

**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.**

Given that Orkney has no mains gas we have been in a position of having to be quite innovative in order to meet the Scottish Housing Quality Standard. Consequently Orkney Islands Council (OIC) has moved on from basic property upgrades, such as loft insulation and cavity-wall insulation.

With a portfolio of 840 properties (as at 31 March 2012) we have installed/retrofitted heat pumps to 5%, photovoltaic panels to 8% and external wall insulation to 1.4% of our stock.

We are currently underway with a trial of air-to-air heat pumps in 13 properties as a secondary heating system for properties with electric storage heating. The intention is to increase energy efficiency and reduce tenant spending on heating.

We are also replacing solid fuel heating systems with ground source, air source, and air to air heating systems as well as fitting photovoltaic panels to address the issue of energy efficiency. We are also fitting external and internal insulation in properties where this is possible

**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?**

We expect to have relatively few abeyances. These may include properties which we do not intend to let as they do not meet our strategic purpose. Some difficulties have, as would be expected, been encountered in obtaining access into some properties to allow completion of an energy survey and the subsequent assessment of energy efficiency improvements required. This may be for a number of reasons. We also have examples of Tenants refusing to an upgrade programme usually this is because the individual is of a certain age and feels unable to deal with the works involved even if the option of decanting them were proposed.

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

We undertook a programme of external insulation on our 'Swedish' stock ie properties of pre-fabricated wooden construction. Many of the properties

had been sold through the right to buy. Consequently we organised a public meeting and invited owner occupiers along. At the meeting we provided technical information on the works proposed and provided details of the likely costs for owner occupiers. Owner occupiers were given the option of having their houses externally insulated alongside the Council's contract provided they were prepared to cover the cost. The discussion also included information on whether grants were likely to be available. The meeting was well attended.

Some residents could not make the meeting so alternative arrangements were entered into so they could access the same information.

Although some interest was shown and some owner occupiers also spoke to Council officers after the meeting no private individual took the works forward. That said it was still a valuable exercise and helped to allow owner occupiers to see what the Council intended to do and to alleviate fears as to the visual impact on untreated houses.

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

We would take each case on its own merits but its likely to be a similar approach to that outlined above.

**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

We undertook a consultation exercise in respect of meeting the SHQS and asked tenants what their priorities were. Energy efficiency, particularly in relation to housing costs were valued highly by tenants.

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

We have already identified that energy efficiency is important to tenants particularly in relation to lower heating costs. It would be very valuable to work with tenants and support them so that they can maximise measures which have been installed in their property. Without having tangible evidence of how particular measures or actions will reduce energy usage, tenants will be unlikely to take action to manage their fuel usage.

On a day to day basis tenants are expressing concern about the increases in energy prices. With Scottish and Southern Energy announcing that it is to increase again by 9% this is becoming a huge issue for those who living on

limited incomes. If we replace older heating systems with more energy efficient heating systems then this should go some way to alleviate some of the fuel poverty issues in Orkney however there are still risks that tenants may not use the heating systems in question.

Some of our housing stock is in a conservation area and/or is listed and consequently we are very limited to what we can do to increase energy efficiency in these cases.

**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.**

It is unlikely that any particular equality groups would be at risk as a result of this new policy. The main risk in respect of energy efficiency measures is that tenants may believe they cannot afford to use even the most efficient heating systems and this may be exacerbated with welfare reform. Issues such as the 'bedroom tax' will put people who are underoccupying in a position where they may struggle to pay the rent never mind heat the property. Councils will not necessarily have sufficient smaller properties to move the individuals to.

**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.**

Not specifically see question 5 above

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

The installation of smart meters should assist provided their usage is supported by assistance on their usage from the Local Authority.

Provision of practical advice on how to minimise energy usage while ensuring the house was heated appropriately and within the tenants means as far as possible.

The installation of low energy light fittings, LED, to ensure all lighting used is low power and therefore low cost.

Landlords would have the option of allocating a higher rental charge to properties which are more energy efficient having undergone more

significant improvements. The higher rental cost would be offset by lower electricity charges. This would be an individual matter for organisations to consider in line with their rent setting policies.

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

Helpful  Unhelpful

**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

This seems to be a comprehensive list.

**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?**

One of the main issues for us is much older property types which are listed buildings as this limits the works we can undertake. Technically these would fall into the pre-1919 bracket but it may be helpful to include house types which are likely to be listed.

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

Rd SAP appears to be a sound choice (based on current use and cost of publication). However, the current average weather data does not accurately reflect the conditions in Scotland, let alone the conditions in the North Isles. Therefore a standard template of scores will not reflect the true situation of our Housing Stock and the energy / emissions ratings.

