

# **Scottish Fuel Poverty Statement**

## **Response from Friends of the Earth Scotland and the Association for the Conservation of Energy**

Friends of the Earth Scotland and the Association for the Conservation of Energy welcome the opportunity to comment on the consultative draft of the Scottish Fuel Poverty Statement. The eradication of fuel poverty in Scotland has been a major policy aim of ours for a number of years and we see its end as a prime example of Environmental Justice. By improving the energy efficiency of the housing stock in Scotland peoples' lives will be improved as they are lifted out of fuel poverty and at the same time, the Scottish Executive will make progress on achieving its commitment to reduce the emissions which contribute to climate change.

On the whole, the proposals within this Scottish Fuel Poverty Statement are very welcome. It should be particularly commended for introducing 2016 as the target date for the eradication of fuel poverty in Scotland and proposing a front loaded target. There are, however, a number of specific comments which need to be raised and issues which need to be acted upon.

### Chapter 1 - Understanding Fuel Poverty

1.11 We welcome the commitment to monitoring the number of people experiencing fuel poverty using a definition of household income which excludes Housing Benefit and Income Support for Mortgage Interest but would prefer that to be the primary definition. The definition chosen, which is inclusive of all Social Security benefits, has the effect of falsely inflating household income and, at a stroke, removing thousands of people from fuel poverty.

1.20 The effects of fuel poverty should include an additional paragraph on the wider environmental effects. Fuel poverty has obvious links with climate change as energy inefficient housing has a detrimental effect not only on peoples' quality of life but also on the state of the global environment through unnecessary emissions of greenhouse gases.

### Chapter 3 - Key Developments since 1996

3.17 The transfer of housing from local authority to housing association ownership provides an excellent opportunity to improve the energy efficiency of stock. The Fuel Poverty Statement should introduce a policy whereby future housing stock transfer agreements must include a requirement to improving energy efficiency by a certain amount or to a certain standard.

3.19 The section on the Home Energy Conservation Act (HECA) needs to include details of percentage improvements in energy efficiency achieved as well as money spent. There also needs to be recognition included here that HECA, on the whole, has not been very successful and that there are a number of problems inherent in it. Additionally, this section fails to highlight that under HECA local authorities are required to improve the energy efficiency of homes in the private sector as well as in their own stock.

## Chapter 4: Moving Forward - our Strategy for tackling Fuel Poverty in Scotland

4.6 The possible expansion in the use of energy audits as a means of developing a more comprehensive data set suggested here is welcomed. However, a stronger commitment to their further development and use should be included. Energy auditing and labelling when marketing a house would: build a detailed picture of the condition of Scotland's housing; assist in the production of local housing strategies and provide local authorities with vital extra information for their HECA reports; allow for resources to be targeted; give tenants and buyers information regarding potential homes; and provide indicators of sustainability.

Paragraph 4.6 fails to provide a timescale for the further use of energy audits or a strategy for how this expansion will take place. Energy audits are likely to become essential soon, anyway, as a result of the new EU Directive 'Energy Performance in Buildings' which the Council of Ministers will approve on June 6, and which will make energy certification compulsory whenever a home changes ownership or occupants. It would make sense to think about this Directive, and its implementation, sooner rather than later

4.9 Further research, and subsequent action, on hard-to-reach groups in terms of experiences of fuel poverty is essential now if the 2016 target is actually going to be achieved.

4.10 While the recognition of the need for more information at the local level is welcomed, it is essential that details of how exactly that information will be obtained is included. Local authority opinion tends to be that the Scottish House Condition Survey provides very little valuable information at the local level and that they themselves have neither the resources nor the time to carry out their own individual surveys. This also raises the issue of whether local surveys would be comparable.

4.12 This section deals mainly with raising awareness of fuel poverty issues among stakeholder groups. It is crucial that awareness is raised amongst members of the public. There is also a major need for greater co-ordination in terms of public advice and awareness raising. At present members of the public are often unsure as to who to contact and the numerous different schemes and organisations in existence can be baffling.

4.15 This paragraph outlines housing improvement schemes currently operating (the Warm Deal and the Central Heating Programme) and which will continue to take specific groups out of fuel poverty. There is, however, no mention of how those in fuel poverty who are not included in these schemes will be taken out of it. It is simply not good enough to suggest that targets and milestones will be achieved by continuing with the current initiatives only. A commitment to implementing new schemes, or at least expanding the eligibility of current ones, within the lifetime of this fuel poverty statement is essential. This is especially true if there is to be a strong, front-loaded target for the period which this statement covers, as proposed in paragraph 5.6.

One area in particular which the current schemes does not address is that of hard-to-heat homes. Cavity insulation and gas central heating will be of no use to solid wall properties or homes without access to the gas mains respectively. The strategy needs to highlight the problems of hard-to-heat homes and propose mechanisms for tackling them. In the UK as a whole, figures suggest that 44% of the fuel poor, over 2 million households, live in hard-to-heat homes. While we do not have figures for Scotland, which is a problem in itself, it is clear that the target for eradicating fuel poverty cannot be achievable until the issue of hard-to-heat homes is addressed.

4.17 The private housing sector is likely to prove the most difficult to tackle in terms of fuel poverty and while the proposed link between the Fuel Poverty Advisory Group and the Housing Improvement Task Force (HITF) should prove to be a useful one it needs to be strengthened, with more detail in the statement. For example, while this paragraph indicates that the Fuel Poverty Advisory Group will advise the HITF on fuel poverty issues that it may want to consider, it does not specify what any of these may be. Issues such as energy auditing, the regulation of the private rented sector and the powers available to local authorities to compel private owners to invest in their properties should all be specified to ensure that they are not missed. There also needs to be an indication of when the recommendations of the HITF will be considered, how that will take place, and when those recommendations will be implemented. Again, for the success of the strategy, it will not be sufficient to simply leave work on the private sector until the introduction of the next fuel poverty statement in 2005.

4.21 We would strongly welcome the introduction of a domestic energy efficiency target but this must either rationalise or supersede local authorities' HECA targets. In order to be meaningful any target introduced must be based on a domestic sector reduction in either carbon emissions or energy use. We see an NHER-based target as a secondary measurement which should not be used as the primary domestic energy efficiency target.

4.22 While the introduction of the Sixth Amendment to the Building Standards (Scotland) Regulations (1990) is a positive move forward it does not go far enough. There must be recognition in the Fuel Poverty Statement of the fact that the Building Standards are continuing to be revised and their scope increased. If the Building Standards are to have an effect on those living in fuel poverty they must be made to apply to existing buildings and not just new build.

## Chapter 5: Moving forward - our milestones for change

5.3 While it is recognised that the information gathered by the 2002 Scottish House Condition Survey will prove invaluable it must be ensured that any decrease in the numbers of people in fuel poverty it highlights are not counted as progress towards the first milestone. If this happens it will make the final target for the eradication of fuel poverty in 2016 all the harder to achieve by reducing the effort expended in the early years.

5.6 The suggestion here that target reductions in the numbers of householders in fuel poverty should be front-loaded is one which we strongly support and one which will be crucial to achieving the eradication of fuel poverty by 2016. This deadline means there are actually only 14 years to achieve the stated objective. Subsequently, if the target is to be front-loaded at least a 40% reduction in the number of people in fuel-poverty must be achieved by 2007, as around 37% would be an even third. We recommend that the SHCS 2002 results provide the baseline for interim targets and that the strategy should aim to remove 50% of these homes from fuel poverty by 2007.



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