

Issues in Improving Quality in Private Housing

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 first report of the Housing Improvement Task Force, “Issues in Improving Quality in Private Housing”.

Friends of the Earth Scotland (FoES) is a major environmental campaigning, policy development and research based NGO with over 5,000 members. FoES focuses heavily on issues such as climate change and has therefore a central interest in buildings and energy consumption in particular.

The Association for the Conservation of Energy (ACE) is an association of major UK-based companies, active in the energy efficiency industry. ACE is a campaigning organisation which also carries out independent policy research on energy conservation. ACE was formed in 1981, with a remit to encourage a positive national awareness of the need for and the benefits of using energy conservation in buildings, to help establish a sensible and consistent national energy efficiency policy and programme, and to increase investment on all appropriate energy saving measures.

General Comments

FoES and ACE are fully supportive of the work of the Housing Improvement Task Force. The ‘issues’ paper is a very comprehensive document and we only have a few specific comments to make. The only cautionary note we would add is the importance of the HITF keeping to its remit. FoES and ACE are slightly concerned that the task force has, for example, shifted emphasis away from what impact seller surveys would have and how to provide better information to house buyers, towards the intricate workings of the housing market in Scotland. It is crucial that, when producing solutions, the task force promotes the best measures for housing improvement and not only those which they believe the housing market will adopt easily.

We look forward to the publication of the ‘solutions’ paper and would urge the task force to put the concerns of sustainable development and energy efficiency at the heart of the work that they do. Improving Scotland’s private sector housing stock by means of energy efficiency measures will make a major positive contribution towards the Scottish Executive’s commitments on fuel poverty, the energy review and the Kyoto protocols.

Specific Comments

3. The extent of disrepair and obsolescence in the private sector

We welcome the range of issues covered by this section but would suggest an addition. The issue of ‘hard-to-heat’ homes is a major one for the private sector and one which has a major impact on both the quality of Scottish housing and the improvements that can be carried out to it. Homes can potentially be classed as ‘hard-to-heat’ if they are solid wall or non-traditional construction (i.e. non-cavity wall) or if they have no access to mains gas. In the UK as a whole around 36% of the total 24.5 million

dwellings are of these ‘hard-to-heat’ types. This is, therefore, an issue which must be flagged up to ensure that housing improvement solutions specific to this type of dwelling are found.

44. When portraying the position of rural housing in Scotland it is necessary to bear in mind that 25% of the Scottish housing stock does not have access to mains gas. A large majority of that 25% will be rurally based and therefore it is a major issue which must be addressed. Innovative methods of housing improvement must be examined as a ‘solution’.

4. Investment patterns in private sector housing

69.5.4 It states here that the Scottish Executive has a target of eradicating fuel poverty by 2010. This is clearly an error.

78/79. We would strongly agree with the conclusion that the market does not in itself provide a strong enough incentive to ensure that property is kept in good condition in relation to the private rented sector. Indeed, we believe that many of the problems associated with the private rented sector are a result of the lack of regulation in this sector and we would urge the task force to consider this issue as a matter of great importance when producing the ‘solutions’ paper.

7. House buying and selling

132. A large percentage of home-buyers would state that they are dissatisfied with certain elements of the home-buying process in Scotland, especially the need for multiple surveys. Examining only peoples’ satisfaction with the home-buying process as a whole does not give us an accurate or detailed enough picture.

140. This section hints at there being a potential for seller/independent surveys but fails to explore the issue in any depth. This issue is key and should be given much greater importance by the Task Force. Moves towards sellers’ surveys have taken place or are under consideration in a number of countries. Both the Danish and New South Wales systems have recently adopted sellers’ surveys with no major problems reported. The UK Government have also attempted to move to a system of sellers’ surveys in England and Wales and proposed a Homes Bill to this end.

The HITF must also put greater emphasis on trying to find a way of introducing energy audits as Scotland will soon be compelled to carry out energy audits of every property as a result of an EU Directive on the energy performance of buildings (COM(2001)226 final). This Directive recently received approval from the EU Council of Ministers and the UK government has already enthusiastically welcomed it, stating that they would introduce it “as fast as possible”. This HITF provides an excellent opportunity for Scotland to lead the way in Europe and realise the benefits of energy audits.

142. This paragraph outlines the different types of survey a prospective home-buyer can have. It should also state that it is possible, depending on the surveyor, to have an energy audit carried out at present.

147.1 In this section it states that there is “no evidence of any general demand for such information on the part of buyers” in relation to energy audits. There is evidence to show that there was no demand for the energy labelling of white goods and, that after an EU Directive on them was introduced, people took very little notice of energy labels when making their purchasing decisions for up to possibly three

years. For consumers now, though, the energy rating of the white good they wish to purchase can have a considerable impact on their decision. It is wrong therefore to simply assume that because there appears to be little demand for home energy audits at the present that there will be no use made of them if they became a part of the home-buying/selling process.



FRIENDS OF
THE EARTH
SCOTLAND

Kirstie Shirra, Parliamentary Officer June 2002

Friends of the Earth Scotland and the
Association for the Conservation of Energy
72 Newhaven Rd, Edinburgh, EH6 5QG

Tel: 0131 554 9977, Fax: 0131 554 8656

E-mail: info@foe-scotland.org.uk

Website: www.foe-scotland.org.uk

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