

Stafford Borough Council ECO: Help to Heat Flexible Eligibility Statement of Intent.

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Publication of this statement can be found at

[https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Housing/Flexible - Eligibility Statement of Intent.pdf](https://www.staffordbc.gov.uk/sites/default/files/cme/DocMan1/Housing/Flexible_Eligibility_Statement_of_Intent.pdf)

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Introduction

- 1.1. The Energy Company Obligation (ECO) is an obligation placed on energy suppliers by government, aimed at helping households cut their energy bills and reduce carbon emissions by installing energy saving measures.
- 1.2. The Affordable Warmth (AW) element of the ECO programme delivers heating and insulation measures to low income and vulnerable households in receipt of certain benefits.
- 1.3. Flexible eligibility allows local authorities to make declarations determining that certain households meet the eligibility criteria for a measure under the Affordable Warmth element of ECO in their area.
- 1.4. This Statement of Intent sets out how Stafford Borough Council proposes to use the Flexible Eligibility element of ECO to support and assist fuel poor households and those at risk from cold homes.
- 1.5. The Council's Corporate Business Plan 2018-2021 has a clear objective "To improve the quality of life of local people by providing a safe, clean, attractive place to live and work and encouraging people to be engaged in developing strong communities that promote health and wellbeing." Tackling the negative effects of fuel poverty and cold homes remains a key priority for the Council to protect vulnerable households.
- 1.6. Fuel Poverty is a significant issue in Stafford Borough, with 9.9% of the population (5,801 households) believed to be affected.
- 1.7. The issues are not uniform across the Borough; older (less efficient properties) and a lack of access to mains gas are a key driver of high fuel poverty rates in rural parts of the Borough, particularly areas surrounding Eccleshall and Gnosall whereas areas such as Holmcroft and Littleworth within the Stafford town area experience high levels of fuel poverty characterised by hard-to-treat, energy inefficient housing and lower incomes.

1.8. The Council believes Flexible Eligibility can play an important role in tackling fuel poverty and improving energy efficiency across the Borough. In particular, the Council is keen to use Flexible Eligibility to:

- 1.8.1. maximise the uptake of cavity wall and loft insulation measures;
- 1.8.2. maximise the uptake of measures for off-gas properties, including assistance to households with LPG, oil and solid fuel heating systems
- 1.8.3. assist residents with hard to manage and inefficient electric heating systems
- 1.8.4. assist residents with non-programmable heating systems
- 1.8.5. help develop schemes targeting insulation at hard-to-treat properties, particularly solid walled properties
- 1.8.6. develop other schemes as opportunities arise, including support for park home sites
- 1.8.7. provide a route for the use of Local Authority capital funding contributions where, from time to time, these might be eligible through the Council's Assistance Policy.

2. Eligibility

2.1. Affordable Warmth criteria¹:

In order to qualify for assistance under the Government's ECO programme residents must own (with or without a mortgage) their home or rent from a private landlord.

Some measures will also be allowed for tenants in the most inefficient social housing.

2.2. Flexible eligibility criteria:

Suppliers can achieve up to 25% of their Affordable Warmth target in households falling outside of the eligibility criteria described above who are defined as eligible by the local authority through this Statement of Intent.

There are specific categories of individuals expected to benefit by the scheme extension:

2.2.1. People living in fuel poverty, in particular those not in receipt of eligible benefits.

2.2.2. People living on a low income and vulnerable to the effects of living in a cold home.

¹ Detailed guidance on the financial eligibility for the Affordable Warmth (AW) element of the ECO programme can be found at: <http://www.legislation.gov.uk/ukxi/2018/1183/contents/made>

The final decision on whether a household receives an ECO measure is made by the energy suppliers or their agents/contractors. Eligibility will not guarantee installation of measures, as the final decision will depend on:

- a survey carried out by suppliers agents/contractors and installation costs calculated.
- the energy savings that can be achieved for a property, and
- whether suppliers have achieved their targets or require further measures to meet their ECO targets

3. Tenure:

ECO Flexible Eligibility is available to private sector households. In accordance with the national guidance on Affordable Warmth, the tenure of a property affects eligibility for certain measures.

