

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

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

Name/organisation name

Craig Stirrat, Chief Operating Officer, Grampian Housing Association

Address

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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 we consider the proposed indicators below are sufficient for measuring achievement of EESSH 2. We however would say at this stage it is very difficult to assess the investment required as we are in a transition time with new technologies and methods of funding (including Government subsidies) coming forward that may make achievement of bands A & B more likely.

- Percentage of homes meeting EESSH2;
- Percentage of homes below EPC Band D;
- Anticipated temporary exemptions from EESSH2 (for properties below EPC Band D); and
- Investment in EESSH2

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

No, we believe the indicators are well thought out and should allow a consistency of reporting from Social landlords.

The challenge will be consistency and validation of performance measurement as the yardstick for measuring is EPC ratings and SAP 2012 which is theoretical and open to different EPC assessors opinions

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

Fundamentally any upgrades to homes to make them achieve Bands A & B must also benefit the tenants (in terms of comfort and affordability) as well as reducing energy use and carbon emissions . So consideration should be given to measuring benefits to tenants because these improvements will ultimately have to be paid for through rent increases.

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

As referred to above, a key objective should be to benefit tenants by reducing fuel poverty so we suggest recording actual gas or electric usage for addresses so we see and can evidence the actual differences to tenants costs and change in utility usage when we make changes to insulation, heating or fit new technology.

All we would need would be an annual meter read, there may be practical or data protection reasons why we can't although with ministerial support we consider its something that could be monitored.

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