

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 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 checked="" 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?

Comments

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

As identified by the government, "Improving Condition Homes can only become more energy efficient if they are in a [good state of repair](#)." The concern here is when one, or more, in a block of flats resists (or cannot afford) essential repairs to properties this can either stop any repairs or create an administrative (and possibly financial) burden on the local authority to ensure that these repairs are undertaken.

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

Seminars to raise the awareness of the issues of disrepair to properties. Also, developing a Building MOT scheme to encourage/empower property owners to undertake the appropriate repairs to their property.

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

Comments

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

Yes but we would also highlight the need to ensure that properties are in a good state of repair. There is little point in installing a Smart Meter if there is

water ingress and excessive drafts.

The Scottish Housing Condition Survey 2010 stated:

Local Authority/Other Public housing – 90% had disrepair but more worryingly 73% had disrepair to Critical Elements (Wind and Weatherproof).
Housing Association/Co-op – 77% had disrepair and 46% had disrepair to Critical Elements.

As previously stated, the government has acknowledged that “Improving Condition Homes can only become more energy efficient if they are in a [good state of repair](#).”

The issue of disrepair to Scotland’s homes is of paramount importance before we start to look at other ways to minimising the energy required to heat the buildings.

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

Comments

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 knowledge in this area

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 knowledge in this area

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

Ensure all properties are in a good condition.

Education on reducing fuel consumption.

Higher profile of the energy required to operate electrical items. While we have a rating system there appears to be little understanding of the system.

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

Helpful x Unhelpful

Really like the range of the case studies which will cover the vast majority of properties in Scotland.

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

Comments

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?

My concern here being that it does not refer to the condition of the property. We can put in double glazing but this will have little effect if there is water ingress.
It should include the condition of properties within this table.

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.

Does not include condition of properties. It should be cross referred to the Scottish Housing Condition Survey.

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

Yes No

Comments

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

Comments

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?

The condition of the properties with it being cross referred to the Scottish Housing Condition Survey.

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.

Comments

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

This could be achieved through a Building MOT scheme to ensure that properties become then remain in a good condition so they do not deteriorate in the future.

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.

Unable to answer

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

Unable to answer

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

Unable to answer

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

The cost to install these systems could be prohibitive for some of the properties but I do think it would be a positive development.

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?

I believe that it should be based on individual homes at some stage but will not be practical at the initial stages. This is something to aspire to in the future but any scheme has to be practical and enforceable.

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

However, these should be free of disrepair to critical elements as the minimum standard.

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?

Link this to the Scottish Housing Condition Survey and require all landlords of these properties to ensure they are in good condition (free from disrepair to critical elements) and are maintained on an annual basis to remain in a good state of repair.

Inappropriate insulation to meet the targets can have an adverse effect on elements of buildings and while reducing the energy used initially will

require repairs in the future to address the adverse effects which will result in emissions in the manufacture and installation of materials.

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

The examples given within the consultation are good reasons for this.

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

Funds from City Heritage Trusts and Townscape Heritage Initiatives to repair properties which have fallen into disrepair and meet the requirements of this funding.

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

Comments

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.

Comments

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

Scottish Housing Condition Survey.

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

No opinion

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

Yes No

Unable to answer

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

Yes x No

Comments

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

Yes No

Unable to answer

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.

Comments