

LOCAL GOVERNMENT AND COMMUNITIES COMMITTEE

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

**SUBMISSION FROM EAST AYRSHIRE HEALTH AND SOCIAL CARE
PARTNERSHIP**

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 more challenging five per cent target proposed in the Bill is to be welcomed as an improvement on the previous ten percent measure. The policy intention is also welcome in terms of aspiration that 'everyone in Scotland should have the right to live in a warm, comfortable home'. Placing this on a statutory footing was a recommendation of the Working Group and Task Force and the proposed legislation accords with this expert view.

There has been improvement in fuel poverty in recent years but household surveys indicate that fuel poverty remains at over one-quarter (almost 650,000 households nationally). Similarly, the regard to 'other reasonable fuel needs' is a positive addition.

There could be more ambition in relation to the level of reduction and the timescale as the absolute number remaining in fuel poverty at the five percent level is substantial and over a further two decades. The proposed target would equate to around 140,000 households in 2040. There is a close relationship between fuel poverty and poorer health and wellbeing – physical, mental and social. Excess winter mortality in East Ayrshire in 2017/18 numbered 100 across all ages and social policy interventions, such as the Winter Fuel Payment, have been linked to significant reductions in excess mortality over time. Evidence of potential effectiveness from such interventions makes 2040 appear relatively distant. The aggregate measure could also leave substantial variation across communities and, in particular, rural and former industrial communities where fuel costs can be significantly higher. The most recent analysis for 2014-16 Scottish House Conditions Surveys shows a level of fuel poverty for East Ayrshire of 38 per cent of all households (equating to 21,000 homes). It will be important for the non-statutory milestone proposed to be sufficiently challenging.

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

The definition of an 'acceptable standard of living' after housing and fuel costs is again to be welcomed. This fits with the wider human rights-based policy context

and in relation to fuel poverty relates to fundamental human needs. Hence a shift to an After Housing Costs (AHC) definition is in keeping with the wider approach and a focus on the health and wellbeing impacts of fuel poverty. The inclusion of 'other reasonable fuel costs' is welcome. The revised definition is narrower and reduces the number of homes deemed to be in fuel poverty and this seems to affect quite low-income bandings. As at (1) above, we would wish to see further consideration of the issue of rurality where it is not uncommon for households to be older, less energy efficient or 'off-grid' in terms of fuel supply (particularly for gas supply which affects 6% of East Ayrshire households) and for the costs of necessities to be considerably higher. The higher costs of pre-payment meters and the association between these and lower income households should be taken into account as this compounds fuel poverty. The use of the Minimum Income Standard would not seem to fully reflect additional fuel costs linked to rurality. The 'household behaviour' element would need to be carefully approached to ensure that the main drivers of fuel poverty – household income, energy efficiency of homes and energy prices – are kept as the main focus.

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?*

The production of a fuel poverty strategy would be necessary for the delivery of the statutory target. As at (1) above this also accords with the recommendations of the Working Group and Task Force. The requirement to consult with people who have lived experience of fuel poverty will be essential to the production of such a strategy and fits with the general co-production approach taken across public services in Scotland in recent years. The production of the fuel poverty strategy should be mindful of alignment with other policy drivers and seek to minimise the proliferation of action plans. Linkage to strategies and initiatives around affordable energy and energy efficient homes will be critical given the major influence of the price of domestic fuel on progress against any statutory target. The potential Energy Efficient Scotland Bill trailed in the draft Fuel Poverty Strategy for Scotland would be a case in point and the proposed 'Public Energy Company'.

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 range of measures set out in the draft Strategy is coherent and taken together should contribute to the proposed statutory target. Interim milestones, a public energy company and advice and support are key elements in addressing the recognised drivers of fuel poverty.

Reporting on partnership working, identifying household types at particular risk of fuel poverty and plans for achieving the end-target is to be welcomed. A focus on rurality and vulnerability would be welcome here given that these factors have not been brought into the revised definition.

The proposed 'targeting' of support in the draft Strategy should not lose sight of the importance of universal approaches to maximising up-take. The concept of progressive universalism should be maintained to avoid potential for reinforcing stigma in relation to fuel poverty.

The 2031 review timescale seems long and more frequent progress review could be considered.

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

There is clearly a need to report to Parliament on progress against such a statutory target. The five-yearly reporting requirement would fit with the 2040 end-point, however, more frequent or possibly themed reporting would reflect the importance of the policy-area. This would link to the draft Fuel Poverty Strategy intentions to establish non-statutory interim targets and milestones at 2030 and 2040 to measure progress.