



## Existing Homes Alliance Scotland Briefing

### Scotland's Sustainable Housing Strategy Consultation

The Existing Homes Alliance Scotland (ExHAS) welcomes the consultation on Scotland's Sustainable Housing Strategy and its vision for “warm, high quality, affordable, low carbon homes and a housing sector that helps establish a successful low carbon economy across Scotland.” This briefing sets out the Alliance's early thinking on the consultation. It will form the basis of our full response to be developed over the summer and we welcome any views at this time.

#### Vision

We strongly endorse the objectives of the proposed strategy, namely to deliver a step-change in provision of energy efficient homes by 2030, meeting the fuel poverty target by 2016, contribute to climate change targets and realise associated green jobs in the building and refurbishment sectors.

We believe the strategy must have the right level of ambition to achieve this step-change. Therefore, **the objectives should be set in terms of highly energy efficient homes and the 'full contribution' to the Climate Change Act targets should be set at a 42% reduction in emissions rather than 36% as it now is.**

#### A National Retrofit Programme

We welcome the plans to establish a National Retrofit Programme (NRP) focusing on the existing housing stock. It is vital that any such programme provides a long-term, coherent programme, **not only bringing together existing efforts but delivering new methods to overcome barriers and deliver on fuel poverty and climate change targets. The NRP must also seek to maximise the impact on the market and help ensure we fully realise the potential to create and maintain jobs** and stimulate economic growth across Scotland.

This would be delivered partly through targeting support for the retrofitting of energy efficiency measures and micro-generation at low-income households and communities, thus helping deliver on both energy demand and fuel poverty targets. Additionally, owner occupiers and private sector landlords would be required to invest in energy efficiency improvements to bring homes up to agreed levels at certain trigger points. We believe it is important to consider the incentives, grants and regulations together in the NRP.

Milestones are important to measure progress towards these objectives and need to be set at such a level to ensure sufficient progress is being made. The milestones in the consultation are drawn from the current Report on Proposals and Policies and are expected to be met by 2022. **We believe the milestones in the draft strategy are not ambitious enough to meet its objectives. Consideration should be given to developing 5 year milestones for the duration of the NRP – so for example, 2015, 2020, 2025 and 2030 and the Alliance would welcome the opportunity to assist in drafting those along with other stakeholders.**

We endorse the principles of new fuel poverty and energy efficiency programmes as set out by the Fuel Poverty Forum: maximising energy company investment, local authority-led area-based schemes alongside national advice and support, focus on fuel poverty while also looking to address carbon emissions. Local authorities have a significant role to play in promoting the Green Deal and brokering additional funding to maximise uptake. **We do however recognise that delivery models may differ depending on the type of local authority. What is important is that the principles of an area-based approach set out in the interim report of the Fuel Poverty Forum are adhered to.**

## The Role of Standards

The Alliance believes that the success of the Scottish Housing Quality Standard (SHQS) in driving up standards in the social rented sector shows that a minimum energy performance standard can reduce levels of fuel poverty, emissions and transform cold, damp homes into warm, dry homes.

**We believe a minimum standard should be set for all private sector housing at agreed trigger points such as the point of sale and rental. The standard should be set at the Energy Performance Certificates (EPC) level of E by 2015 and raised to C by 2020.** Past experience shows that we cannot longer rely on voluntary incentives alone to deliver our fuel poverty and climate change targets. Minimum standards would act as a backstop and more importantly drive demand across the board for energy efficiency programmes and the Green Deal. **Minimum standards should be introduced alongside a package of financial incentives and grants, high-quality information and customer support, and a comprehensive skills strategy.** This ensures no homeowner or landlord would be burdened by unreasonable costs.

## Financial Market Transformation

We welcome the intention to stimulate a “culture shift” in how we value energy efficient homes. Wherever possible, incentives should reward those who invest in energy efficient homes – for example through the council tax and in the future, the new land transaction tax. Giving greater meaning to EPCs through minimum standards and a requirement for estate agents to post the EPC ratings prominently with sales particulars will help. We commend efforts to work with the property profession to ensure energy efficiency and renewables are properly assessed in property valuations.

## New Build Market Transformation

We welcome the intention to continue on the route-map towards net-zero carbon new build standards by 2016/2017 as set out in the Sullivan Report. It would be short-sighted to backtrack on those recommendations now, and create more homes for the future which will need to be upgraded.

## Skills and Training

The National Retrofit Programme has the potential to create and maintain thousands of jobs in the building and refurbishment industry. **We have concerns that much needs to be done to ensure these jobs are local jobs. There also needs to be considerable investment in skills and training to ensure the Green Deal and other programmes are delivered professionally, with high customer satisfaction.**

## Summary

The Alliance believes the draft strategy provides a sound framework for addressing the challenge of Scotland's existing housing stock. Scotland's housing is notorious for being cold, damp and unhealthy – it accounts for one quarter of Scotland's carbon emissions, while at the same time over one third of households are suffering from fuel poverty.

We encourage all interested parties to respond to this consultation to ensure the policies and programmes proposed will actually deliver the Strategy's vision. The Alliance will meet with stakeholders over the summer and host a consultation event on **Monday, September 3<sup>rd</sup>**, to discuss the Strategy with fuel poverty and domestic energy efficiency expert Dr Brenda Boardman, Scottish Government spokespeople and expert-led workshops on the National Retrofit Programme, the role of standards, finance, and skills and training. Spaces will be limited for this event. For more information and to register please go to : <http://www.existinghomesalliancescotland.co.uk/uploaded/files/SHSG%20event.pdf>

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