

# Energy Company Obligation: Help to Heat

## Local Authority Flexible Eligibility Statement of Intent

On behalf of the Cambridgeshire Energy Partnership which comprises of the following Cambridgeshire local authorities:

Cambridge City Council, East Cambridgeshire District Council, Fenland District Council, Huntingdonshire District Council and South Cambridgeshire District Council.

**Date of publication:** 20th December 2018

**Version:** 1

**URLs:**

**Cambridge City Council:** <https://www.cambridge.gov.uk/laflex>

**East Cambridgeshire District Council:**  
<https://www.eastcamb.gov.uk/energy-efficiency/energy-efficiency>

**Fenland District Council:** [www.fenland.gov.uk/energy](http://www.fenland.gov.uk/energy)

**Huntingdonshire District Council:** [www.huntingdonshire.gov.uk/cefsoi](http://www.huntingdonshire.gov.uk/cefsoi)

**South Cambridgeshire District Council:** <https://www.scamb.gov.uk/LAFlex>

### 1) Introduction

- 1.1. Fuel poverty in England is measured using the Low-Income High Costs (LIHC) indicator, which considers a household to be fuel poor if: they have required fuel costs that are above average (the national median level); and were they to spend that amount, they would be left with a residual income below the official poverty line.<sup>1</sup>
- 1.2. 2016 figures for England estimate that over 2.5 million households suffer from fuel poverty, 11.4% of the total.<sup>2</sup> Living in a cold home doubles the risk of respiratory problems in children; increases the risk of minor illnesses; exacerbates existing conditions such as arthritis and is associated with three times the level of excess winter deaths as the warmest homes.<sup>3</sup>
- 1.3. The Cambridgeshire Energy Partnership aims to increase the uptake of energy efficiency installations and reduce fuel poverty in Cambridgeshire. We welcome the introduction of Flexible Eligibility as part of the Energy Company Obligation (ECO) as it provides an opportunity for local authorities to utilise our skills, resources and knowledge to target households that are most in need, and to set eligibility criteria that recognise the circumstances and challenges of each individual council area.

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<sup>1</sup> BEIS, Annual Fuel Poverty Statistics Report 2017, (2017) p.3

<sup>2</sup> Ibid

<sup>3</sup> Marmot Review Team, The Health Impacts of Cold Homes and Fuel Poverty, (2011) p.9

- 1.4. Fuel Poverty affects over 24,000 households in Cambridgeshire<sup>4</sup> contributing to more than 700 Excess Winter Deaths on average each year.<sup>5</sup> Targeted activity by the Cambridgeshire authorities has seen a downward trend in the number of residents in fuel poverty since 2011, however current data shows there is still more work to be done.
- 1.5. Each Local Authority within Cambridgeshire will have specific areas of concern depending on the characteristics of their local area. Therefore our guidance must be broad enough to meet a range of priorities while maintaining focus on the fuel poor.
- 1.6. Action on Energy Cambridgeshire is the brand developed by the Cambridgeshire Energy Partnership to deliver tailored advice and support to residents. It was through this brand the Cambridgeshire authorities successfully delivered the Green Deal Communities scheme and has worked with local health professionals and charities to build a referral network to identify and support Cambridgeshire residents in need. Addressing fuel poverty remains a priority for the Cambridgeshire authorities and we expect Flexible Eligibility to complement our future activity.
- 1.7. We wish to make it clear that the final decision on whether any individual household can benefit from energy saving improvements rests with obligated energy suppliers or their contractors. Inclusion in a declaration issued by a Cambridgeshire local authority to a supplier will not guarantee installation of measures. The final decision will depend on:
- i. survey carried out by contractors and installation costs calculated;
  - ii. the energy savings that can be achieved for a property;
  - iii. whether suppliers have achieved their targets or require further measures to meet their ECO targets.

## 2) How we intend to identify eligible households

All of Cambridgeshire's Local Authorities will use the following eligibility criteria to identify households that may benefit from the installation of measures under 'Flexible Eligibility'. This criteria has been selected to recognise those residents on low income but still at risk of fuel poverty, yet not sufficiently low enough as to be eligible for benefits,

Eligible households will therefore be those on a low income, as defined below in the first eligibility criteria, and, in addition, meet any of the second defined vulnerability criteria.

### 2a) ECO Flexible criteria eligibility

Eligible private sector households will need to meet one of the **Low Income criteria (A)**

AND

either one from **High Costs (B)**      OR      one from **Vulnerable to Cold (C)**

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<sup>4</sup> <https://www.gov.uk/government/collections/fuel-poverty-sub-regional-statistics>

<sup>5</sup> <http://fingertipsreports.phe.org.uk/health-profiles/2017/e10000003.pdf>

### (A) Low Income:

- A resident must be in receipt of one of the following:
  - Income-based Jobseeker's Allowance (JSA)
  - Income-related Employment and Support Allowance (ESA)
  - Income Support (IS)
  - Pension Credit (PC – all types)
  - Universal Credit (UC – no income cap)
  - Child Tax Credit (CTC – no income cap)
  - Working Tax Credit (WTC – no income cap)
  - Housing Benefit (HB)
  - Council Tax Reduction (CTR - not where 25% single occupant reduction only applies)

Note: Where a resident is not in receipt of a means tested benefit the resident may still be eligible if there is a net annual household income of less than £20,000 for a single person, £30,000 for a couple and savings of less than £20,000.

