

**LOCAL GOVERNMENT AND COMMUNITIES COMMITTEE**

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

**SUBMISSION FROM WEST LOTHIAN 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?**

West Lothian Council fully supports and welcomes the Scottish Government's proposal to reduce fuel poverty. The council does believe that the following matters should be considered before setting a statutory target which may impact on the Scottish Government being able to meet any statutory targets being set:

It is stated in the Financial Memorandum in support of the Bill in paragraph 6 that;

“The UK Government's austerity programme, the economic uncertainty caused by the EU Referendum result and rising fuel prices make eradicating fuel poverty an increasingly difficult challenge. The Scottish Government also recognises that many of the necessary levers for change are not devolved under the current constitutional settlement. Specifically, the cost of energy is out with the powers of the Scottish Government and there are limited ways that it can directly influence salaries (through the real living wage) and working age benefits. In order to make a significant impact on the eradication of fuel poverty, incomes need to be rising at least the same rate as energy bills.”

As the Scottish Government already recognises it has very limited control over two of the main aspects driving fuel poverty, energy prices and income, the intention of setting a statutory target, whilst ambitious, may not be recognising that key factors are almost wholly out with the influence of the Scottish Government. West Lothian Council agrees that steps should be taken to eradicate fuel poverty; it does so, taking into account that without full control over the influencing factors, it has no control over any target being met. It would be helpful therefore if the Scottish Government could outline what powers it will be able to use to achieve any statutory targets it sets.

Similar to the updated compliance targets set out in the Energy Efficiency Standard for Social Housing to 2032 (EESH2) Consultation; West Lothian Council would suggest that efforts to eradicate fuel poverty are based on “maximising efforts” to ensure that Scottish Government and local authorities have done all that is reasonably possible to do to help eradicate fuel poverty.

West Lothian Council believe that the target date of 2040 (and reporting date of 2042 as detailed in the Bill summary due to Scottish Housing Regulator reporting timescales) is too long and the target date should be 2030 to closer align with other efforts to improve energy efficiency in the housing stock. It is also important to

recognise that achieving the target by 2040 could still see a generation of households in fuel poverty and again every effort should be made to shorten the target timescale.

Whilst the council recognises that meeting the proposed target would require advancements in low carbon heating technology, this should not be a factor in delaying the target date. If a “maximising efforts” focus was adopted, this would more easily allow for technological advancements to be incorporated into monitoring performance whilst also providing a more transparent and honest approach. Continuing investment in heating and energy efficiency will help in relation to fuel poverty and climate change.

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

Every household should have the right to a healthy and dignified life that allows them to participate fully in society. This also means that every household should be able to use adequate levels of fuel to sustain a warm and dry home.

The council agrees with the proposed revised definition as it recognises the important work performed by the independent working groups: the Scottish Fuel Poverty Strategic Working Group and Scottish Rural Fuel Poverty Task Force. The council also agrees that the new definition will better target and support those with the greatest need. This includes younger people, those renting their homes and those who use electric heating. West Lothian Council also recognises the importance of excluding higher income households that are included in the current definition. There is a need to give more consideration to older people who have paid off mortgages and live in energy inefficient houses and pay high fuel costs.

**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?**

Whilst the council agrees that a clearly defined and detailed strategic approach needs to be developed and implemented it would argue that it should be as part of a larger strategic approach to addressing poverty in general. Whilst the draft strategy recognises the interaction of fuel poverty with wider issues such as social justice and impacts on health; there needs to be clear lines of interaction and support with other measures to address poverty. A new fuel poverty strategy must address all the drivers of fuel poverty, as improving energy efficiency alone will not end fuel poverty in Scotland.

The council agrees that the consultation on any strategy must include individuals who are living, or have lived, in fuel poverty. Although not stated in the Bill, it is assumed that the consultation will be open to the public to provide comment.

**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 most recent target for eradicating fuel poverty, as set out in the Housing (Scotland) Act 2001, failed to be achieved by a significant level, it is important that appropriate lessons are learned from this. It is noted that the Scottish Government recognises it has limited control over the two main factors influencing fuel poverty, energy prices and income, and taking this into account it is reasonable to acknowledge that this lack of control does affect the ability of the Scottish Government to meet any statutory targets it sets itself.

West Lothian Council suggests that the draft strategy better supports a "maximising efforts" approach in its current form than supporting a statutory target. We would therefore argue that the setting of a statutory target, whilst not being in control over the determining factors, is not helpful and that recognition needs to be given to the fact that changes currently out with the control of the Scottish Government will determine if any target can be met.

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

Based on the proposed timeframe to 2040 the council would agree with the proposed reporting requirements as described in the Bill. However, as previously stated West Lothian Council suggests that the timeframe of 2040 is too long and that this should be brought forward to 2030 to align with other efforts to improve energy efficiency in the housing stock. With a timeframe of 2030 periodic reporting of every five years would not be sufficient, as it would only provide an interim and then final report, which would not provide Scottish Government and Local Authorities appropriate timescales to react. Consideration should be given to the reporting requirement being every 2 or 3 years.