



Housing to 2040 Consultation

A response from Energy Action Scotland

28 February 2020

Energy Action Scotland is the Scottish charity dedicated to ending fuel poverty. Energy Action Scotland has been working with this remit since its inception in 1983 and has campaigned on the issue of ending fuel poverty and delivered many practical as well as research projects to tackle the problems of cold, damp homes. Energy Action Scotland works with both the Scottish and the UK Governments on energy efficiency programme design and implementation.

Energy Action Scotland welcomes the opportunity to respond to this Call for Evidence. Given its remit, Energy Action Scotland's response focuses primarily on those areas that it considers may impact most on fuel poor and vulnerable consumers.

Fuel poverty impacts directly on health. Its effects are felt across our health and social care services from bed blocking (where people cannot be returned to cold, damp homes or homes with no power), to primary care which sees a 19% increase in attendance at GP from older people with respiratory illness for every degree the temperature drops below 5 degrees centigrade. Fuel poverty leads to cold, damp homes and with 4800 excess winter deaths in 2017/18, 35% of these caused by respiratory diseases, having warm, affordable homes will help to mitigate these adverse impacts on health.

Fuel poverty should not exist. It is a fundamental necessity in every person's life to have a warm, dry home which is affordable to heat. Energy Action Scotland believes that having a warm, dry home is a human right, which the Universal Declaration of Human Rights Article 25 makes reference to. In this day and age, people should not have to decide between heating their home or feeding themselves and their family.

Energy Action Scotland welcomes the Scottish Government's new approach Housing to 2040, which will set out a long term vision of how it wants houses to improve by 2040.

PRINCIPLE 4

Housing provision should be informed by whole life economic costs and benefits in the round and help to address inequalities in health, wealth and education.

Homes in the future and existing homes improved to meet challenging targets around energy affordability and climate change need to remain healthy places to live. Condensation dampness and mould growth remain as an ever present risk in the homes of those who are unable to adequately heat, or ventilate.

Having a well-insulated home is only one of the mitigating factors in the complex relationship between occupant generated moisture and the negative consequences that result from condensation dampness. Without adequate awareness and advice provided to the occupant, there are some cases where improvements carried out with the best of intentions have left occupants with very poor indoor air quality and damage caused by the infestation of mould.

High performance modern homes with tightly controlled ventilation systems and even non-opening windows should be designed to cope with the normal daily loading of moisture in the home, some may also have features to cope with episodes of excessive moisture for short periods of time. Homes retro-fitted with energy efficient measures are more than likely not to have the amenity of such automated systems to manage the home environment.

Looking to a future where our homes are much more energy efficient places to live does come with some risk, whilst the automated systems of high specification modern homes may remove the need for the occupants to have due regard to how and where moisture can be released into the home, this cannot be confidently said of older homes that have been improved to a higher standard of energy efficiency. The drive to low carbon energy efficient homes carries a health risk that if not mitigated will have an impact on the places where we live, it is simply not safe to assume, even in modern high performance homes that occupants will fully understand their role in the control of condensation dampness and take corrective measures.

For these reasons the drive to zero-carbon and low energy cost dwellings must run alongside public awareness raising and education on what it means to live well within these new and improved homes. The importance of occupant behaviour being considered as a critical part of the health of a building is being recognised under standards such as PAS 2035:2019¹ for existing homes. This impact of place on human health is already a well-established relationship.

¹ <https://www.trustmark.org.uk/ourservices/pas-2035>

PRINCIPLE 6

Government policy should promote a greater diversity of home builders and broader availability of land for development to reduce prices and improve building quality.

Protections need to be adopted into the planning process to ensure that land released at a reduced price for low cost housing is in fact only used for that purpose. To ensure that communities have a healthy diversity built in, developers should have some flexibility to incorporate a proportion of low cost, mid-market and free market options in the planning phase. Land released under public subsidy for low cost rental purposes should always have the greater proportion in this mix.

Building quality should not be a function of price, all buildings whether £500 or £500k should all be built to a level of quality that protects the consumer's interests. It is dangerous to confuse the term "quality" in this to mean that you only get a well-constructed product if you pay more. Greater amenity of space, higher specification in building energy performance and material design can all increase the value of a property however, the quality of what is built should not be conditional on the £ per square metre purchase price. A one bedroom flat for low cost rent should have an acceptable quality of build which is of an equivalent standard to a 5-bed detached home for sale in the homeowner market. Principles 7 and 8 set out these aims for a universal approach to "quality".

PRINCIPLE 8

New homes for sale should be built to high standards, defects should be identified and remedied quickly and all owners should be required to maintain the condition of their home.