- 3.1. Owner occupied households will qualify for any ECO measure² if a householder is designated as fuel poor (FP) or low income and vulnerable to the cold (LIVC)
- 3.2. Private rented premises are eligible where;
 - 3.2.1. The premises have an EPC rating between A and E, where the household is also deemed FP or LIVC, but the measure(s) required do not include the replacement or repair of a boiler, electric storage heater or central heating system that has broken down.
 - 3.2.2. The premises have an EPC rating of F or G or those without a valid EPC, where the household is deemed FP or LIVC and installation measure is only solid wall insulation and or a renewable heating measure.³

4. Fuel Poor and Low Income

- 4.1. **Householders qualify if they are found to be fuel poor (FP) or low income and vulnerable to the effects of living a cold home (LIVC).**

Fuel Poor (FP)

LOW
INCOME

+

EPC D, E, F G OR
HIGH COST OF
HEATING HOME

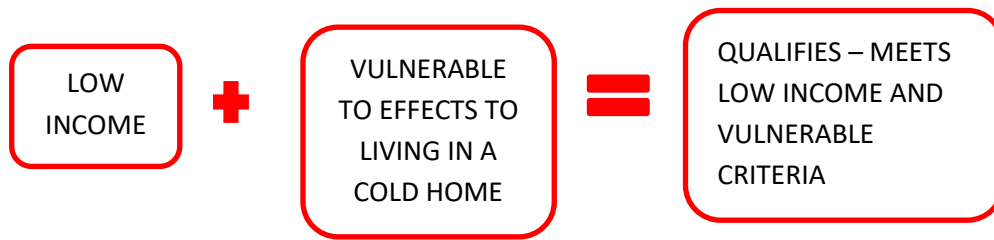
=

QUALIFIES – MEETS
BOTH LOW INCOME
AND HIGH COST
CRITERIA

² <https://www.ofgem.gov.uk/publications/eco3-measures-table>

³ Privately rented properties with an EPC rating of band F or G are not eligible under Flexible Eligibility except for solid wall insulation or renewable heating measures. Landlords are responsible for meeting these standards under the Minimum Energy Efficiency Standards regulations.

Low income and vulnerable to a cold home (LIVC)



4.1.1. Low income qualifying criteria

Households will qualify if they have a net annual household income of under £23,200 after housing costs (rent and/or mortgage). Household income is defined as income from all household members from all sources including net earnings (after tax), income from savings and investments, pensions, all benefits (including housing benefit) and net council tax payments. Housing costs are defined as rent or mortgage, including ground rent and any reasonable service charges (e.g. for flats). The latest Annual Fuel Poverty Statistics Report, 2020 from DECC states that the median (average) income after housing costs (AHC) i.e. once rent or mortgage are taken out, in 2018 was £23,212⁴ for the overall population. Therefore, the Council will identify households in fuel poverty as those that have an annual income after housing costs of **£23,200 or less**.

4.1.2. High cost household criteria

High costs will be assumed for any property with an EPC rating of E, F or G. High usage of fuel or high cost of the type of fuel being used, can be attributed to the overall energy efficiency of the home. High costs will be assumed where the main heating source is not gas central heating. For any other energy efficiency measure, high costs will be inferred by the eligibility for a heating or insulation measure as determined by OFGEM, in their list of approved measures.⁵

4.1.3. Low Income and Vulnerable (LIVC) qualifying criteria

Certain households are more vulnerable to the effects of living in a cold home. Households will qualify under the Flexible Eligibility criteria where they have **one occupant or more** who is vulnerable to the cold outlined in the **NICE guideline**⁶ NG6 “Excess winter deaths and illness and the health risks associated with cold homes” as shown below:

- People with cardiovascular conditions
- People with respiratory conditions (in particular, chronic obstructive pulmonary disease and childhood asthma)
- People with mental health conditions
- People with disabilities
- Older people (65 and older)

⁴<https://www.gov.uk/government/statistics/fuel-poverty-supplementary-tables-2020>

⁵ <https://www.ofgem.gov.uk/publications/eco3-measures-table>

⁶ <https://www.nice.org.uk/guidance/ng6/chapter/What-is-this-guideline-about>

- Households with young children (from new-born to school age)
- Pregnant women
- People who are terminally ill
- People with suppressed immune systems
- People who move in and out of homelessness
- People with addictions
- People who have attended hospital due to a fall
- Recent immigrants, asylum seekers and refugees (if living in private tenure)
- Households in debt

4.1.4. Discretion

Stafford Borough Council is aware of the additional strain placed on primary, secondary, and social care of cold related ill health, and wishes to undertake a pragmatic approach to supporting those whose health is at risk from a cold home, and those households most likely to require a health intervention at times of “winter pressures”. Therefore, it will permit a higher income threshold for those identified in NICE guidance NG6, as at risk groups, to take account of this risk.

