LOCAL GOVERNMENT AND COMMUNITIES COMMITTEE

FUEL POVERTY (TARGET, DEFINITION AND STRATEGY) (SCOTLAND) BILL

call for views

submission from west dunbartonshire council

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.

please explain your reason why. for example, is the statutory target necessary? is the target ambitious enough? is it realistic and achievable?

setting a target is necessary in order to work towards achieving the ambition and essential to allow monitoring of progress. it may perhaps be more achievable in some locations than others due to levels of deprivation, property types/mix and income levels/unemployment. also although 5% is more realistic than eradication there are concerns that the trend may not reflects this. successive results of the fuel poverty levels show a steady increase even after significant improvements in la housing over the recent years, with an expectation that this may have had an impact, perhaps it’s too early to show yet?

in terms of being realistic and achievable there are a number of significant challenges particularly around the technical feasibility of insulating hard to treat properties. in wdc we have 39 different house types and it may be difficult to achieve the aspirational EPC bandings in a number of these. it may also be worth noting that the aspirational EPC targets particularly in social housing are challenging given that they are based on energy efficiency measures that are as yet not fully developed/readily available, e.g. hydrogen fuel.

it is also worth noting that Local authorities can only contribute to property improvements, assist with advice on energy efficiency and help maximise benefits or give financial/debt advice, but can’t influence energy costs or household incomes.

section 2 makes provision for a proposed definition of fuel poverty which calculates the proportion of household income required to maintain a satisfactory level of heating and assesses the extent to which households can then maintain an “acceptable standard of living” once housing and fuel costs are deducted.

2. do you agree with the scottish government's proposals for a revised definition of fuel poverty?

please explain your reasons why. for example, will the new definition ensure that the scottish government will focus their efforts on those with the greatest need?

WDC agree with the proposal to redefine the definition of fuel poverty which should help target those most in need and support the inclusion of a fourth factor, how energy is used in the home. however we do have concerns that it does not become
overly complex and difficult for some to understand, such as the proposal to utilise a cost analysis on fuel, housing costs, council tax, water rates and childcare.

We also would encourage a degree of regulation around the way the fuel poverty definition is assessed and by whom. Delivery by a recognised impartial advice service would seem to be a sensible approach as there may be a significant number of vulnerable people who are currently struggling to heat their homes, but lack the knowledge and support required to address this. The use of independent/impartial advisor for the assessment of the extent of fuel poverty will allow, where appropriate, some flexibility in the assessment to include those who may not meet the fuel poverty criteria, but personal circumstances leave them vulnerable; for example those with fuel debts.

Sections 3-5 requires the Scottish Government to publish a fuel poverty strategy within a year of Section 3 of the Bill coming into force. It requires them to consult on the strategy, which must include individuals who are living, or have lived, in fuel poverty.

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?

Please explain your reasons why.

We agree with the proposal requiring the Scottish Government to publish a fuel poverty strategy particularly with the consultation requirements set out in relation to the strategy. Getting the views of those who are or who have lived in fuel poverty will identify the main characteristics and challenges associated with fuel poverty and will lead to a better understanding of the issue, what has and is being encountered by these individuals and hopefully help in targeting solutions. We would be interested to get more detail on the approach and level of participation and information on the content of consultation.

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?

Although we believe that some lessons have been learned this is perhaps more to do. There have been a number of successful schemes in the past including the Home insulation scheme (HIS), the warmer homes Scotland scheme. The area which perhaps needs to be reviewed is how the assessments and delivery of future schemes are carried out. We believe that an overly complicated scheme could be destined to fail if the necessary information is not readily available, e.g. Information on fuel use by address and other relevant local characteristics and information.

Sections 6-9 require the Scottish Government to report to Parliament every five years on: the measures taken to tackle fuel poverty over the previous five years;
progress made towards the 2040 target; and the steps Scottish Ministers propose to take over the next five years to meet the 2040 target.

5. Do you have any views on the Scottish Government’s reporting requirements to the Scottish Parliament, as set out in the Bill?

The reporting requirements will allow the Scottish Government to monitor progress towards their targets and allow for timeous interventions and changes in strategy if and when required.