### (B) High Cost:

- The property has an Energy Performance Certificate (EPC) rating of E, F or G dated with 10 years of the initial inspection

OR (where EPC does not exist)

- The property reaches a total score of 20 or above through the below methodology;

Question	Response	Score
How many bedrooms are there in the home?	1	0
	2	10
	3	18
	4	25
	5 or more	32
What type of property is it?	Semi-detached	0
	Detached	6
	Mid terrace	-5
	End terrace	-2
	Flat / Maisonette	-20
	Flat unheated space below	-5
When was your house built?	Before 1930	22
	1930 - 1964	14
	1965 - 1981	6
	1982 or later	0
Does the home have central heating? (i.e. radiators and a boiler)	Yes	-10
	No	10
How is your main heating system powered?	Mains gas	-5
	Electric	18
	Oil	8
	LPG (bulk/bottle gas)	10
	Solid Fuel	12

	Low carbon e.g. heat pump / biomass boiler	-20
What type of walls does your property primarily have?	Solid brick/stone	15
	Cavity wall (insulated)	0
	Cavity wall (not insulated)	4
	Other (e.g. system build, concrete block, cob, park home)	15

### **(C) Vulnerable to Cold:**

#### **Eligible if:**

- Receipt of Disability Living Allowance (DLA), Personal Independence Payment (PIP) or Attendance Allowance (AA)

OR

- Where a resident is vulnerable if:
  - Pregnant
  - Children aged under 5
  - Aged over 65

OR

- Has a health condition that can be exacerbated by the cold including:
  - Hospital admission due to a fall
  - Cardiovascular conditions (e.g. angina, stroke)
  - Respiratory conditions (e.g. COPD and asthma)
  - Musculoskeletal conditions (e.g. osteoarthritis, rheumatoid arthritis)
  - Neurological conditions (e.g. ME, fibromyalgia, dementia, multiple sclerosis)
  - Autoimmune and immunodeficiency diseases (e.g. lupus, MS, diabetes, HIV)
  - Mental health conditions (e.g. depression, schizophrenia, bipolar disorder)
  - Disabilities (e.g. impaired mobility)
  - Terminal illness
  - Learning disabilities (e.g. downs syndrome)
  - Cancer
  - Haemoglobinopathies (e.g. sickle cell disease, thalassaemia)

## **2b) Solid Wall Insulation (SWI) “in-fill”**

To increase the economies of scale of SWI projects, solid wall homes (i.e. brick or stone without a cavity) which are not ‘fuel poor’ can be classified as eligible for measures under the ECO Flexible funding where they are co-located with a minimum percentage of households assessed to be fuel poor (as per the above Low Income and High Cost (A+B), or Low Income and Vulnerable to Cold (A+C) criteria). The in-fill criteria will be:

- Semi-detached houses/bungalows and buildings with 2 premises – at least 50% of properties must meet the fuel poor criteria (A+B or A+C)
- Same terrace – at least 66% of properties in an SWI project must meet fuel poor criteria (A+B or A+C)
- Same building – at least 66% of properties in an SWI project must meet fuel poor criteria (A+B or A+C)
- Adjacent properties - at least 66% of properties in an SWI project must meet fuel poor criteria (A+B or A+C)

## **3) Acting on behalf of another Local Authority:**

In general practise it is the responsibility of the Local Authority where the applicant property resides to sign “Local Authority Declarations”.

However, when required, one of the Local Authorities may issue a declaration on behalf of another of the above named Local Authorities. In this case the declaration will include the name of the Local Authority upon which the decision is being made on behalf of.

## **4) Joint statement of intent**

The Councils named below have all agreed to the same criteria as defined above. Cambridge City Council is acting as lead behalf of the Local Authorities including:

- Cambridge City Council
- East Cambridgeshire District Council
- Fenland District Council
- Huntingdonshire District Council
- South Cambridgeshire District Council

## 5) Governance

The below named representatives will have authority to sign-off Local Authority declarations within their respective districts.

Local Authority	Authorised Signatory: Name / Position
Cambridge City Council	Justin Smith, Energy Projects Team Leader
East Cambridgeshire District Council	Elizabeth Knox, Environmental Services Manager
Fenland District Council	Isabel Edgington Senior Events and Projects Officer
Huntingdonshire District Council	Julian Leeming Energy and Sustainability Officer
South Cambridgeshire District Council	Siobhan Mellon Development Officer

## 6) Referrals

Each authority will receive referrals via established pathways, from health and social care sectors, the voluntary sector and other agencies, and including Local Authority officers, contractors and other frontline staff. The authorities will also utilise data and local knowledge to target support and promote funding to households most in need as well as carrying out general publicity throughout Cambridgeshire.

## 7) Evidence, Monitoring and Reporting

Each Cambridgeshire district authority will manage referrals in their area and will hold all required householder information including qualifying criteria evidence, e.g. benefits/EPC/health data where required, and the signed declarations.

We will monitor submissions for ECO Flex applications and liaise with contractors to ensure assistance is reaching our target groups. Where particular campaigns and engagement activity has taken place we will monitor related referrals and installations to evaluate the success of our activity, Where required we will refocus our engagement activity to suit.

Activity will be monitored on at least a quarterly basis through the Cambridgeshire Energy Partnership. This gives the opportunity for sharing of good practice and to monitoring both the effectiveness of delivery, but

also the referral approval process. The aim is to continually monitor our support to ensure we deliver an effective ECO flex solution, and ensure it meet the need of Cambridgeshire residents.

A sample of at least 5% of applications will be audited to help prevent and detect fraud. Where this takes place more detailed evidence will be required concerning the application.

Evidence will be retained for a maximum of 3 years as recommended by the Department of Business, Energy and Industrial Strategy.

## **8) Signatures**

Suzanne Hemingway, Strategic Director, Cambridge City Council

Jo Brooks, Director Operations, East Cambridgeshire District Council

Richard Cassidy, Corporate Director, Fenland District Council

Oliver Morley, Director, Huntingdonshire District Council

Beverly Agass, Chief Executive, South Cambridgeshire District Council