



13 February 2019

Stage 1 Report on the Fuel Poverty (Target, Definition and Strategy) Bill

Dear MSP,

I am writing to you following the publication of the Stage 1 Report on the Fuel Poverty (Target, Definition and Strategy) Bill by the Local Government and Communities Committee on 29th January 2019. I write this letter on behalf of COSLA in my role as spokesperson for Community Wellbeing. I write primarily to register our concerns with the recommendation for statutory targets to be placed upon individual local authorities.

We welcome and share the importance Scottish Government places upon reducing fuel poverty. Fuel poverty impacts people's lives in many ways and can result in discomfort, ill health and debt. Living in a cold, damp environment can exacerbate health problems and people struggling to pay their bills are often forced to self-ration their use of energy. Local authorities across Scotland will continue to make substantial contributions to mitigate fuel poverty and tackle inequalities in what will be a significant undertaking in the years to come.

We support the commitment to reduce fuel poverty to no more than 5 per cent of Scottish households by 2040. National and local leadership will be necessary to meet the proposed fuel poverty targets. I met with the Minister for Local Government, Housing and Planning in July 2018 and voiced our support for the renewed focus on tackling fuel poverty, including the new definition, and the interim and long-term targets.

Local Government recognise that having a statutory goal with a clear reporting structure sends a clear and consistent message across Scotland around the importance placed on tackling inequalities experienced by those living in fuel poverty. In the Stage 1 Report the committee recommend that Scottish Government consider amending Section 1 of the Bill to extend the national target to individual councils. We understand the intention of this recommendation is to eliminate regional disparities, however a blanket target does not acknowledge the regional disparities which already exist.

A nationally imposed target across local authority areas is an inflexible approach which does not recognise the local challenges unique to each area. For example, poverty levels, housing stock, supply chains, and broader market issues. Furthermore, it neither acknowledges the cost disparities that each authority may face in delivering against this target or commits to reconcile these with appropriate funding.

To ensure deliverability, any target placed on local authorities should be determined in consultation with individual councils and must be set alongside a commitment to the resourcing required. Partnership working between Scottish Government, local authorities and other stakeholders – especially across rural and island regions – will be required to determine the outcomes and resources required for each council to reach the proposed <5% target.

There is a risk that in applying the national target to individual local authorities the accountability for meeting the overall fuel poverty target will shift to Local Government who have negligible control over budgets and additional fuel poverty drivers such as income and fuel costs. New national policy and targets must be fully funded and not place additional pressures on already strained Local Government budgets. The responsibility for this sits with the Scottish Government.

We further note that the committee recommends increasing the frequency of statutory reporting from a five year to a three-year basis. This will place additional requirements on Local Government, which if not fully funded, has the potential to take resources away from front line delivery. In the context of restrained budgets, a balance needs to be struck between reporting and delivery. There needs to be clarity over the time/cost outlay of reporting requirements before any move to increase their frequency.

Similarly, whilst we acknowledge the important role of the Scottish Fuel Poverty Advisory Panel, we question the need to make this a statutory body. The membership of this group is voluntary and it is likely that significant investment would be required to turn this in to a statutory independent scrutiny body with the capacity and analytical capability to scrutinise and measure progress against the fuel poverty targets.

Within the reality of budget and resource constraints the creation of a new scrutiny body would risk diverting limited funding away from the core objective of supporting households out of fuel poverty. While we welcome advice on progress being made, such a body could cloud and confuse the separate and combined roles Scottish Parliament and Local Government have as part of representative democracy here.

Having registered our concerns with the impact that a small number of the recommendations made in the report will have on Local Government, I would like to take this opportunity to commend the Local Government and Communities committee on your dedicated work around scrutiny of the Fuel Poverty Bill.

Yours sincerely,

Cllr. Elena Whitham
COSLA Spokesperson
Community Wellbeing