

**SUBMITTING EVIDENCE TO A SCOTTISH PARLIAMENT COMMITTEE
DATA PROTECTION FORM**

Name:	Katy Dickson
Date:	9 November 2019
Organisation: (if required)	Scottish Land & Estates
Topic of submission:	Fuel Poverty (Target, Definition and Strategy) (Scotland) Bill

I have read and understood the privacy notice about submitting evidence to a Committee.

I am happy for my name, or that of my organisation, to be on the submission, for it to be published on the Scottish Parliament website, mentioned in any Committee report and form part of the public record.

I would like to be added to the contact list to receive updates from the Committee on this and other pieces of work. I understand I can unsubscribe at any time.

Non-standard submissions

Occasionally, the Committee may agree to accept submissions in a non-standard format. Tick the box below if you would like someone from the clerking team to get in touch with you about submitting anonymously or confidentially (not for publication). It is for the Committee to take the final decision on whether you can submit in this way.

I would like to request that my submission be processed in a non-standard way.

LOCAL GOVERNMENT AND COMMUNITIES COMMITTEE

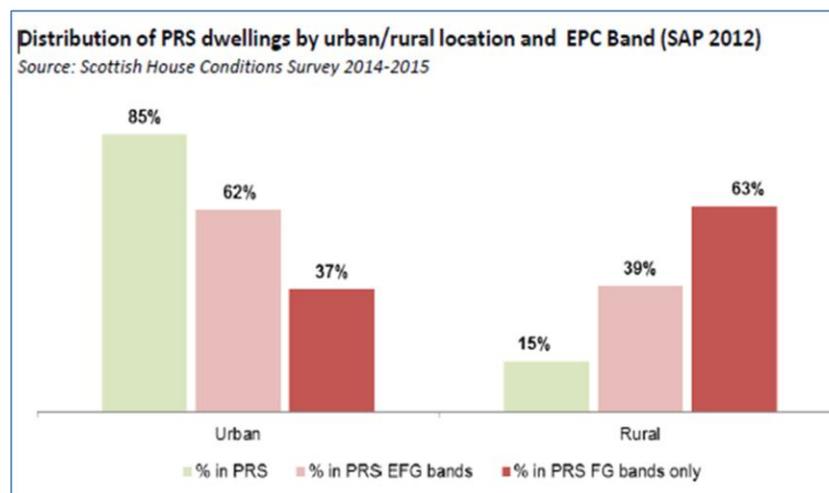
FUEL POVERTY (TARGET, DEFINITION AND STRATEGY) (SCOTLAND) BILL CALL FOR VIEWS

SUBMISSION FROM SCOTTISH LAND & ESTATES

Scottish Land and Estates (SLE) is a membership organisation representing the interest of land owners and land-based businesses in rural Scotland. SLE sat on the Rural Fuel Poverty Task Force and Regulation of Energy Efficiency in the Private Sector (REEPS) stakeholder groups.

Our members own and manage the majority of let rural property and they are currently preparing for the introduction of minimum energy efficiency standards in the private sector. We welcome the continued efforts the Scottish Government is making to reduce fuel poverty and the shift of policy focus from processes and inputs towards policy impacts.

Our members' properties are of mixed type but the predominant characteristics are detached, off gas-grid, pre 1919, stone and slate. These characteristics result in the Scottish House Condition Survey finding 62% of EPC F and G rated properties are in rural areas while only 15% of the PRS properties are in these areas.



We welcome the aims of the Bill, particularly that support will be focused on those who need it most regardless of where they live.

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 Scottish Government was required to eradicate fuel poverty as far as was reasonably practicable by November 2016, according to the Housing (Scotland) Act 2001. This statutory duty expired, and the target was missed. It is important that any new target is ambitious but achievable with robust long-term policies and support in place.

SLE advocates the ambition to reduce the number of people struggling to afford to live in comfortable temperatures in their homes after taking reasonable measures to improve their

circumstances. However, based on current and planned interventions we do not think the new target is achievable and a fresh, more holistic approach is required. We are also concerned that the 5% of Scottish Households who remain in fuel poverty once the target has been met will be the most remote rural households. We would welcome further commitment that these properties are not deemed to be 'too difficult' or 'too expensive'.

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

SLE supports a revision to the current fuel poverty definition. However, the new definition continues to raise concerns. As an organisation, we do not claim to be experts in this area, however, the below issues strike us as important to raise.

In our response to the Consultation on a Fuel Poverty Strategy we explained it remains almost impossible for a householder, or those working with the householder who could refer them as fuel poor, to know if they are in fuel poverty. While it is accepted that a simple definition would not be reflective of reality, a mechanism to help overcome this complexity would be welcomed.

We support the use of Minimum Income Standard but there must be adjustment to reflect the higher costs of living, including higher fuel costs, experienced in rural areas. In 2016 HIE reported that to achieve the same standard of living in remote and rural Scotland typically requires between a tenth and a third more household spending than in urban areas of the UK. The Rural Fuel Poverty Taskforce recommendations on this should be applied.

We urge Scottish Government to take cognisance of the academics working in this field through Fuel Poverty Research who have also raised this concern about the lack of adjustment to reflect rurality in the Bill (<http://energypovertyresearch.blogspot.com/2018/06/open-letter-need-for-adjustment-for.html>).

Many occupants, by choice, will not be heating their homes to the temperatures or times that are noted in the bill and the initial reaction from many people is that the hours and temperatures are excessive. As we also noted in our response to the Consultation on a Fuel Poverty Strategy we believe while efforts need to be made to reduce fuel consumption and bills it would seem appropriate for one of the first steps to be to ensure behaviour changes such as wearing warm clothing, switching suppliers, forming oil buying clubs, and understanding heating controls is encouraged. We must also encourage households to have good air quality which will mean ventilating their homes. This may result in drops in temperature.

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?

SLE Supports the provisions in the Bill requiring the publication of a fuel poverty strategy. This needs to be a long-term strategy that is regularly reviewed and aligned with other strategies where possible. It is important that at each regular review, the policies are assessed to ensure they are properly aligned and delivering the required outputs.

Progress needs to be measured on the impact interventions have on households. In the past success have been on matters such as number of measures installed while in practice these measures were often inappropriately installed and made little difference to the efficiency of the property or comfort of the occupier.

We welcome, but have no strong views, on the consultation requirements.

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?

As noted in our answer to questions 1 we believe current policies are not enough to achieve the targets. SLE's experience is with the rural private rented sector. Our members are keen to improve the energy efficiency of the homes they let but the policy detail is currently unknown and they are often not eligible for, or incentivised by, support mechanisms. With minimum energy efficiency standards from 2020 it is vital that landlords have the policies providing them with certainty, information and support as early as possible.

Home Energy Scotland is a great one stop shop but is currently under resourced to deliver the support required to private landlords. These advisers also need to be provided with the appropriate tools to help intervention where required – for example, reliable EPC methodology and appropriate funding streams.

We have ongoing concerns that measures to tackle the energy efficiency element of fuel poverty are based on 'the average' rather than the worst performing properties. For example, in the PRS modelling average costs to reach EPC E and average length of tenancy are used. This does not reflect the high costs and long occupations experienced in the properties most affected by poor energy efficiency.

Where there are financial support schemes in place these tend to focus on where measures can be delivered most cost effectively rather than actually on the most vulnerable or worst performing properties. This often results in the most rural properties and occupants missing out. There remains an issue with the cost of renewable energy technologies which would alleviate fuel poverty for many households. There also remains problem that tenants and housing support payments do not usually consider the value of an energy efficient home when renting a property.

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

We support the reporting requirements but have no strong views on this.