Local Authority Flexible Eligibility Statement of Intent

Energy Company Obligation: Help to Heat

Braintree District Council

2nd October 2018

Name of the lead local Authority: Braintree District Council

Local authority Braintree District Council is acting on behalf of:

Uttlesford District Council

1 Introduction

Fuel Poverty can cause vulnerable and low income households to live in cold, unhealthy homes that are expensive to keep warm and increase levels of debt. Braintree District Council welcomes the new local authority Flexible Eligibility powers for Energy Company Obligation (ECO) Affordable Warmth grant funding as a means to help address this issue.

This will allow Braintree District Council and its neighbour Uttlesford District Council to provide affordable warmth assistance to fuel poor and low income households that are vulnerable to the effects of the cold. Further details about Flexible Eligibility are set out in the Government’s Energy Company Obligation (ECO): Help to Heat consultation response document.

Under the ECO 3 scheme, energy suppliers will be able to achieve up to 25% of their Affordable Warmth obligation by installing energy saving measures in households declared eligible by Local Authorities. This new mechanism, also known as 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. This Statement of Intent (SOI) sets out how households in the districts of Braintree and Uttlesford will be declared to be eligible for ECO 3.

Braintree District Council and Uttlesford District Council are committed to addressing issues of fuel poverty and energy efficiency. Both districts have substantial excess winter deaths and figures. Braintree is comparable to the national average at 10%. Uttlesford has a figure of 25%, more than double the national average of 11.6%.

A proportion of households in both districts are classified as being in fuel poverty, 8.4% and 9.7% respectively. House Condition Surveys carried out in 2015 show that the districts are similar in containing a significant proportion of older building stock that are in off gas locations, 23% and 24% respectively are not on the gas grid.
In Braintree district 16.5% (8503) of private sector dwellings and 20.5% (1699) of private rented dwellings are estimated to have an EPC rating below E.

These district statistics are coupled with ageing population demographics that exacerbate health issues and emphasise the need to address fuel poverty and cold homes.

Braintree District Council and Uttlesford District Council work in partnership with their Clinical Commissioning Groups though arrangements including Health and Wellbeing Boards as well as the countywide Carbon Reduction Officers Essex group (CORE) and wider Association of Local Energy Officers (ALEO), both comprising public, private and voluntary sector groups.

It should be noted that the final decision on whether any individual household will benefit from energy saving improvements rests with obligated energy suppliers or their contractors. Inclusion in a Declaration of Eligibility issued by the Council to a supplier will not guarantee installation of any works that may help reduce fuel poverty. The final decision will depend on:

- identification of measures eligible under Help to Heat
- the supplier’s assessment of the cost effectiveness of installing measures in relation to achieving its obligation
- whether the supplier has achieved their targets or require further measures to meet their Energy Obligation targets.

2. **Flexible Eligibility**

ECO Flexible Eligibility funding is available to private sector households, including owner occupiers and private tenants. In identifying households as eligible under Flexible Eligibility Braintree and Uttlesford District Councils are seeking to enable residents to benefit from funding and will obtain consent from households before including them in a Declaration.

Braintree and Uttlesford District Councils expect any obligated energy supplier or contractor working on their behalf to comply with the Data Protection Act, to fully follow OFGEM requirements for the Energy Company Obligation Help to Heat and to act in accordance with industry best practice in relation to consumer care and quality standards of any works that may take place. These are covered in a separate memorandum of understanding between the Councils and the obligated party.
Both Braintree and Uttlesford District Council will identify households that may benefit from flexible eligibility in a number of ways:

Firstly by identifying fuel poverty. Private tenure households must fit one or more of the following:

- Living in fuel poverty but not in receipt of benefits
- Living in high cost home in relation to energy use
- Low income and vulnerability to cold (LIVC)

These qualifying values will be kept under review, in relation to levels of referrals made, delivery of installed measures and the practices of other authorities. Set out below are the criteria for both living in fuel poverty but not in receipt of benefits and low income and vulnerability to the cold.

a) **Criteria for identifying ‘living in Fuel Poverty, but not in receipt of benefits’**

For those living in private tenure the following will be assessed:

- Households not in receipt of income related benefit will be assessed using the following income thresholds:

<table>
<thead>
<tr>
<th>Household composition</th>
<th>Annual household income</th>
<th>Monthly household income equivalent</th>
</tr>
</thead>
<tbody>
<tr>
<td>One adult (working age)</td>
<td>£12,000</td>
<td>£1,000</td>
</tr>
<tr>
<td>One adult (retired/over 65)</td>
<td>£12,000</td>
<td>£1,000</td>
</tr>
<tr>
<td>2 adults</td>
<td>£17,000</td>
<td>£1,400</td>
</tr>
<tr>
<td>2 adults and children</td>
<td>£23,000</td>
<td>£1,900</td>
</tr>
</tbody>
</table>

- If a household has an income under these thresholds, depending on composition, then it will be identified as being ‘low income’.

- The Councils will cross reference data which they hold in their House Condition Surveys or can access on Energy Performance Certificates/SAP ratings.

- Low income households living in energy inefficient housing in the private rented sector will be identified through enforcement activity under the Housing Act 2004.

- Households will be considered to be at risk of fuel poverty if they are in a high cost home in relation to fuel use:
  - a) High Cost; Property with an Energy Performance Certificate (EPC) rating of F or G.
  - b) High cost property EPC of E and one characteristic of fuel poverty or hard-to-treat home: mainly families, child under 16 resident in the household, vulnerable elderly, over the age of 65. Living in a hard to treat
home property has solid walls, non-standard cavity walls, system built walls or has no loft.

b) Criteria for identifying low income and vulnerability to cold
The Councils will target households containing people with the following characteristics, which reflect the National Institute for Health and Care Excellence (NIICE) 2015 guidance on excess winter deaths and illness caused by cold homes. Specifically these have one or more members who are:

- Older people (aged over 60 and particularly those over 75)
- Dependent children of 18 years or younger
- People with Respiratory / Cardiovascular conditions
- People with long term or terminal illness
- People with mental health conditions
- Pregnant women
- People who have attended hospital due to a fall
- People with disabilities
- People who move in and out of homelessness
- Recent immigrants, asylum seekers and refugees (if living in private tenure)

Any referral or enquiry received that does not meet the above requirements will be considered on a case by case basis

3. Referrals
Braintree and Uttlesford District Councils will ensure appropriate referral processes are in place while maintaining the protection of personal data. Braintree District Council and Uttlesford District Council will work with partner agencies to determine those that may be vulnerable due to living in a cold home, suffering from a qualifying medical condition.

4. Evidence, monitoring and reporting
Braintree and Uttlesford District Council will record key information including the number of referrals made and the number of funded installations delivered for reporting both to BEIS and future Home Energy Conservation Reports.
5. **Governance**

This Statement of Intent (SOI) is signed on behalf of Braintree and Uttlesford District Councils by:

**Mark Wilson**  
Sustainability Manager  
Braintree District Council/Uttlesford District Council  
Telephone: 01376 552525 Ext 2325 01799 510511  
Email: marwi@braintree.gov.uk mwilson@uttlesford.gov.uk

Signature:

Declarations will be signed on behalf of Braintree and Uttlesford District Councils by:

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Sustainability Manager  
Braintree District Council/Uttlesford District Council  
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Signature: