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**Friends of  
the Earth  
Scotland**

20 July 2006

Dear Lisa

## **REVISION OF THE SCOTTISH FUEL POVERTY STATEMENT**

Thank you for your invitation to comment on the Scottish Fuel Poverty Statement as part of the current review, and in particular to comment on the draft action plan. I hope the comments below are useful. Quotes from the statement are in italics, and our comments follow these in normal font. We have not commented on every question, but have merely commented where we have a particular interest.

*“To take forward our commitment to promoting greater energy efficiency we will:*

- *Explore the feasibility of a target relating to domestic energy efficiency in Scotland*
- *Implement amendments to the Building Standards (Scotland) Regulations 1990 which aim to improve the energy efficiency of new dwellings by approximately 25%*
- *Continue to support innovation in the development of new technology to promote greater energy efficiency and encourage private sector take-up of insulation measures.”*

Although a target of reducing the number of houses with poor energy efficiency by 20% by 2006 was adopted in the 2003-6 spending proposals, it is unclear whether this has been achieved, since the Scottish House Condition Survey for 2006 will not be published until next year at the earliest.

However, we believe the target set out in the 2003-6 spending proposals was insufficiently ambitious, and should be revised to deliver a 20% improvement in the average NHER rating for Scottish homes by 2010. This would bring Scotland into line with England, where the same target was established through the Housing Act (2004), and was originally proposed by the Downing Street Performance and Innovation Unit.

Regarding Building Regulations, while the current standards are designed to emit 25% less CO<sub>2</sub> than the previous standards, there is no evidence that this is actually occurring in practice. Research is urgently needed to assess compliance with the energy standards within building regulations in Scotland, since anecdotal evidence suggests it to be poor. Similar research in England suggests 43% of new houses do not comply. Lastly, a requirement for consequential improvements to existing dwellings when they are refurbished or extended would assist in driving energy efficiency standards up for existing buildings, as well as for new buildings.

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In terms of supporting new technology, we welcome the pilot study to use small-scale renewables to tackle fuel poverty, and would like to see wider roll-out of these technologies as soon as possible upon successful conclusion of the pilot. We also warmly welcome the proposal in the draft SPP6 to require 10% of the energy for certain new developments to be sourced from on-site renewables. However, we believe the simplest method of implementing this so-called 'Merton rule' would be through building regulations.

*"To take forward our commitment to developing knowledge and monitoring change we will... set ourselves the goal of improving the extent to which changes in fuel poverty levels can be monitored."*

While we welcome the move to annual reporting of the Scottish House Condition Survey, we believe it essential that information on the energy performance of dwellings, which will in future be gained through the provision of energy performance certificates, should be made available in the form of an energy performance register to the Executive and to local authorities. While this information would not include household income information, and would therefore not be of direct relevance to fuel poverty figures, it would assist the Executive and local authorities in identifying those properties most in need of energy efficiency improvements. It would also assist local authorities in achieving their targets under the Home Energy Conservation Act.

*"To take forward our commitment to improving Scotland's housing stock in order to tackle fuel poverty we will... explore how effective interventions might be developed to reduce the number of owner-occupiers and private renters in fuel poverty."*

As mentioned above, the energy performance certificates, which are being introduced in Scotland in order to comply with the EU Energy Performance of Buildings Directive, will assist in this regard, so long as the directive is fully and appropriately implemented. In particular, the certificates must include: both an NHER rating and a carbon emissions rating; suggested improvements which are specific to the property; a list of barriers to suggested improvements; and an estimate of fuel use in kwh. Once tenants and owner-occupiers start to become familiar with the certificates, the most inefficient homes will be increasingly difficult to let or sell, thus creating an incentive on landlords and owners to improve the energy efficiency of the dwelling.

I hope you are able to take these comments into account when revising the Fuel Poverty Statement.

Yours sincerely

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