

QUESTION	RESPONSE
<p>1) Do you have any comments on this new definition of fuel poverty, in particular, what do you think about the proposal to use AHC and MIS as means to measure fuel poverty in Scotland? a) What, if any, challenges do you think this approach could present in enabling targeting of resources to those most vulnerable to fuel poverty</p>	<p>The new definition is difficult to convey to householders and it will be difficult to provide an “on the doorstep” test of fuel poverty.</p> <p>“After housing costs” (AHC) isn’t clear whether the maintenance/ repair of a property is covered – which should be factored in to ensure householders look after their property.</p> <p>Additionally the key issue with the definition is how to determine whether the spend of fuel is enough to attain a “healthy indoor environment” or whether it is heating to too high a level given the recommended heating regime. This poses a difficulty in attempting to calculate this (either on the doorstep or through a telephone call.</p> <p>In practical terms, it could be difficult to administer schemes against this definition as each householder would presumably require some form of survey - again difficult to explain why one person is getting it and another isn’t.</p> <p>The new definition does reduce cases whereby wealthy householders living in large properties would no longer be considered as fuel poor which is welcomed.</p> <p>There is no weighting for remote/rural/island areas which we would consider to be unfair given the already well documented issues these areas present. Therefore this merits further consideration in our view and should be accounted for.</p> <p>Clarity is required on what heating costs have been calculated on – and whether this takes into account local fuel data.</p> <p>The MIS (Minimum Income Standard) takes into account a family of 6 or less – and therefore there needs to be a clear indication of what constitutes being fuel poor for a larger family of over 6 and how this will be calculated.</p>

<p>b) If this definition is to be used, how would you propose these challenges are overcome?</p>	<p>There needs to be consideration given to very remote/remotely/island areas and potentially a rural weighting allocated to the definition</p> <p>Provide a measurement for housing maintenance and repair to ensure that this is accounted for.</p> <p>Ensure that local fuel use data is used for accuracy.</p> <p>Provide clarity on households with over 6 members.</p>
<p>2) Do you have any views on the proposal of using 75 years of age as a threshold for identifying those who are likely to be vulnerable to the adverse health outcomes of fuel poverty?</p>	<p>Pensionable age highlights a change in living circumstances; and therefore can also be used as a proxy for identifying fuel poor households. This change potentially highlights a different heating regime, potentially spending more “day time” hours in the property and therefore using more fuel to heat their home.</p> <p>Further information/clarity on the evidence to back up the “75” age bracket for vulnerability to fuel poverty would be welcomed.</p> <p>However, in general we would be happy to defer to expert medical judgement on this point.</p>
<p>3) In relation to island communities, are there any additional a. challenges that we need to consider in developing our strategy?</p>	<p>A further rural weighting may be advantageous for island areas; given the poorer health care provision on island areas; pre 1919 properties; and higher travelling costs (difficulties in securing & retaining sufficient staff to deliver effective services at a local level for instance)</p> <p>The lack of mains gas is a major challenge in many areas, meaning that householders are either on oil (volatile), mains electricity (expensive), or have to investigate innovative heating solutions with different projects (where there are difficulties with funding).</p> <p>Conservation area constraints mean that householders may have to accept solutions/measures that they may not want – e.g. intrusive internal wall insulation to a small property – and there needs to be a recognition for traditional energy efficiency</p>

