



Scottish Government Housing Quality and Standard Team
Housing Quality and Standards
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Existing Homes Alliance Scotland comments on the Scottish Government proposal for a forum to enable consideration of a common cross-tenure house condition standard in Scotland

Dear Sir/Madam

Introduction

The Existing Homes Alliance Scotland (ExHAS) is a coalition of environmental, anti-poverty, consumer, and housing organisations who believe that urgent action is required to transform Scotland's existing housing stock in order to help tackle both fuel poverty and climate change.

The Sustainable Housing Strategy includes a commitment to publish proposals for a common cross-tenure housing standard beyond the existing tolerable standard for housing. The Scottish Government has now put forward a proposal suggesting the establishment of a virtual forum to consider this issue which could be used to develop a public consultation on a common standard.

ExHAS agrees that the Scottish Government should put in place a single mandatory condition standard (beyond the tolerable standard) for all properties irrespective of tenure. Given that the current tolerable standard was set eight years ago, it is appropriate to review this standard in light of current priorities and knowledge regarding housing standards, fuel poverty and climate change.

In our response to the Sustainable Housing Strategy consultation, ExHAS expressed the following views on the condition standard:

“The Alliance believes that a mandatory condition standard should co-exist alongside an energy performance standard (much as the SHQS exists alongside the tolerable standard today). It is our view that an absolute minimum condition standard should apply immediately to all properties, while the minimum energy efficiency standard would apply at point of sale or rental, gradually upgrading properties. This is similar to the SHQS which is to be met by 2015 (and the proposed standard by 2020) while the tolerable standard applies now. Thus, the minimum condition standard is not a replacement for minimum energy performance standards, but works alongside and supports them.”

We believe the current tolerable standard is inadequate in terms of energy performance – it merely requires ‘satisfactory thermal insulation’ with the key indicator being roof insulation with no comment on its quality or depth. The standard for insulation was set in 2006 and now is a good time to consider if such a basic standard is sufficient for making Scotland's homes ‘fit for the 21st century.’

Given current policy priorities around fuel poverty and climate change and the many incentives for insulation, the Alliance suggests that ‘satisfactory thermal insulation’ needs to be defined more closely such that the insulation genuinely does provide satisfactory performance. The SHCS 2010 Key Findings report estimated that 3.9% of housing failed to meet the tolerable standard. Over 80% of the failings are

in the private sector, demonstrating the success of the SHQS in driving up standards. It is also interesting to note that in the past, the tolerable standard has been used as a catalyst for area regeneration, because local authorities have been able to take action by declaring Housing Action Areas where a majority of houses in an area fail to meet the tolerable standard.

In terms of enforcement, we believe local authorities are best placed to undertake this role. However, there is no doubt that they are under-resourced to deliver on this responsibility. We recommend that local authorities are given sufficient resources to enforce a condition standard, and that the Scottish Government work in partnership with COSLA to ensure local authorities are making progress in this role. Together COSLA and the Scottish Government could establish a reasonable expectation for eliminating properties that are below the housing condition standard.”

Scottish Government proposal for a virtual forum

The ExHAS has the following comments to the questions posed in paragraph 11 of the proposal.

Should we proceed with this proposal for a virtual forum?

We agree with the proposal for a virtual forum to make the most effective and efficient use of participants' time. However, experience shows this will require significant 'secretariat' support to prompt participation. We recommend one or two additional face-to-face meetings (as a minimum half-way through to check on progress).

Would you prefer a more traditional series of meetings or other type or combination of formats?

See comments noted above.

Are there other key issues that should be included?

It is essential that this group's work is carefully aligned with the work of the Regulation of Energy Efficiency in the Private Sector (REEPS) working group. The Alliance is represented on REEPS and is concerned there could be confusion between the two standards and how they would work together. In our view, both are required: a basic standard that applies to all properties with immediate effect; and a minimum standard that applies at sale and rental to gradually drive up performance over time. Both are important parts of the effort to create social norms that value the energy performance of a property and consider poorly performing homes as substandard.

Do you have any concerns about using social media?

No, though all participants will have to be comfortable with, and have the equipment to participate. This can be a problem with skills or broadband access.

Do you have any concerns about the proposed structure?

As a starting point, the group will need to discuss and agree their remit so the work can remain focused on the task.

We believe the group's role in relation to developing the consultation should be made clear. We recommend that the group be given a remit to contribute to and comment on the consultation document.

We recommend the use of interim milestones to check progress over the course of the year.

The structure might allow for a smaller core group and a wider reference group to ensure adequate representation of interests, but also a workable number of participants in the regular meetings. There could be provision to co-opt special expertise as required on an ad hoc basis.

Do you have any concerns about the proposed process for considering papers?

See comments noted above.

Do you have any concerns about the proposed timetable for the forum?

It is important for this work to be related to the REEPS work on the consultation on regulation of the private sector.

Are you happy to make a commitment to be involved in the virtual forum process?

Yes, ExHAS would like to be represented on the forum.

Are there any key issues which you would be less interested in and want to have a lesser level of involvement?

All the issues are closely interconnected, though it is fair to say our main concern is achieving warm and low carbon homes in Scotland – helping to eradicate fuel poverty and reduce our climate emissions. The condition standard is an important tool in helping to achieve that goal and ridding Scotland of substandard homes that condemn people to live in fuel poverty.

Yours sincerely,

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For a more information on the Existing Homes Alliance Scotland see:
www.existinghomesalliancescotland.co.uk.