Energy Action Scotland (EAS) is the Scottish charity with the remit of ending fuel poverty. EAS has been working with this remit since its inception in 1983 and has campaigned on the issue of fuel poverty and delivered many practical and research projects to tackle the problems of cold, damp homes. EAS works with both the Scottish and the UK Governments on energy efficiency programme design and implementation.

EAS will limit its comments on the Infrastructure and Capital Investment Committees call for evidence on the Housing (Scotland) Bill to those questions relating to energy efficiency and fuel poverty. EAS welcomes the opportunity to respond to this consultation.

Part 1: Right to Buy

EAS is supportive of the abolition of the Right to Buy for social housing tenants. The changes to the make-up of housing tenure over the last 30 years has seen more and more homes moving from the social sector to the private sector. In the 1980’s the social housing sector accounted for around 70% of all homes in Scotland while the private and private rented sector accounted for 30%. This has changed dramatically with the position reversed with 70% of all homes now being in the private or private rented sectors. This is placing a significant amount of pressure on social housing providers who find that demand for housing is outstripping their ability to supply. While at the same time, mixed tenure estates make the provision of energy efficiency works to tackle fuel poverty very difficult when owners fall into the asset rich capital poor category.

During this time of changing housing market, levels of fuel poverty have remained almost static. While significant improvements in the energy efficiency of the social sector have taken place, there is not the same level of improvement in the other sectors. EAS believes this is due to many people who bought their homes under the Right to Buy scheme being asset rich but capital poor. That is they can afford a mortgage but not the costs of repairs or maintenance of their homes. Since 1999 successive Scottish Government fuel poverty and energy efficiency programmes have been targeted at the private and private rented sectors to support those living in energy inefficient homes.

A repeal of the Right to Buy would prevent further homes being taken into the spiral of owners being trapped in having money to pay a mortgage but no money for improvements or maintenance. This may ease the call on funding from Scottish Government fuel poverty programmes in the shorter term and make the introduction of energy efficiency standards in the private and private rented sectors easier.
Part 3: Private Rented Housing

EAS is a member of the Scottish Governments Sustainable Housing Strategy Group and of the Regulation of Energy Efficiency in the Private Sector Working Group (REEPS). EAS believes that ultimately there has to be an energy efficiency standard in force for the private and private rented sectors if we are to achieve the eradication of fuel poverty and meet climate change targets. It is a disgrace that homes with exceptionally poor levels of energy efficiency, poor heating systems, and that are poorly maintained can be offered for rental. This needs to be addressed as a matter of urgency.

EAS is also supportive of the Electrical Safety Councils proposals for the introduction of mandatory electrical safety inspections in private rented housing. It supports the call for the introduction of a requirement for five yearly checks, by a registered electrician, of both fixed electrical installations in all rented property and any electrical appliances supplied with lets.

Part 4: Letting Agents

EAS is supportive of the power to establish a registration system for letting agents. It is important that anybody involved in renting out homes in any sector have a Code of Conduct and a system of redress for those whom it serves when that service is below statutory requirement.

Part 6: Private Housing Conditions

EAS views are stated in reply to the questions in Part 3 of the call for evidence.

Energy Action Scotland
27 February 2014