	<p>measures for these areas (such as shutters and thick curtains).</p> <p>The logistics for island areas are one of the biggest challenges – with ferries; road closures and accommodation posing the main issues – meaning that there a lack of willing contractors for island communities.</p> <p>In terms of trades on the island, good trades are too busy as they have a good reputation; and unreliable ones are known on island and don't want to be used. Some are also not accredited for the insulation works.</p>
<p>3) In relation to island communities, are there any additional b. opportunities that we need to consider in developing our strategy?</p>	<p>Opportunities for having a “whole island approach” which would require a large scale community buy in In terms of Area Based Schemes, again a whole island approach should be sought for producing economies of scale which would address potential work commitments for contractors.</p> <p>Community involvement/lead for innovative energy efficiency schemes.</p>
<p>4) In relation to rural and remote rural communities, are there any additional a. challenges that we need to consider in developing our strategy?</p>	<p>Please see above.</p> <p>It is often the case that rural areas are potentially more hidden away and the challenges of very remote rural areas aren't as visible. Often these remoter communities exhibit similar characteristics to actual islands albeit technically they may be part of the mainland. Additionally, there is a challenge of defining the boundaries of the “community” in rural areas as there is a huge level of sparsity.</p>
<p>4) In relation to rural and remote rural communities, are there any additional b. opportunities that we need to consider in developing our strategy?</p>	<p>Off gas grid provides opportunities for innovative solutions to reducing energy consumption and alleviating fuel poverty</p> <p>Community led/involved emphasis towards generating interest and agreement for energy solutions. These areas may also be better placed in terms of coming together to support community led innovative projects.</p>
<p>5) Please give us your views on how national partners and local delivery organisations can work better together to identify and support those at risk of, or experiencing fuel poverty? What would best support, or enable such partnerships?</p>	<p>Argyll and Bute Council run an energy efficiency forum which invites energy agencies; charities; housing associations/registered social landlords and national agencies to discuss and share best practice regarding energy efficiency. The group meets quarterly and (as part of the</p>

	<p>Forum) are required to report on their energy efficiency activities every quarter. This provides a platform for agencies such as Home Energy Scotland and Argyll Lomonds and the Islands Energy Agency (ALenergy); local RSL groups and energy charities such as Islay Energy Trust and Iona Renewables Group to discuss what assistance they can offer and how best to interact with members of the public.</p> <p>In the past, the council has used bespoke house condition surveys to collate robust evidence base to inform needs assessments, development of local policy & strategy, and to bid for or generate investment opportunities.</p>
<p>6) What can local partners do to contribute to meeting national aims of effectively and sustainably tackling fuel poverty? This might include sharing best practice or developing strategic approaches.</p>	<p>Sharing best practice and resources (in terms of availability of grants; successful funding applications and opportunities for joint working) will assist with reducing fuel poverty.</p> <p>Given the unique housing stock, Argyll and Bute faces a difficult challenge of not being able to have a one size fits all approach. This would therefore need to be reflected in any funding opportunities or strategic approaches that are developed.</p>
<p>7) How can SG support local delivery partners (e.g. third sector organisations and social enterprises) to measure their success?</p>	<p>Provide a tailored energy efficiency/fuel poverty monitoring form for reporting purposes. This will allow for a uniform approach and will allow for something that's able to be replicated over Scotland.</p>
<p>8) How can the Scottish Government best support local or community level organisations to accurately a. measure provision of advice and support services and their outcomes?</p>	<p>Provide a tailored monitoring form and training on how to fill this out quickly on initial visit</p> <p>Have SG (or funder) write out to householder with a 6 month/year break to find out if advice is followed through.</p>
<p>8) How can the Scottish Government best support local or community level organisations to accurately b. report on provision of advice and support services and their outcomes?</p>	<p>A national system for reporting fuel poverty would be advantageous – it would allow a systematic approach for logging details and would ultimately ensure that there is a consistency for reporting.</p>
<p>8) How can the Scottish Government best support local or community level organisations to accurately c. ensure quality of provision of advice and support services and their outcomes?</p>	<p>An accredited quality training scheme would be advantageous for the delivery of energy advice and support. Again, this would provide a consistent approach to the delivery, reporting and measurement of fuel poverty advice and support; and would mean that householders are receiving a</p>

