

Bath & North East Somerset Council ECO Flexible Eligibility Statement of Intent July 2019 Update

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1 Introduction

1.1 Fuel poverty can cause low income and vulnerable households to live in cold, unhealthy homes and push them further into debt. Bath & North East Somerset Council welcomes the new local authority Flexible Eligibility powers for Energy Company Obligation (ECO) Affordable Warmth grant as a means to help address this issue. These powers will allow the Council to provide affordable warmth assistance to fuel poor households, that are not eligible under the existing criteria, and to low income households that are vulnerable to the effects of cold. Further details about Flexible Eligibility are set out in the Government's '[Energy Company Obligation \(ECO\): Help to Heat](#)' consultation response document.

1.2 In Bath & NE Somerset 7% of households in the district live in fuel poverty which equates to 6,114 homes¹. Based on the Low Income High Costs definition, there are areas of higher concentrations in the urban areas within the owner occupied stock with the highest concentrations overall in Twerton, Radstock and Oldfield. For the private rented stock, wards with the highest concentrations overall are Bathavon West, Twerton and Clutton.

1.3 The Joint Strategic Needs Assessment identifies cold homes as a particular problem for older persons and vulnerable persons. Excess Winter Death rates are a key indicator of the impact of cold weather on health. In Britain there are approximately 20% more deaths in winter than summer; but in other, much colder, countries the excess is smaller indicating that the impact could be reduced. In Bath & NE Somerset, there were 286 excess winter deaths between August 2012 to July 2015, a value of 18.9 on the excess winter deaths index (all persons). This is slightly lower than the regional and national figures (19.9 and 19.6 respectively) however due to small numbers, there is no statistical difference.²

¹ Integrated Dwelling Level Housing Stock Modelling and Database for Bath and North East Somerset Council BRE 2017

² Bath & North East Somerset Council (2017) Joint Strategic Needs Assessment – Excess Winter Deaths <http://www.bathnes.gov.uk/services/your-council-and-democracy/local-research-and-statistics/wiki/excess-winter-deaths> (Accessed 10/02/17)

1.4 ECO Flexible Eligibility will contribute towards the aims of the Council's Corporate Strategy, Health and Wellbeing Strategy, Environmental Sustainability & Climate Strategy and Economic Strategy. This includes:

- increasing the numbers of energy efficient, safe, healthy and affordable homes to live in
- enabling financial assistance to vulnerable and low income owner occupiers
- reducing carbon emissions from the domestic sector
- strengthening the local economy.

1.5 Nearly five years ago the Council set up its 'Energy at Home Scheme' to help deliver energy saving advice and efficiency measures to local residents. The current Council Climate Emergency priority means that the scheme is more important than ever as part of an overarching vision to maximise the benefits of a smart energy future, including improving the energy efficiency of the existing housing stock, delivering a greater local renewable energy production, and a strong focus on addressing fuel poverty. The Council currently works with a partner to deliver an Energy at Home Advice Service.

1.6 The Council will provide advice on energy saving options through the Freephone Energy at Home Advice Service. The eligibility of each resident calling the Advice Service will be assessed against the local Flexible Eligibility criteria.

2. Eligible households

2.1 ECO Flexible eligibility is available to private sector households, including owner occupiers and private tenants, in line with the Government's guidance (ECO: Help to Heat Flexible Eligibility p1).

2.2 All potentially eligible households will need to obtain and complete an ECO Grant Self Declaration Form from the Energy at Home Advice Service (Freephone 0800 038 5680 or see www.energyathome.org.uk). The Advice Service will also check eligibility in their initial conversation with the resident. The householder should then give the completed form to their chosen contractor.

2.3 The Council will issue Declarations for eligible customers to contractors offering ECO Flex Grant. Inclusion in the Declaration does not guarantee funding (see paragraph 2.10)

2.4 The Council will identify eligible households* in fuel poverty as those that:

- i) have an income of £30,000 or less AND less than £30,000 in savings of any kind;
and

ii) score 35 or above in their responses to the following high cost questions:

Question	Response	Score
Does the home use a boiler?	Yes	0
	No	5
Was the home built before 1964?	Yes	25
	No	0
What is the main fuel type?	Gas	0
	Electricity	30
	Other	20

iii) exceptional cases, not meeting the requirements above, will be considered on a case by case basis.

*Eligibility does not guarantee funding (see paragraph 2.10)

2.5 The Council will identify eligible households* on low income and vulnerable to the effects of cold, as those that:

- i) have an income of £30,000 or less AND less than £30,000 in savings of any kind; and
- ii) have one or more members:
 - with a limiting long term or terminal illness
 - with a disability
 - who are 60 years or over
 - who are dependent children of 18 years or under³

iii) exceptional cases, not meeting the requirements above, will be considered on a case by case basis.

*Eligibility does not guarantee funding (see paragraph 2.10).

2.6 The Council intends to support regeneration projects across the district where solid wall insulation is technically feasible, permitted under Planning legislation and can attract funding. The Flexible Eligibility powers also allow for homes, in these types of projects, that

³ These vulnerability definitions are in line with the Council's Decent Homes Policy.

are not in fuel poverty or vulnerable to be funded. This means that the aesthetic benefits of external solid wall insulation and the economies of scale from working in localised areas can be realised.

