LOCAL GOVERNMENT AND COMMUNITIES COMMITTEE

FUEL POVERTY (TARGET, DEFINITION AND STRATEGY) (SCOTLAND) BILL
CALL FOR VIEWS

SUBMISSION FROM RURAL HOUSING SCOTLAND

Responses to Questions

1. Do you agree with the Scottish Government’s proposal to provide for a statutory target to reduce fuel poverty to no more than 5 per cent of Scottish Households by 2040.

We agree with the proposal to provide a statutory target.

However, the focus on setting a target that is achievable has had the effect of setting a target that is not overly ambitious. That there will be no more than 5% of households in Fuel Poverty by 2040 represents a reduction of ~1% per year. In comparison, the two years 2014 to 2016 saw the number of households living in Fuel Poverty decrease by 200,000 (~8%).

We would suggest either an ultimate target of eradicating fuel poverty by 2040 or achieving the 5% target by 2030.

Rural Housing Scotland absolutely welcomes that “the principle of social justice and creating a healthier, fairer and more equal society, irrespective of whether individuals live in urban or rural Scotland” underpins this Draft Fuel Poverty Strategy. We would therefore like a commitment that the practicalities and costs of operating in rural and island areas do not result in these communities being identified as the 5% undeliverable demographic.

2. Do you agree with the Scottish Government’s proposals for a revised definition of fuel poverty?

Rural Housing Scotland supports the proposals for a revised definition of fuel poverty and we strongly approve the proposal of Fuel Poverty assessment being based on income after housing costs. This change reinforces the concept of having a warm home as a basic human right.

Whilst we support the use of a MIS, we cannot support the use of a UK MIS without a rural and islands enhancement. We note in the Technical Annex of the Draft Fuel Poverty Strategy that “For remote rural households, the way fuel poverty is calculated already takes account of regional variations in external temperatures, solar irradiance and exposure to the wind as well as types of stock and information about occupants. These can lead to greater energy usage estimates to maintain either standard or
vulnerable heating regimes in rural and remote rural areas”. However, as the general increased living costs for rural and island areas are not included, it is likely that the identified levels of Fuel Poverty in Scotland won’t represent the actual figure. This will result in households becoming “hidden fuel poor”.

3. Do you agree with provisions in the Bill requiring the Scottish Government to publish a fuel poverty strategy? Do you also agree with the consultation requirements set out in relation to the strategy?

We commend provisions in the Bill requiring the Scottish Government to publish a fuel poverty strategy as an important step in tackling fuel poverty.

Rural Housing Scotland fully expects that an Islands Impact Assessment is carried out prior to the Bill being considered by Parliament. We would strongly welcome an Impact Assessment on rural and remote rural Scotland, too.

The inclusion of reference to the requirement for consultation with “such persons as they consider appropriate” is to be supported.

Whilst there are representative organisations that are members of the Scottish Fuel Poverty Advisory Panel and Partnership Forum, we would encourage the level of engagement and consultation with “individuals who are living, or have lived, in fuel poverty” to be increased to ensure as large an input from those with first hand experience as necessary. This could involve working closely with the Third Sector to utilise their localised knowledge and relationships.

4. A draft fuel poverty strategy was published alongside the Bill on 27 June. Do you have any views on the extent to which the measures set out in the draft Fuel Poverty Strategy for Scotland 2018 will contribute to meeting the Government’s new target? Have lessons been learned from previous initiatives?

Rural Housing Scotland support the key principles underpinning the strategy (social justice, addressing all four drivers of fuel poverty, building on the assets of individuals and communities and focussing on early intervention and prevention.

However, we are concerned that without addressing the use of the UK MIS and without conducting a robust Islands Impact Assessment and an Impact Assessment on rural and remote rural Scotland, the level of fuel poverty in these areas will be inaccurate and result in them not receiving the resources they need. Therefore, whilst the Government may meet its target, it will be based on data excluding the hidden fuel poor.
5. Do you have any views on the Scottish Government’s reporting requirements to the Scottish Parliament, as set out in the Bill?

We agree that the strategy should be long term but would recommend that the Bill goes beyond requiring the Scottish Government to provide updates on progress every 5 years. The 5-year updates should be replaced with the requirement to review and update the strategy with regular interim progress reports.