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.**

The proposed target to have no more than 5% of households in Scotland in fuel poverty would be ambitious and challenging. It is considered that a statutory target is necessary to provide a defined outcome for national and local strategy with the expectation of consistent delivery across Scotland. It could be achievable in the right conditions, with continued prioritisation of fuel poverty at all levels and appropriate investment in measures to achieve the target. In terms of home energy efficiency, social housing will be required to achieve Energy Efficiency Standard for Social Housing targets, yet it is unclear how this will be funded. A lack of additional funding is likely to affect rental affordability which will subsequently impact on fuel poverty levels. There is need to introduce similar standards for private housing to improve the sector at the same pace, however this is also unlikely to be achieved without direct support. We note that the Scottish Government acknowledges that two main drivers of fuel poverty are out of their control however this is likely to become a barrier to meeting the target. Potentially further focus needs to be placed on controlling fuel prices or providing alternative (cheaper) renewable energy sources; and addressing the impacts of welfare cuts, maximising household incomes to ensure that energy is affordable and incomes keep pace with inflation.

In the Fife context, there has been some progress with the latest published figures from the Scottish Housing Condition Survey 2014-2016 showing a reduction of 5%, from 40% (66,000) to 35% (57,000) of households in Fife in fuel poverty and a 1% reduction in levels of extreme fuel poverty, from 9% (16,000) to 8% (13,000).¹ Fife Council’s commitment to addressing fuel poverty is reflected in the Plan for Fife 2017-27 and the Fairer Fife Action Plan. The Local Housing Strategy sets out outcomes that ‘as far as reasonably practical, people do not live in fuel poverty’ and ‘the impact of poverty on people’s housing circumstances is minimised’. The established partnership collaboration between Fife Council, Cosy Kingdom partnership and others plays an important role in tackling and reducing fuel poverty in Fife. Fuel poverty in Fife is treated as part of a wider agenda for addressing poverty. We would welcome the introduction of a revised target for Scotland, providing this is addressed collaboratively at national and local level and with joint commitment and investment to achieve the outcome.

¹ Scottish House Condition Survey Local Authority Statistics 2013-15, 2014-16
2. Do you agree with the Scottish Government's proposals for a revised definition of fuel poverty?

The proposed definition will provide improved clarity and the targeting of households on lower income is welcomed. We note this is being reinforced with more detailed definitions and precise measures for calculating terms such as “housing costs” and “childcare costs”. This transparent calculation/formula should ensure consistency in the measurement of fuel poverty across Scotland. Key challenges lie in the fuel poverty experienced by older people, households in rural areas and in the private sector. Therefore we welcome the proposal to include into the definition/calculation other benefits/income and costs associated with disabilities, age, vulnerability, health etc.

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?

A national fuel poverty strategy would be essential to provide local authorities with a clear framework for establishing local fuel poverty strategies to deliver change in line with the revised definition of fuel poverty. However, it will be important to emphasise the differences in local demographic profiles, rural/urban situations, tenures, health, social care and other economic factors. The proposal to consult with individuals who have, or have previously lived in fuel poverty may be difficult to achieve – people generally do not identify themselves, or want to be identified, as fuel poor. However an aim to be inclusive and to hear views from those most affected would be the correct approach irrespective of the challenges.

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?

The draft strategy confirms the intention to improve energy efficiency in all homes across Scotland including in the social, private rented, owner-occupied sectors. There should be advice and support given to local authorities to assess the resources required to achieve targets across all tenures so that the scale of operation can be understood and built into strategic plans. Stronger links between Home Energy Scotland and local partners would enhance delivery of the fuel poverty strategy.

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

The draft fuel poverty strategy suggests five-yearly reporting on overall fuel poverty levels which seems reasonable. Local authorities would wish to monitor progress more frequently through the Scottish House Conditions Survey and other energy efficiency reporting. It will be important to understand the contribution of local partnership working, such as the contribution made to the overall target by for example home visits, fuel advice, uptake of switching initiatives, income maximisation, etc.