**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.**

N/A

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

Yes  No

Most of the proposed measures in the further and advanced category are achievable within a reasonable cost.

**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?**

Current trials of air to air heat pumps as a complimentary heating system have shown positive results where electric storage heating demand can be offset by the heatpump. This may be a useful option for electric heated housing.

**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.**

Assessing emissions rather than ‘cost of use’ is the ideal measurement

**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

Having a default Energy Efficiency (‘cost of use’) score to underpin the Emissions score has merit. However the SAP software, currently in use, penalises electricity on emissions ignoring areas where there is significant ‘green’ generation such as wind, solar and tidal, so to switch over to Emissions will dramatically change our perception of our Housing Stock. Ideally the structure used should allow inclusion of a factor to positively include green electrical energies.

**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 always be practicalities to negotiate such as arranging access with tenants who have other issues in order to complete energy surveys (EPCs) and to quantify the required capital programmes but these issues are not insurmountable.

It is likely that the cost of this exercise would be substantial however at a time when resources are greatly restricted.

**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

Not for electrically heated homes. The EE score, underpinning the EI score, remains the same as for SHQS. However, it is SAP 2001 software that requires a score of 60 to pass SHQS whereas the current SAP 2009 software requires a score of 63 consequently in effect are we saying all electrically heated homes have to reach a (EE underpin) score in 2020 that is less than the 2015 SHQS target?

**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

Depending on the SAP software used for the standard scores, in this consultation, it may be that all electrically heated scores are undermining the SHQS targets. See Q15.

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

DECC are proposing that a mechanism be developed to enable communities with a local wind farms to benefit for reduced electricity cost as a community benefit. Orkney is a net exporter of renewable energy and as such the low carbon local generation mix should be considered when assessing emissions. As an off gas grid area electricity is the main heating

fuel for domestic properties, as renewable electrical generation continue to increase electricity as a heating fuel will become increasingly important, it will be vital to address local generation mix when assessing the emissions due to electricity as a heating fuel

We still have approx 9% of housing stock with solid fuel fires as primary heating (back boiler / room heater). The strategy to replace these with heat pumps has proved extremely expensive.

**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.**

**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?**

A process of individual assessment is preferred. However, we still have reservations as to how 'hard-to-treat' & electrically-heated homes are to be assessed.

**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

N/A

**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?**



N/A

**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 abeyances suggested in the consultation document seem appropriate however the requirements to meet the standards would apply at the next change of tenancy.

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

These appear to be quite limited. Funding sources such as ERDF have proved problematic in that they are available to bring properties above the SHQS. This causes practical issues where the property currently doesn't meet the standard and equality issues. When a given standard is to be met, is it appropriate to bring only some houses above that level and not others. Financially it may also not be possible as the funding represents a proportion of a cost that technically does not have to be created.

The proposed Green Deal and ECO funding offers an opportunity for future funding of improvements to social housing.

**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

We are a small landlord with only 840 properties. Any additional cost will have an impact on the rent. This may be different for sizeable landlords of course but economies of scale will be a huge issue in rural Scotland.

We also have no access to the quick hit benefits of improving gas boiler efficiency. Contracts to replace boilers can be quite replicable, where a small local authority is trying to deal with a small quantity of hard to treat properties the cost of interventions escalates. Some form of collaborative working will be required to ensure successful projects can be replicated and costs minimised.

**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.**

Perhaps simply advertising in a manner that would appeal to women while indicating what such a career may offer to them. Careers advice / events in schools may also be an option.

Incentives for building companies to employ Positive Discrimination may be an option, under green deal an employer may be required to show a particular percentage of female workforce and apprentices in order to qualify as a green deal installer.

**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

The SHR is the most appropriate body. Monitoring is perfectly reasonable but it would be valuable for the Government or SHR to work with Local Authorities to enable them to understand what future monitoring will be required and to enable them to develop the structures they need to comply. This has been undertaken well by the Scottish Government in the field of homelessness but it has been less well developed in relation to the SHQS.

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

Yes  No

This depends on the IT structures Local Authorities have in place. We would have a cost as we would need to further develop structures which are perhaps not sufficiently advanced at present.

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

Yes  No

Otherwise 2050 seems like a long time away. 5 yearly milestones may be appropriate and manageable.

The government is committed to regular reviews of emissions under the Climate Change Scotland Act, monitoring points based on the timeline in

this legislation would minimise reporting of estimated values.

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

Yes  No

N/A

**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