	broadly consistent fuel poverty approach.
<p>9) How can the one-stop-shop approach be enhanced for the benefit of HES clients; and in particular,</p> <p>a. Are there any improvements that you think can be made to the HES service to further enable it to best reach the most vulnerable to fuel poverty client groups?</p>	<p>A quicker identification of Able To Pay vs Fuel Poor.</p> <p>Have a streamlined conversation with client through HES and similarly better linkages with Warmer Homes Scotland /HEEPS: ABS contractors for accurate household information.</p> <p>Potentially better use of the Home Analytics dataset.</p>
<p>10) What are your views on our proposal to set a new statutory target to eradicate fuel poverty in the Warm Homes Bill?</p>	<p>Ambitious targets should be set, however with rising fuel prices and living costs, eradication of fuel poverty may be overly ambitious.</p> <p>The eradication of fuel poverty would have to include legislative powers that can be enforced.</p>
<p>11) What are your views on the proposed sub-targets?</p>	<p>The consultation paper identifies a statutory target of eradicating fuel poverty by 2040; and a non-statutory sub-target of reducing fuel poverty to below 10% by 2040. It needs to be clear as to what the statutory target for fuel poverty is – and whether the Government identifies “eradication” as being less than 10%. If this is the case, the statutory target should not be eradicating fuel poverty; it should be reducing it to below 10%.</p> <p>Consideration should be given to householders that don’t want insulation measures – which may have an impact on the 3rd target of insulating all properties. In areas where external wall insulation is a difficult and expensive measure (e.g. rural/islands) internal wall insulation is the preferred option. However, the intrusive nature puts householders off IWI; and therefore means that they will be missing out on insulation measures. Especially in conservation areas.</p> <p>There needs to be a further emphasis on reducing fuel costs (as this is one of the main drivers of fuel poverty and has a large influence on the issue). Although this is a UK Government issue and not devolved, consideration and lobbying for fairer energy prices must be considered.</p>

	<p>An independent review of delivery in 2030 would be welcomed to further identify the different needs that present themselves in the timeline.</p> <p>Further assessments should be required in order to identify if the sub-targets are achievable within the timescales identified.</p>
<p>11) What are your views on the proposed sub-targets? a) What are your views on the proposed levels?</p>	<p>Given that the “new” definition will reduce the number of fuel poor households to approx. 25%; a 10% target by 2040 should be achievable and realistic. However, this will still require significant investment into energy efficiency measures; as well as bespoke home visits to reduce energy consumption. An assessment should be conducted to identify the minimum investment required to meet these targets</p> <p>This still may not be reached unless energy costs become affordable across Scotland.</p>
<p>11) What are your views on the proposed sub-targets? b) What are your views on the proposed timeframe?</p>	<p>The timeframe provides a realistic opportunity to reduce levels of fuel poverty – and will be in line with Local Heat and Energy Efficiency Strategies to work alongside this target</p>
<p>12) What are your views on the proposed interim milestones?</p>	<p>The milestones are realistic if the revised fuel poverty definition reduces the overall fuel poverty levels by 5%.</p> <p>However, whilst the overall levels of fuel poverty may be reduced, hard to treat and hard to heat households (often found in rural areas) are still going to pose big issues and without a rural premium, areas that are already susceptible to fuel poverty will not change.</p> <p>Again, an assessment will be required in order to ascertain whether these milestones are realistic.</p>
<p>12) What are your views on the proposed interim milestones? a) What are your views on the proposed levels?</p>	<p>Please see above.</p>
<p>12) What are your views on the proposed interim milestones? b) What are your views on the proposed timeframe?</p>	<p>Please see above.</p>
<p>13) How should the new Fuel Poverty Advisory Panel and Fuel Poverty Partnership Forum monitor progress</p>	<p>Reporting requirement that is simple and easy to understand/use – with measures that can be applied across the country Reporting requirement for Local Authorities</p>

