



Your details

Please complete the following details below. It is essential that we have a name and the name of any organisation if you are responding on their behalf. Contact details would be helpful if we need to follow up on any points.

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Would you like us to keep your response confidential:	No	

Consultation questions

Below you will find response boxes for each of our consultation questions. If possible, please base your response on answers to these questions.

Some questions may be somewhat irrelevant to your interests, in which case please feel free to answer as many or as few as you like. And please feel free to offer other comments if you think they are relevant to our remit. There is space at the end for you to do so.

You can skip to the section(s) that you wish to respond to through the links below:

1. [Wellbeing](#)
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Section 1: Our assessment of the importance of housing for wellbeing in Scotland

Q.1. Has our assessment of housing and wellbeing missed any important benefits and, if so, which benefits and what is the evidence for this?

There needs to be specific recognition of fuel poverty and domestic energy use as an indicator of wellbeing. Both our own research using a detailed dataset compiled from the records of a local authority (paper awaiting review) and DECC's more cursory data show there is a strong correlation between income and fuel spend, and that, regardless of fuel type, tenure, house type and other variables reported to influence fuel spend, rural households spend significantly more on energy. The wellbeing of such households, for example the >80% of fuel poor pensioner households in the Western Isles, may be particularly precarious for other reasons related to fuel poverty more widely (lack of access to support services etc). Therefore there needs to be an upfront acknowledgement of "affordable warmth" for all and how it can be achieved, as is evidenced (for example) by Denmark where energy prices are higher than for the UK but fuel poverty is near zero.

Q.2. Has our assessment exaggerated any of the benefits of housing for wellbeing and, if so, in what respects and what are your reasons for saying this?

No

Section 2: Does Scotland invest enough in housing?

Q.3. Do you agree with our assessment of the current position on investment in housing?

The position should recognise the need to develop infrastructure along with housing, and this should include consideration of the value of local energy networks. Significantly developing and expanding distributed generation and local electricity and heat networks (e.g. district heating schemes) will be critical to building resilience to both climate change and energy price rises. All new homes should be built either connected to a DHS or with 'DHS-ready' infrastructure installed, unless of course energy demand will be met (and ideally exceeded) by renewables. A Heat Planning Law would be a critical step in enabling this. A full referenced version of this evidence is included in our 'Housing Futures' report at: <http://www.scotland.gov.uk/Resource/0038/00389071.pdf>



Q.4. Do you agree with our brief assessment of current policy on investment in housing?

Yes.

Q.5. Do you agree with our suggestions for further action in the area of investment in housing?

Yes, plus also comments in Q3.

6. Do you have any other suggestions that we have not mentioned in relation to investment in housing?

Heating (and in the medium to long term, cooling) needs much more attention, particularly with respect to rural and island homes. In order to meet Scotland's climate change targets the Scottish Government's intention is to shift all heating to **renewable** electric or CHP DHS systems (biomass where possible, however the sustainability of the fuel supply needed at the envisaged scale is highly questionable). In many ways this is a positive move, given that gas prices are expected to rise significantly and become increasingly volatile over the next few decades. However the efficiencies of electric heating may bring fuel poverty targets into direct conflict with climate change targets (basic issue of capacity). And there are also potentially significant risks to building fabric associated with moving older / traditional properties over to electric heating - so far only one study by Historic Scotland has looked at this, which concluded that more research is needed.



Section 3: Getting a better fit between housing and the economy

Q.7. Do you agree with our assessment of the current position regarding housing and the economy? What more would you add?

'Help to Buy' is a subsidy to the banking industry based on the neoliberal Thatcherite policy of pushing individual homeownership. It undermines support that could, and should, be managed by local authorities and risks pushing low income households into penury and perpetual subservience to the banking industry. If we are to address health and wellbeing in Scotland we must address the undue influence the banking sector holds over the economy, and the power of major developers to effectively hold the Scottish Government and local authorities to ransom over the impact on profits of marginal costs for measures to improve wellbeing and sustainability (for example as happened around the Edinburgh Harbour development).

Q.8. Do you agree with our assessment of the current situation of UK Government policy with regards to the housing market and the economy?

The Scottish Governments' efforts to increase house building and the provision of affordable housing should be acknowledged as an admirable effort within tight constraints but more needs to be done. The political theories prevalent in all Westminster parties, and their influence on Scottish housing policy must be challenged.

Q.9. What are your views about the five areas of policy reforms suggested here?

Generally agree. We were consultees to the RICS Scotland Scottish Housing Commission report and generally endorse its findings, with the exception that we are concerned about the perceived need to develop new housing (and new towns) on 'green' land when much more could be done to reclaim disused buildings and brownfield sites.

Section 4: Getting a better fit between housing and welfare policy

Q.10. Do you agree with our assessment of the current position regarding housing and welfare benefits? What more would you add?

Generally agree – particularly as regards the concerns over direct payment of HB to landlords. This represents both a lack of sufficient welfare support services (as constrained by central government) and a missed opportunity to engage, educate and support vulnerable and hard to reach households to enable them to live more independently. And when mistakes are made, which they inevitably will, it disempowers poorer households from challenging the ‘system’.

Q.11. Do you agree with our assessment of the current situation of government policy at UK levels and the possible outcomes post-referendum? What more would you add?

We would support and encourage the devolution of all welfare responsibilities and control of all economic levers to address the level of welfare dependency. We also endorse the RICS Scotland report finding that housing (and housing benefit) should be elevated to a ministerial responsibility.

Q.12. What are your views about the medium term policy options presented here? What other ideas and issues strike you over this time frame?

Strongly support these.



