

**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 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...Special Health Board</b>	<input checked="" 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.**

Glasgow Housing Association energy efficient homes see  
[http://www.gha.org.uk/content/default.asp?back=s25&newsid=3493&page=s25\\_1](http://www.gha.org.uk/content/default.asp?back=s25&newsid=3493&page=s25_1)

**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?**

Comments

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

Comments

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

Comments

**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

The issue for some tenants would be living in cold, damp and mouldy housing – which could partly be addressed by improving the energy efficiency of their homes. However, improved energy efficiency, by itself, may not necessarily translate into warm homes because of countervailing pressures keeping the relative cost of fuel high. For example:

- Wilson et al (2012) note that a major delivery mechanism for improving energy efficiency in homes (CERT) in the UK increases energy bills.
- Paying for energy by prepayment (power cards) is more expensive per kWh than paying using direct debit (DECC, Tables QEP 2.2.2 & 2.2.3)

Strategies to deliver energy efficiency should take the issues raised by Wilson et al (2012) (esp. p. 128-131 on reducing fuel costs and maximising income) into account. This study highlighted a number of unintended consequences such as the impacts of the contribution of energy companies to the costs of insulating homes on the cost (and therefore affordability) of energy and the impacts of the costs of

insulation on housing rental costs. It also highlighted the need to provide support and advice to householders to reduce their energy use.

Wilson T., Robertson J. and Hawkins L. (2012) *Fuel Poverty Evidence Review: Defining, Measuring and Analysing Fuel Poverty in Scotland*. Edinburgh: The Scottish Government.

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

Impact on damp and mould, impact on comfort, how people feel about their homes, and on health. While the direct link between fuel poverty and health problems is weak or not existent, that between self-reported inability to keep the home warm enough in winter and health problems is more pronounced. For example:

- Grainger and Robinson (2004) found that reporting that self-reported satisfaction with heating (but not central heating or fuel poverty) was associated with adult psychosocial disturbance, and adult and child respiratory symptoms.
- In the Growing Up in Scotland cohort of children, 14% of those whose parents reported they could not keep their home warm in winter had asthma in the last year, compared to 6% of those whose parents reported they could keep their home warm enough in the winter (Growing Up in Scotland Sweep 5 (birth cohort) - child aged 4-5).
- A case study of 101 residents of an Edinburgh high rise found "a high proportion of health related issues, such as depression, which residents felt were directly related to the conditions of their homes"(De Haro and Koslowski, 2012).

Improved energy efficiency in social housing can play a role in this.

Grainger S. and Robinson, A. (2004) *Housing and Health in Scotland Analysis of the 2002 Scottish House Condition Survey*. Edinburgh: Communities Scotland Investment & Performance Division.

De Haro, M.T. and Koslowski, A. (2012) *Fuel Poverty and High Rise Living: Using community-based interviewers to investigate tenants' inability to keep warm in their homes*. SPA 2012 Conference Papers University of York - July 2012. <http://www.social-policy.org.uk/lincoln2012/Koslowski%20P7.pdf>

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

We would suggest that it would be important to start from the concerns of residents and communities. Priorities for residents may thus include – reducing dampness and mould levels and the ability to keep homes at a comfortable affordable temperature during the hours of residency.

**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.**

Comments

**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.**

This depends on the impact of implementation – if it results in an increase to rents (as noted in Wilson et al 2012, p. 131<sup>1</sup>) or energy costs then it could have profound impact on residents who can not afford the increased costs and may be moved to less attractive housing or out of the social rented sector.

Action: don't raise rents following housing improvements

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

Although we strongly support action to reduce fuel poverty and to improve the energy efficiency of housing (to create positive financial, health and sustainability impacts), there is a possibility that an unintended consequence would be increased energy consumption because of the increased affordability of energy consumption (the so-called Khazzoum-Brookes postulate). There are a variety of policy solutions to this including carbon rationing, which would be sustainable, health promoting and equitable. Refs include: Hillman M, Fawcett T. How we can save the planet. London: Penguin; 2004.

McCartney G, Hanlon P. What can health professionals contribute to the challenge of sustainability? *Public Health* (2009); 123 (12): 761-4.

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

Helpful  Unhelpful

Comments

**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

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

<sup>1</sup> <http://www.scotland.gov.uk/Resource/0039/00398798.pdf>

**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?**

Comments

**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.**

Comments

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

Yes  No

The measures suggested appear to focus on activity and inputs rather than outcomes. Need to include measures of outcome such as energy use.

**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?**

Comments

**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

Comments

**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.**

Comments

**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

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

Comments

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

Concerned that the consultation document does not refer to the issue of future scarcity and increasing costs of e.g. gas as a fuel. It is vitally important that the concepts of peak oil and peak gas are included in the thinking in relation to housing infrastructure so that there is not a need for several iterations of re-engineering to move towards truly sustainable energy sources. It would also be helpful to include discussion of micro-generation and community heating systems in this section.

**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?**

Comments Agree that it should apply to all individual homes.

**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

Comments

**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?**

From a health point of view the minimum would be sufficient to achieve warm dry homes which do not suffer from high levels of damp and mould and which allows the occupants to live without being in fuel poverty.

**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

Comments

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

Comments

**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.**

This might also be a good opportunity to target the creation of training and work opportunities for all young people who are currently not in education, training or employment in the form of creation of modern apprentice opportunities. This is a group of people at increased risk of negative life and health outcomes.

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

Comments

**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

Comments

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

Yes  No

Comments

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

Yes  No

Comments

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



Elphinstone House, 65 West Regent Street, Glasgow G2 2AF  
Tel: 0141 354 2900 Fax: 0141 354 2901  
www.healthscotland.com



**28<sup>th</sup> September 2012**

Angus Macleod  
Housing Sustainability  
Scottish Government  
Highlander House  
58 Waterloo St  
Glasgow  
G2 7DA

Dear Angus

**Consultation: Developing an Energy Efficiency Standard for Social Housing**

Thank you for the opportunity to respond to the above consultation.

Please find attached NHS Health Scotland's response.

If you have any questions regarding our response, or wish to discuss any point further, please contact Sheila Beck at [sheila.beck@nhs.net](mailto:sheila.beck@nhs.net) in the first instance.

We would welcome feedback on how helpful you have found our response.

Yours sincerely



 **Gerald McLaughlin**  
Chief Executive

*Other offices:*

Woodburn House, Canaan Lane, Edinburgh EH10 4SG  
Tel: 0131 536 5500 Fax: 0131 536 5501

Thistle House, 2nd floor, 91 Haymarket Terrace, Edinburgh EH12 5HE  
Tel: 0131 313 7500 Fax: 0131 313 7501