



14<sup>th</sup> June 2002

Tony Cain  
Secretary  
Housing Improvement Task Force  
Housing Division 2  
Victoria Quay  
Edinburgh  
EH6 6QQ

Dear Tony Cain,

## **Response to Housing Improvement Task Force – Issues in Improving Quality in Private Houses**

energywatch Scotland welcomes this opportunity to comment on the Housing Improvement Task Force – Issues Paper. energywatch broadly welcomes the findings of the Task Force and looks forward to inputting into its future work.

As the statutory body responsible for representing the interests of gas and electricity consumers, and with a particular regard for low-income and 'vulnerable' consumers, energywatch considers the quality of the housing stock to be central to the development of an effective Scottish Executive Fuel Poverty Statement. The energy efficiency of the stock not only impacts upon fuel bills and the health of occupants but also on the Scottish Executive's ability to deliver a sustainable energy policy. The issues paper should therefore consider energy efficiency as central as it will have a major impact upon the Executive's ability to deliver its responsibilities under Fuel Poverty Statement, the Energy Policy Review and the Kyoto Protocols.

Moreover, when announcing this group the Minister stated:

*"The Executive's aim is to ensure everyone in Scotland has a warm dry home – whether in the public or private sector."* SE0637/2001

We are, therefore, concerned that sub group B's findings on the home buying and selling process have somewhat downgraded the issue of energy efficiency. Much of the focus has been on the quality, efficiency and cost of the home buying and selling system in Scotland as opposed to how the system itself impacts upon the quality of the stock. We are disappointed to find reference to energy efficiency within this section being mainly relegated to 'other information'.

**We recommend that the central issue should be how the current home buying and selling system impacts upon quality, and in particular on energy efficiency levels.**

Little mention of the proposals for a sellers' pack exists in the report. Although we understand the difficulties involved in delivering such, and have no wish to revisit the arguments here, we firmly believe these to be surmountable. However, it is clear this is an issue as it impacts upon information available to prospective buyers – the potential for multiple surveys in the current system makes prospective buyers more likely to commission Scheme 1 surveys only.

**It is recognised that the current system may operate to actively discourage the commissioning of more extensive surveys and therefore, the incidence of multiple surveys is a central issue which needs tackling.**

The report notes that there is a lack of information currently available on energy efficiency and also that there is currently little demand for it. We would agree with this, but both the availability of, and demand for, such information are central issues.

**We believe that the lack of information provided regarding energy efficiency during the home buying and selling process is a central issue and should be treated as such. We would also recommend that the lack of demand for such information be treated as an issue in itself which urgently needs addressing.**

The report notes that current grant schemes are insufficient to make a substantial difference to the stock. We would suggest that awareness of current grants available is also an issue.

**There are many grants available for energy efficiency but no mechanism for highlighting these at change of ownership where, for the buyer, there is the greatest likelihood of investment. Again the home buying and selling system could be used to deliver such.**

We also wish to highlight the European Union's *Draft Directive on the energy performance of buildings (COM(2001)226 final 2001*. This is set to require energy labelling of all buildings, consideration should therefore be given to how the operation of the home buying and selling system can help deliver this requirement.

**We recommend that the Task Force treats energy labelling as an issue worthy of consideration and looks to develop methods within the home buying and selling process which can help deliver this.**

To conclude, we would suggest sub group B gives higher priority to how the current system impacts upon housing quality; energy awareness; and how it can assist the Scottish Executive deliver on its responsibilities flowing from the Housing (Scotland) Act 2001 s.88, the development of a sustainable Energy Policy and the requirements of the Kyoto Protocols.

We hope these comments are of use.

Yours sincerely

Audrey Gallacher  
Director

energywatch Scotland  
1<sup>th</sup> Floor  
Delta House  
West Nile St  
Glasgow  
G1 2NP