Q.13. Do you agree that we have a unique opportunity to consider longer term policy options over the next key period in Scotland's history? How do you respond to the options proposed here? Are there other options that should be considered?

Agree, however the timescale should be accelerated. The importance of campaigning for a Citizens Income should not be under-estimated and would set Scotland apart from and ahead of the rest of the UK.

Section 5: Getting a better fit between housing and the environment

Q.14. Do you agree with our assessment of the importance of housing to the environment?

Housing energy efficiency standards should proceed at the rate set out by the original Sullivan Report. Unfortunately the Scottish Government (and the subsequent reviews of the Sullivan Report) seems to have accepted the claims of the housing industry that these original targets were set too high for an industry recovering from the recession. Our research has found no clear evidence that this is any more than conservative thinking from a (generally) ideologically, economically and technically conservative industry.

The assessment needs to consider housing improvements more widely – energy use, potential for community energy ownership, energy storage within housing infrastructure, etc – rather than focusing on insulation and other standard interventions.

Q.15. Do you agree with our brief assessment of current policy on housing in relation to the environment?

The proposal to move ECO funding from bills to general taxation should be encouraged but may not be deliverable in the current UK structure. If the proportion of ECO attributable to Scottish homes' energy use is transferred to the Scottish Government it would eliminate a lot of the cost burdens of the scheme (administration, etc) and at the same time provide the level of funding which would enable Scotland to invest in major infrastructure projects rather than current focusing on individual homes. However this does not eliminate the need for individual solid wall insulation solutions which are deliverable through HEEPS:ABS.



Q.16. Do you agree with our suggestions for further action in the area of housing and the environment?

In general, yes.

Q.17. Do you have other suggestions that we have not mentioned in relation to housing and the environment?

Not at this stage.

Section 6: Housing and Health and Education

Q.18. Do you agree with our on our assessment of the importance of housing to health and education?

Yes.



Q.19. Do you agree with our brief assessment of current policy on housing and health and education?

Yes. Some examples of these problems were highlighted as part of the Environmental Determinants of Physical Health in Scotland (EDPHiS) Project, in which GCU was a partner. (Paper: Teedon, P.L., Gillespie, M., Lindsay, K., & Baker, K.J., 2014. Parental perceptions of the impacts the built environment has on young children's health: a qualitative examination and lay assessment amongst residents in four Scottish communities. *Health and Place*, 28 (2014), pp. 50-57.)

Q.20. Do you agree with our suggestions for further action in the area of housing and health and education?

Yes, however the need for maintenance could be more strongly emphasised and prioritised here. Over half of Scottish homes are in need of repair (SHCS figures) but whilst much education focuses on energy efficiency measures the Scottish Government seems yet to grasp the more fundamental need to bring all housing up to a good standard *before* (or as part of) installing new measures.

Q.21. Do you have other suggestions which we have not mentioned in relation to housing and health and education?

Not at this stage.

Section 7: Housing and Community Regeneration

Q.22. Do you agree with our on our assessment of the importance of community regeneration?

Yes in principle. However we would highlight the fact that there is a poor correlation between FP and SIMD, and that our dependency on weak proxies leads to a focus on urban areas. This is commendable but we must acknowledge and look to address the living conditions of the many households in rural areas where FP is more prevalent.

Q.23. Do you agree with our brief assessment of current policy on community regeneration?

Yes, however the provisions of the Community Empowerment Bill need to be extended further to enable greater community ownership of both energy generation and energy infrastructure. Ownership of generation and distribution could contribute significantly to greater community empowerment, especially where local authorities take on the role of 'honest brokers' between communities, energy suppliers, and organisations such as the EST (e.g. as shown by the relatively greater success of CESP in Wales).

Q.24. Do you agree with our suggestions for further action in the area of community regeneration?

As 22, there needs to be greater efforts made into improving the living conditions of our rural poor.



Q.25. Do you have other suggestions which we have not mentioned in relation to community regeneration?

None other than to stress that community led, owned and operated energy solutions can play an important role in addressing regeneration issues, improving social capital and community cohesion.

Section 8: Do we need a more robust private rented sector?

Q.26. Do you agree with our views on the need for a more effective private rented sector which can make a greater contribution to meeting housing needs?

Absolutely, and we are aware of Shelter's excellent work in this area. The poor energy performance of the PDS is a critical issue for housing but one which the Scottish Government has seemed rather reticent to grasp.

Q.27. Do you agree with our brief assessment of current policy on the private rented sector?

Yes.



Q.28. Do you agree with our suggestions for further action in the private rented sector?

In general, yes.

Q.29. Do you have other suggestions which we have not mentioned in relation to the private rented sector?

As regards energy efficiency improvements, there is no reason why the PDS shouldn't fall under the same system as other sectors. A world-leading example of how this can be achieved is California's Residential Energy Conservation Ordinance (RECO). Interestingly, the early proposals for the Green Deal appear to have been cognisant of RECO, however the Westminster government stopped far (far) short of giving it the regulatory teeth that were essential for RECO's success.

Do you have any further comments in relation to the Commission on Housing and Wellbeing's consultation paper?

We have concerns over use of the terms "housing haves" and "housing have-nots" This is wholly founded on the neoliberal theme of property ownership as a measure of worth of individuals to society. The rented sector should not be devalued, nor its tenants who by circumstance or choice do not own the homes they live in. The UK economy is primarily fuelled by an endless succession of property bubbles and it could help stabilise the economy if that cycle was broken. The dependency of the banking sector and therefore economy on these cycles means that new build housing is not afforded its true worth to society and is also unattainable for such a large portion of the population due to over-inflated property prices. Using these terms merely buys into unaffordable housing.