<p>towards meeting the proposed sub-targets and interim milestones?</p>	<p>to report on partnership working</p> <p>A review of the current proxies that are available for different fuel poverty schemes. Currently, households with benefits/are in Council Tax Band A-C receive grant assistance, alienating the working fuel poor in Council Tax Band D and above.</p> <p>There needs to be a greater use of modelled data as well as data from the EPC register (i.e Home Analytics) to have a greater understanding of fuel poverty instead of solely relying on SHCS (which is neither robust nor credible at the local level or for rural authorities such as Argyll & Bute.).</p>
<p>14) What do you think the Advisory Panel's priorities should be in its first year?</p>	<p>Create links with the NHS</p> <p>Identify what monitoring will be required for fuel poverty</p>
<p>15) What examples do you have of using proxies to identify fuel poor households? a) Which proxies did you use?</p>	<p>Council Tax Band A-C properties for HEEPS: ABS</p>
<p>15) What examples do you have of using proxies to identify fuel poor households? b) Based on your experience, how well did these proxies work in accurately identifying fuel poor households?</p>	<p>Council Tax Band A-C doesn't work for rural areas as fuel poverty is pepper potted. A better proxy would be off gas grid and island areas; and for more urban areas Council Tax Band A-C and off gas grid heating systems would identify fuel poor areas. Given fuel prices is one aspect that can't be tackled, it would make sense to target the more expensive options first.</p>
<p>16) What are the key lessons to be learnt from any existing approaches that apply proxies in door-to-door, on-the-ground assessments in this context?</p>	<p>An easy to use definition of fuel poverty and clear eligibility criteria to ensure that there is no grey areas for householders.</p>
<p>17) Do you have any concerns about the use of a doorstep tool, in particular the challenges around delivery of area based schemes?</p>	<p>Additional resources will be required in order to fully utilise a doorstep tool to identify eligibility for energy efficiency schemes.</p>
<p>18) How can the Scottish Government most effectively work with Community Planning Partnerships in a collaborative manner to report on overall fuel poverty levels as part of the SHCS?</p>	<p>A combination of the Home Analytics data along with data already collected in the Scottish Housing Condition Survey sample would ensure a collective approach and would utilise all available data. For example, Home Analytics data provides a fuel poverty figure of 41% for Argyll and Bute in 2016/17; as oppose to 48% from the SHCS.</p>

	<p>Identify what properties are being surveyed for the SHCS for Argyll and Bute.</p> <p>Ensure that the data collection side of SHCS is accurate and reliable at CPP/ Local Authority level.</p>
19) What are your views on, or experience of how an outcomes-focused approach would work in practice?	The approach is welcomed and needs to be accompanied by measures which directly relate to those outcomes as well as one measuring the drivers.
19) What are your views on, or experience of how an outcomes-focused approach would work in practice? a) Would it encourage national and local policy and delivery partners to work together effectively, and if not, what alternative approach(es) do you propose could be used instead?	Where it is possible to identify & quantify outcomes (as opposed to outputs), then this is the standard approach for delivering and measuring success of the general range of strategies and would normally encourage, facilitate and focus partnership working and joint delivery.
20) Do you think the principles detailed in the 3 bullet points above are adequately reflected in the outcomes framework?	Yes.
21) In your opinion, would the proposed framework help to strengthen partnerships on-the-ground? a) If so, how?	There needs to be a willing reason for partnership working (e.g. bringing funding into the area) which assists in strengthening partnerships between different agencies and local authorities. If the framework can reflect this then it will strengthen local partnership working.
21) In your opinion, would the proposed framework help to strengthen partnerships on-the-ground? b) If not, why?	Given that the proposed framework is set to be a statutory requirement that is measured and overseen by ministers, it will assist to strengthen partnerships on the ground due to it being recognised as a requirement.
22) Do you think any of the proposals set out in this consultation will have an impact, positive or negative, on equalities as set out above? If so, what impact do you think that will be and, if negative, how do you think these could be mitigated?	An EQIA is essential given that age is a critical factor in fuel poverty issues; and that this whole issue is now gaining traction and importance for Health & Social Care Partnerships – and promoting closer cross sectoral planning. Initial views are that the proposals will have positive impacts for particular groups and will provide improved equity across the population.
23) What implications (including potential costs) will there be for business and public sector delivery organisations from	If there is going to be a statutory requirement for fuel poverty eradication, then additional resources will be required in order to further facilitate work on the ground – whether this is delivered at a local

these proposals?	authority level or not.
24) Do you think any of these proposals will have an impact, positive or negative, on children's rights? If so, what impact do you think that will be and, if negative, how do you think these could be mitigated?	Yes, positive impact on children's health and wellbeing due to warmer, more efficient homes and generally better environments.