All new homes in the next revision of Scotland building standards should be built with the twin aims of both cost and carbon sustainability, where people live should not become a barrier to enjoying a reasonable standard of living. Thus, all homes built to utilise low carbon network connected electricity should have the capacity to contribute to a more dynamic networked energy management system. Buildings in the future should play an active role in the distribution, storage and generation of energy as part of a fully integrated energy system and not be viewed simply as an endpoint for consumption. The concept of a “prosumer” needs to be considered both from a planning perspective and also a building standards regulatory framework. In this way low income households of the future are able to make smart choices about their energy demands, and with the right conditions and resources within their homes, are able to play an active role in managing the effective cost per kWh for them for the amenity delivered by grid supplied electricity.

On a related matter, the deployment of smart homes and zero carbon buildings which is key to the Government’ aims on Climate Change relies heavily on the adoption of technology and appliances which will require many maintenance and replacement cycles over the lifetime of the building. Our current building standards system alongside our minimum energy performance standards for all tenures needs to be consistent in order for our lifetime emissions savings to confidently remain true over the lifetime of the building. If high specification buildings with significant reliance on the continued performance of low and zero carbon technologies are allowed to simply degrade over time, then any claims to zero carbon building by 2040 or 2045 will not be robust or demonstrable.

PRINCIPLE 9

Decisions around the quality, location and utilisation of existing stock and new build should be ambitious in enhancing biodiversity, promoting Scotland's energy security, and be consistent with the target for Scotland's emissions to be net zero carbon by 2045.

The existing housing stock is made more energy efficient, uses low carbon heat and is more efficiently allocated (e.g. so that people can live nearer their work, if that is what they want to do). New build homes are built so that they are net zero carbon (i.e. built to high standards of energy efficiency and use renewable heat or very low carbon heating), taking into account the natural resources consumed by the construction process too. Brownfield sites are prioritised and incentivised and the true value of green space is taken into account. There is more innovation in environmentally-friendly building and improvement techniques and materials, which are thoroughly tested before being implemented. All housing is resilient to the impacts of climate change, including minimising flood risk, and contributes to climate ready places and communities. Our homes, and the space around them, promote biodiversity by providing a variety of habitats and wildlife corridors. Fuel poverty has been eradicated.

Fuel poverty is unlikely and is in fact not planned to have been eradicated by 2040, as the main fuel poverty target set in the Fuel Poverty (Targets, Definition and Strategy) (Scotland) Act 2019 is for no more than 5% of households to be in fuel poverty by 2040.

Energy Action Scotland believes that the fuel poverty target date of 2040 is too far away to be meaningful for this vision of Housing to 2040. It condemns a further generation of Scottish households to a life of fuel poverty. In addition, we agree having more of the existing housing stock more energy efficient would be beneficial, however it needs to be kept in mind that energy efficiency alone will not eradicate fuel poverty, action must be taken on improving incomes, reducing energy prices, and managing energy use (also changing behaviour).

We suggest that having a warm home should have its own principle and be located in this section: Homes that meet people's needs. This should be a specific principle on having a warm home and how this impacts on people's health. Energy efficiency is very important however it is only part of the solution.

Energy Action Scotland feels that having a warm affordable home that is energy efficient and helps to reduce carbon emissions is of high importance and more emphasis should be placed on it. This should be front and centre of the Government's plans. There should be more emphasis on how this long-term vision can help people in fuel poverty.

Energy Action Scotland feels that there should be increased collaboration across sectors e.g. housing and health, and this joined-up approach would help to correct deficits.

PRINCIPLE 13

Government should ensure that there are affordable housing options across Scotland for households at all income levels.

Households at the lower end of the income distribution are offered assistance with housing and housing costs and households at the higher end can afford the home of their choice. Those in the middle can also afford housing appropriate for their needs, wherever they live in Scotland. Social housing is available across Scotland for people who need it and they can easily move home for work or personal reasons; nationally, we make best use of our social housing stock. The Private Rented Sector is the right size to provide quality, affordable and secure options for the households who want or need a rented home.

Service personnel are provided with the right support upon resettling in their community by local authorities and veteran organisations. Homelessness has been eradicated; people needing homes are found homes quickly.

Low cost rented housing needs to be recognised as fulfilling a social purpose, one which when that purpose is superfluous to the needs of the occupants, that those occupants are supported to be able to release the home for those in greater need. Mid-market renting offers a progression route from low cost rented property, and with proper safeguards for tenants, the private rented sector can also play a part in allowing this flexibility in housing provision at the lower end of the income distribution. Fuel poverty, whilst not exclusively a housing matter is now defined in a way to recognise housing costs as a factor. The Fuel Poverty (Targets, Definition and Strategy) (Scotland) Act 2019 defines fuel poverty as an “after housing costs” issue, in this way the cost of housing as it relates to a household’s income now become an important consideration in the policy for ensuring that by 2040, no more than 5% of Scotland’s household are living in fuel poverty.