This statement looks to support those with a diagnosis of ill health within the previous 6 months, who are susceptible to the cold, but who have not yet been assessed, or received a disability benefit.

4.1.5. Gas Mains Infrastructure

The Council has been working with communities to identify streets in Stafford Borough that they would like to extend the gas mains into. These streets have not had access to gas mains infrastructure before, and as such, the residents have significant barriers preventing them from upgrading their heating to a gas central heating system.

As a result, many of these residents still heat their homes with old, inefficient electric storage heaters or electric plug in panel heaters which are expensive to run, and the quality of heat is poor. Therefore, households on these streets are more likely to be living in fuel poverty than elsewhere. The following streets have been identified for infrastructure expansion.

- Meadowbrook Court ST15 8
- Riverside Mews ST16 2
- Fairfield Court ST16 3
- Longton Road ST12 9
- Doxey Road ST16 1
- Marston Drive ST16 3
- Peter James Court ST16 3

The Council will work with partners across Staffordshire Warmer Homes to identify the households on these streets that qualify for ECO support either through Affordable Warmth criteria or through the Council’s Flexible Eligibility criteria which is set out above.

4.2. Staffordshire Warmer Homes Scheme

Please note that all households applying for the Warm Home Fund for first time central heating will use an alternative application process. This is to ensure a consistent approach to the delivery of this project across Staffordshire.

4.3. Solid Wall “in-fill” project

To increase economies of scale, solid wall insulation projects which are not deemed ‘fuel poor’ will be deemed eligible for support where they are co-located with a minimum percentage of households deemed to be fuel poor (FP) or low income and vulnerable to the effects of living in a cold home (LIVC). See 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.

5. Acting on behalf of another Local Authority

This is not applicable.

6. Joint Statement of Intent

This is not applicable.

7. Governance

Stafford Borough Council reports progress towards its various energy and carbon reduction objectives through the Home Energy Conservation Act (HECA) reports.

The declaration of households who meet the Council’s agreed Flexible Eligibility criteria will be signed off by an appropriate senior officer.

The final decision on whether any individual household can benefit from energy saving improvements under Affordable Warmth and Flexible Eligibility will be made by the obligated suppliers or their agents/contractors.

8. Referrals and applications

All potentially eligible households will need to apply through Warmer Homes Stafford (WHS). WHS is a partnership between Stafford Borough Council and Beat the Cold (BTC). Householders can apply directly by contacting WHS, or can be referred for an assessment (Freephone 0800 677 1785). WHS advisors will check eligibility and householders will be asked to confirm they meet qualification criteria in writing and give permission for their data to be shared as needed with the council and contractors, in line with General Data Protection Regulations.

WHS facilitates a referral network of agencies such as charities, health care providers and community groups in order to make those who need the support most aware of the funding and how to apply.

Contractors can submit households they believe to be eligible for an assessment which will be undertaken by the WHS team. There is a secure referral process to enable this. All contractors must provide references from either the energy company providing their ECO funding, or another local authority.

WHS will pass a draft declaration listing the qualifying household to the council to be signed. Once this has been signed, it will be passed from WHS to an approved installer, who will arrange to carry out a household survey and works, as necessary.

9. Evidence, monitoring and reporting

Data will be collected on each potential applicant through the governance processes described above. The number of households who contact the energy advice line and are eligible for ECO Flexible Eligibility; the number of ECO Flexible Eligibility funded measures installed; and the number of homes receiving measures will be recorded and reported upon by the WHS service, as part of the contractually required quarterly Key Performance Indicators report to Stafford Borough Council.

WHS advisors will visually inspect evidence of eligibility prior to an application being made, where possible. The Council will audit the process by writing to 1 in 10 applicant households asking for evidence of eligibility at the time of the application. A high level of non-compliance will trigger a review of the Flexible Eligibility process.

10. Statement of Intent authorisation

Signed:

A handwritten signature in blue ink, appearing to read 'Annie', written in a cursive style.

15 September 2020

Name: Anna Nevin

Job Title: Health and Housing Manager

This document has been superseded