.**

A number of rural local authorities are still likely to have had a high proportion of dwellings with open chimneys at that time, as well as heating types that would have had a lower efficiency rating than that specified – this may put such Local Authorities at a disadvantage in relation to the baseline unless the baseline can be adjusted to take this into account for specific areas of the country.

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

Yes  No

Roof insulation should also be included in future measures, and in excess of current SHQS requirements. There may be issues with the proposals for 'zoned' time and temperature control in smaller dwellings. It is likely that rural 'off-gas' properties will be unable to attain a 90.9% efficiency in terms of heating provision.

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

See above

**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?**

Underfloor insulation, heat recovery ventilation fans.

**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.**

Yes – provided that it is in relation to a realistic ‘baseline’ taking into account comments made in answer to question 10 above.

**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

It is important that the energy efficiency of existing dwellings are not reduced.

**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.**

There will be some issues on resources, however provided that these can be dealt with, there is no reason why the information cannot be gathered.

**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

No Comments

**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

Given that there are likely to be very few such dwellings within normal council stock we do not see this as an issue.

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

A substantial proportion of tenants in rural houses still indicate a preference for solid fuel or multifuel heating systems – although if systems such as wood pellet boilers were perhaps more readily accepted as an alternative, then renewable heating systems could be put forward as the preferred

option. In terms of electricity, the best option would be Ground or Air Source Heat Pumps, however ASHP in particular may not meet required minimum EI values in some cases.

**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.**

There may be some merit in reconsidering the proposal to set a minimum percentage reduction for each dwelling type, provided that the reduction levels are realistic and based on appropriate house typing.

**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 should be applied to individual properties, provided that adequate resources are available to carry out this work.

**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 would give Local Authorities more scope to deal with these types of properties. Also see comments in relation to question 18 above.

**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?**

We consider that this type of reduction is unrealistic, and a more appropriate level of reduction should be set based on the maximum reduction achievable through the application of technically feasible improvements to the dwelling based on house type, fuel availability and construction.

**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

In some circumstances it may be impossible for certain dwelling types to meet a minimum standard, unless the 'percentage' reduction is adopted and based on realistic target reduction based on factors as noted in answer to question 20(a) above. We consider that there is scope for some level of exemptions to be offered depending on the 'standard' finally adopted, however these would have to be on an individual 'case' level.

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

No Comment

**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

Unless some improvements can be funded to a higher proportion than currently available, it is likely that a small number of installations will still be uneconomic.

**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.**

No Comment

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

No Comment

**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

We consider that there are further options that could be explored, including alternative bodies within the energy efficiency field who may be more suited to both monitoring the standard and carrying out a review of submissions to ensure consistency.

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

Yes  No

No Comment

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

Yes  No

Although reporting yearly would be preferable, given the longer timescale of 2050, an interim report based on a 5 year interval may be more appropriate, certainly in the period between 2020 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

No Comment

**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