

## 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

Stirling Council (Housing Services)

### Address

Allan Water House

Kerse Road

Stirling

Postcode **FK7 7SG**

### 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)**

There should be a requirement for all RSL's to continue to report the total number of properties with a valid EPC by all EPC energy efficiency bandings i.e. A, B, C, D, E, F & G as per current C12 indicator for EESSH1. This provides invaluable benchmarking data for all RSL's, SHR and the Scottish Government as to the total number of social rented stock with a valid EPC and the percentage of stock within each banding. It also provides data to then calculate the percentage of the social rented stock that has a valid EPC and therefore how much cloning is being used to report on compliance. This level of data across the social rented sector in Scotland is not captured anywhere else and it would be a great loss for this data not to continue to be captured in the annual returns.

In respect of data on the environmental impact rating, although it will not be a requirement for RSL's to report on this data until 2025, the majority of RSL's will already hold this data from their current EPC's. It would therefore be an opportunity for RSL's to voluntarily lodge this information where they have it available by simply adding an additional indicator and reporting on the number of properties with a valid EPC by EIR banding. This would provide the Scottish Government with data on the environmental impact ratings of the social rented stock in advance of it becoming a formal requirement under EESSH2 reporting.

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

NO

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

See 1) above.

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

Indicator 4 – I would comment that data captured in the current EESSH1 return does not provide a true picture of total investment by RSL's in energy efficiency works to their stock. Many social landlords will have further invested in properties already compliant with EESSH1 to make them EESSH2 compliant in advance of EESSH2 coming in to force. Therefore this level of investment will not have been captured in EESSH1 returns to date and will not be captured in future EESSH2 returns with the investment having already been carried out in previous years. The result is that investment in EESSH1 and EESSH2 returns will be far lower than the actual level of investment by social landlords.

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