2.7 Non-fuel poor households eligible for solid wall insulation in-fill must be:

- in the same terrace as
- in an immediately adjacent building to, or
- are in the same building as a household that does meet the criteria

2.8 For each project, infill eligibility must meet the minimum percentages set out below:

Property Type	LA declaration requirements	In-fill available
Project consisting of a pair of semi-detached houses or bungalows, or a building containing no more than two domestic premises	At least one of the two-properties must be declared by the Council as fuel poor i.e. 50% of the properties must be fuel poor	The other property to which it is directly adjoined is eligible for solid wall insulation.
Project consisting of any premises that are contained in the same building (e.g. flats), immediately adjacent buildings (e.g. neighbouring detached properties) or in the same terrace	At least two in three properties on the list must be declared by the Council as fuel poor i.e. at least 66% of the properties are fuel poor	The other (i.e. up to one third) of properties in the project are eligible for solid wall insulation, provided they are either in the same building, an immediately adjacent building or in the same terrace as the ones identified as fuel poor

2.9 In particular, this may help households in the following areas, including but not limited to:

- the Foxhill & Mulberry Park Regeneration Scheme, both within and near the boundary
- Twerton West
- Whiteway, Twerton, Foxhill North and Whiteway West

The Council would also like to support the insulation of park homes, which usually have poor energy efficiency.

2.10 The final decision on whether any individual household can benefit from energy saving improvements under Affordable Warmth will be made by the obligated ECO

suppliers or their agents/contractors. Inclusion in a Declaration, issued by the Council to a supplier, will not guarantee installation of measures, as the final decision will depend on: i) survey carried out by suppliers agents/contractors and installation costs calculated; ii) the energy savings that can be achieved for a property; and iii) whether suppliers have achieved their targets or require further measures to meet their ECO targets.

3. Acting on behalf of another local authority

3.1 This is currently not applicable.

4. Governance

4.1 The Energy at Home Scheme is governed by the Energy Services Senior Advisory Group. This Group oversees Energy at Home and other energy services projects. It is comprised of senior Council staff, from Directorates such as Adult Care & Health Commissioning, Housing, Strategy & Performance and Finance, a Councillor and a representative from Curo, the local housing association. The Group's role is to:

- take an overview of all the projects in the context of wider strategic priorities
- when necessary, take strategic decisions on behalf of the Partnership, including those where the outcome may make a substantive change to the agreed objectives
- shape and support executive level decision-making
- understand and promote the way in which the project could involve joint working with local partners and neighbouring local authorities
- understand and promote any key messages
- escalate any issues as appropriate.

4.2 Officers from the Senior Advisory Group inform and update both the Environmental Sustainability Partnership and the Health & Well-Being Board about the Energy at Home Scheme.

4.3 The Senior Advisory Group is supported by a Project Team, comprised of staff from the Council's Community & Corporate Sustainability Team and the Housing Services & Improvement Team.

4.4 The Declaration of households who meet the Council's Flexible Eligibility criteria will be signed off by a Team Manager or a Senior Environmental Health Officer within the Housing Services Team. Email: Housing@bathnes.gov.uk

5. Referrals

5.1 Eligible households will be identified through the Energy at Home Advice Service from a phone call or following a referral from a frontline worker. The Energy at Home website allows frontline workers to make simple or more detailed referrals.

5.2 General marketing that has proved effective for Energy at Home includes:

- advertising or editorial in the Council's magazine to residents
- postcard mail outs addressed to the householder
- articles in local newsletters with a community following, such as parish council or privately run village or town newsletters
- emails to households who have previously contacted the Advice Service and asked to be kept informed of new offers
- local councillor supported messages on twitter or in newsletters
- scaffolding banners
- Delivery Partner leafleting to properties near those with installations being carried out
- leaflets to community venues
- tweets from @myEnergyatHome and @greenbathnes
- displays in empty shops owned by the Council
- stalls at libraries or community events

5.3 In order to identify those households that are vulnerable to the effects of cold, Housing Services will:

- work closely with Public Health to identify routes to vulnerable households such as flu vaccine marketing
- carry out briefings for frontline Council staff and other agencies to encourage referrals, including housing and environmental health staff, health and social care workers, WE Care & Repair, AgeUK and the Citizens' Advice Bureau
- work with other Council's and organisations when relevant opportunities arise.

6. Evidence, monitoring and reporting

6.1 The number of households eligible for ECO Flexible Eligibility will be recorded by the Advice Service in their monitoring report to the Project Team. This will be split into fuel poor homes and those on a low income and vulnerable to the effects of living in cold homes.

6.2 Details of ECO Flexible Declarations made by Housing Services will be recorded and reported.

6.3 Each eligible household will be asked to sign a self-declaration form when agreeing with the Delivery Partner to go ahead with works.

6.4 The Council will audit the process of at least 1 in 20 applicant households for evidence of eligibility at the time of approval and checking this as the application goes ahead. A high level of non-compliance will trigger a review of the Flexible Eligibility process.

7. Statement of Intent authorisation

Signed by:

Date: 26th July 2019

A handwritten signature in black ink that reads "Ashley Ayre". The signature is written in a cursive style with a large initial 'A'.

**Ashley Ayre
Chief Executive Officer
Bath & North East Somerset Council**