

## Consultation on indicators for the Energy Efficiency Standard for Social Housing 2: Consultation questions

We welcome your general feedback on our proposals as well as answers to the specific questions we have raised. Please do not feel you have to answer every question unless you wish to do so.

Send your completed questionnaire to us by **15 January 2021**.

By email @: [shr@shr.gov.scot](mailto:shr@shr.gov.scot)

Or post to: Scottish Housing Regulator  
Buchanan House  
58 Port Dundas Road, Glasgow, G4 0HF

### Name/organisation name

Hebridean Housing Partnership

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### How you would like your response to be handled

To help make this a transparent process we intend to publish on our website the responses we receive, as we receive them. Please let us know how you would like us to handle your response. If you are responding as an individual, we will not publish your contact details.

### Are you happy for your response to be published on our website?

Yes

### If you are responding as an individual ...

**Please tell us how you would like your response to be published.**

**Pick 1**

Publish my full response, including my name

Please publish my response, but not my name

**1. Is there anything not covered by the proposed indicators? (if yes, please explain)**

No

**2. Are there any indicators that you feel are not appropriate and, if so, why?**

All appropriate

**3. Is there any information we ask for that you feel does not need to be included or that we have been missed?**

No

**4: Would you like to make any other comments or suggestions about our proposed indicators?**

More guidance is required on category 3 of **Table 1. Meeting EESSH2 by 2032** to allow social landlords to be confident that they have complied with EESSH2.

At the outset, we would note that we do not believe that SAP is always the best tool for measuring EESSH2 performance in these properties, as it does not take account of the real life impact of change on tenants and their experience. However, we appreciate that this is recognised in the guidance to some extent.

The vast majority of HHP homes with air source heating and insulation fitted (where possible) will at present result in a band C or D. We will assess as to whether these can be brought to Band A or B.

There does not seem to be anything in the guidance that gives clarity on whether Landlords assessment on 'all reasonable efforts' will be subject to scrutiny and/or challenge. The guidance states that '**Landlords should satisfy themselves...**' but we wish to avoid any uncertainty or ambiguity in this area, which could later have significant impacts on our business planning.

With EESSH, it was clear but EESSH2 is more ambiguous and this needs addressed. If there is a potential for challenge on landlords decisions and assessments and for SG/SHR to recommend or insist on further works then this should be clear at the outset.

It would also be helpful to include more links to relevant guidance.

**Thank you for taking the time to give us your feedback!**