Draft Climate Change

Dundee City Council
(Neighbourhood Services Department – Housing Investment Unit)

I am writing to you on behalf of Dundee City Council (DCC) to provide evidence in relation to section 8 of the Draft Climate Change RPP3 which addresses the residential sector. The following comments relate specifically to the role played in Dundee by HEEPS:ABS funding in achieving Climate Change objectives and alleviating Fuel Poverty.

Although HEEPS:ABS funding can be directed to any private sector owners/tenants in Dundee who are at risk of Fuel Poverty, DCC has made the decision to utilise the funding to pay for the cost of External Wall Insulation (EWI) for private sector householders in ex-DCC blocks of flats which are either of solid-wall or non-traditional construction. By combining the HEEPS:ABS funding with the Council’s own capital budget for the Council-owned flats within these blocks, it has been possible to externally insulate whole blocks and, indeed, entire estates throughout Dundee. The overall scale and detail of this endeavour was seen by MSPs from the Economy, Jobs and Fair Work Committee on a visit to Dundee on 9th January, 2017. They saw first-hand that, as well as improving the energy efficiency of the flats (thereby helping the Council flats reach EESSH), the works have improved comfort levels within homes, saved residents money on fuel bills and transformed the overall appearance of the areas treated. A further benefit is in the provision of local employment opportunities.

DCC is very keen to continue with its current approach until all solid-wall and non-traditional flats have been insulated. However, current HEEPS:ABS levels suggest that it will not be able to do so before the EESSH deadline in 2020 as there are simply too many private flats that require HEEPS:ABS funding within the DCC stock. The Council has allowed for sufficient budgets for its own stock in this timescale but external insulation cannot proceed unless all flats are included – without HEEPS:ABS funding it is very unlikely that owners would be prepared to pay even a contribution towards their share of costs. Any diminution of the HEEPS:ABS budget would simply exacerbate this situation so DCC would appeal to the Scottish Government to retain allocations at recent levels as an absolute minimum.

As it is, even with the work being fully-funded there have been 4 instances where private residents have refused to let the work proceed and this has resulted in 4 blocks (27 flats) being deleted from our programme and going uninsulated. Our best efforts at emphasising the benefits have proved fruitless and it would appear that the only route to resolution would be to carry out a ballot according to the method prescribed in the Tenement Management Scheme. However, there is no guarantee that this approach would result in the positive result required, even where we know in advance that a majority verdict will be obtained. This is because residents have the right of appeal to the Sheriff after the ballot and, to the best of our knowledge, there have been no recent cases like this which would indicate the likely view that a sheriff would take – to uphold the consenting owners’ and tenants’ right to affordable warmth or the dissenting owners’ right to retain the historic appearance of the building fabric. Any assistance the Scottish Government can give in resolving this
situation so that the majority who want external insulate can get it would be very welcome.

A further benefit of the area-based schemes is the potential it offers for employment opportunities at scale. However, the labour supply, including ancillary services, needs to be developed at sufficient speed to ensure that the insulation schemes can be resourced. A particular issue that has been encountered in Dundee is in relation to SGN. We try to project plan our schemes so that SGN are on site at the optimum point in the installation process for the relocation of external gas risers around the insulation boards. In spite of giving them several months’ notice of our locations for our 2015/16 EWI programme and being given their agreement that they would synchronise with the programme, they then told us at the last minute that they did not have the labour resource to assist us. This resulted in the loss of several weeks in identifying and engaging an alternative contractor. As EWI is weather dependent (i.e. ‘wet’ stages of the process cannot be carried out below a set temperature) it is best installed during warmer months but lost time pushes the programme into the winter months thus exacerbating delays and making it hard to achieve completion of works and spend of budgets.

Similarly, whilst DCC is always grateful for additional allocations of HEEPS:ABS funding through the course of the year (usually from redistribution of unspent monies from other Councils) and always manages to pull out all of the stops to ensure spend, the stop-start nature of funding makes it very difficult to run projects as smoothly as possible in the way we could if we knew our overall budget at the beginning of the year. Therefore, we would appeal for more certainty and would welcome the kind of multi-year funding that has been suggested for SEEP.

In summary, DCC is convinced of the multiple benefits that accrue from the HEEPS:ABS approach in general and the specific approach taken in Dundee and would urge the Scottish Government to allow the continuation of such a successful scheme (which has so far managed to externally insulate in excess of 2,000 properties) and assist where possible in making the improvements suggested above that could make it even better.

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