

## Folkestone & Hythe District Council Home Energy Conservation Report 2021 Headline and Overview

1 Does your local authority have a current strategy on Carbon Reduction and/or energy efficiency for domestic and non-domestic properties? **Yes**

2. If YES, [Read our Carbon Action Plan](#)

F&H DC works closely with County and other District/ Borough Councils in Kent and supports the [Kent Environment and Low Emissions Strategy](#).

Kent Fuel Poverty Strategy is due to be updated to align with these.

3. What scheme(s) is your local authority planning to implement in support of energy saving/carbon reduction in residential properties in the next two years

- It is difficult to look forward with the constant changing of the government schemes (LAD2, LAD3/HUG etc)
- F&H District Council has actively engaged with LA Flex/ ECO scheme and will continue to promote to residents in the next iteration of the scheme.
- F&H District Council has been working with the GSEEH to deliver LADs2 for council housing stock but are finding it difficult to meet the timescales imposed.
- F&H will be looking to deliver HUG/Sustainable Warmth Competition within the district to maximise benefit for the District residents. We are considering recruitment of a specialist to help us with this work.
- PSH – MEES engagement/ enforcement – promotion of the MEES regulations has taken place through landlord forums and tag lines on the bottom of correspondence with landlords. Any properties found during normal inspections are taken to task over MEES if found to be non-compliant. No proactive enforcement has taken place due to staff capacity and current workloads.
- COVID Winter Food and Fuel Scheme – government grants have been used to help local residents affected by the pandemic with winter fuel bills and food banks.

[Go to our climate change page](#)

[Go to our Local Plan page](#)

Hospital discharge scheme run in partnership with Peabody South East Ltd (Home Improvement Agency) includes energy measures such as installation of boilers and insulation.

Better Care Funding / Housing Assistance for vulnerable residents – Winter Warmth repayable grant scheme for over 65yrs, and chronically sick residents who are in receipt of benefits. (10 year repayment condition).

Home safe loans for vulnerable people who do not qualify for winter warmth repayable grants or ECO measures. Used for installation of heating and insulation as part of wider repair works to reduce hazards in the home.

Data analysis – BRE Housing data/ C Path/ analysis through EPC/ Offgas data

4. What has been or will be, the costs of running and administering the scheme(s), such as the value of grants and other support made available, plus any other costs incurred as desired

PSH team energy efficiency work and MEES work – 15% Team Leader FTE 5% x 3.6 PSH Officer FTEs

WARM HOMES FUND – ADMIN COST INCLUDED – WENT TO PARTNER

Winter Warmth Loan spend - £25K per year.

5. What businesses, charities, third sector organisations or other stakeholders do you work with to deliver the scheme?

- SSE/ECO Energy Companies
- SGN
- Aran Services Ltd
- Contracted providers through GSEEH dynamic purchasing scheme
- CCG/ Health practitioner, Adult and Children's social services
- NHS hospital discharge teams
- Home Improvement Agency
- Private Landlords and agents
- Occupational Therapists, voluntary groups, Care Navigators.
- GSEEH, Kent and Medway Sustainable Energy Partnership, Kent Energy Efficiency Partnership.

## 6. What has been or will be the outcome of the schemes?

- Carbon Saving - Not currently measured by LA.
- Alleviation of fuel poverty - Not been measured by local authority.
- Health improvements through hospital discharge scheme – Approx 125 people per year
- Advice and support to 70 people through LA flex referrals.
- Aran Services – Data on numbers of ECO.- unable to obtain this data in time.

68 ECO flex declarations since 2019.

18 Winter warmth loans administered since 2019.

## Communications

## 7. Does your LA provide any advisory services to customers on how to save energy?

- Simple Energy Advice website
- Council own website
- Warm Homes call centre until March 2021
- Council officer time/resources
- Home Improvement Agency – refer for winter warmth repayable grants/Home safe loans.

## 8. How do you communicate or encourage energy saving amongst domestic consumers and/or local businesses?

- Warm Homes call centre in operation until March 2021
- PSH Teams – Home Visits – but this have been impacted by Covid
- Social media campaigns and energy saving advice
- MEES enforcement letters to be sent
- Radio KENT by Chair of KEEP – Talking about fuel poverty strategy and action across Kent
- Landlord Forums/Events
- Rise 4 Disability Events
- Local Green Supply Chain

## 9. Have you made any assessment or undertaken any analysis of the existing capacity in your local energy retrofit supply chain to support the decarbonisation of buildings by 2050? No

GSEEH have a Dynamic purchasing scheme

10. What actions are you taking, if any, to upskill and/or grow the local energy efficiency installer supply chain?

- KCC Installer workshops
- KCC Locase/ STEM Programme
- Regional working with the Energy Hub

11. What actions are you taking, if any, to promote energy efficiency and the installers supply chain to consumers and encourage households to consider energy retrofit?

- Promotion of whatever will replace the Green Home Grant.
- Winter Warmth loans
- ECO & LA Flex

12. If not action is taking place in either of these two areas, please let us know of any barriers you have encountered.

- Lack of trust and changing guidelines – hard to keep up to date
- Geographic/Economic limitations in Kent
- Sustainability of government schemes
- Installer network availability due to geographic and economic limitations (also lack of skilled traders).
- Covid has dramatically impacted on uptake and engagement with residents (restrictions on face to face interaction and safe working practises).

13. How effectively is your LA able to engage Trusted Marked PAS2035/0AS2030 certified installers?

SEE 12 ABOVE

Lack of trust marked approved installers highlighted by Green Homes Grant and searches on Simple Energy Advice Website.

Working with Energy Hub and appointed consortium manager in future to improve this.

14. Do you have any plans to develop policies or initiatives in this space over the next five years as part of supporting local decarbonisation efforts?

- NO - as GSEEH doing upskilling and training and their own events.
- Outcome of GSEEH dynamic purchasing scheme may increase number of local qualified installers.
- Social Housing – (Council stock only)

15. What action, if any, has your LA taken to install energy efficiency or low carbon heat measures in social housing? Have these been installed to a satisfactory quality? What actions (if any) have your social housing partners taken?

We have commissioned a pilot project (Ross House) where we are looking at the options to retrofit a high performance low carbon space and hot water heating system to this block of 16 residential units. The implementation of those recommendations we envisage leading the way to setting a direction for retrofitting low carbon heat measures to those across our housing portfolio where required.

16. Do you have easy access to the information/knowledge within your organisation that you would expect to need for social housing retrofit projects? (e.g. stock condition; property data; approach to procurement; alignment with existing internal maintenance/upgrade plans; tenant engagement and management plans; costings

There is some existing knowledge within housing which is developing through varying seminars and CPD sessions. Furthermore, our pilot project at Ross House is via the use of specialist consultants within the low energy field.

We therefore buy in specialism as may be required to bridge knowledge gaps as well as work closely with those consultants to acquire and further build upon internal knowledge.

In respect of the required information, we have commissioned a survey of all our properties with a specific remit to assess for current energy performance and to identify what is required in order to achieve zero carbon by 2030 and/or 2050.

17. If no, would it be easy/difficult to obtain this information? .

Please see above. We have developing knowledge and are able to buy in knowledge as may be required, and we have commissioned a bespoke survey to obtain the required information

18. Have you experienced any challenges to retrofit, including during any previous government schemes you have taken part in (e.g. supply chain, funding, tenant cooperation, mixed tenure, split incentive, policy clarity, etc)? Please provide some detail. Have social housing partners reported any challenges to retrofit?

Not relevant as not yet participated in any such relevant Government retrofit schemes.

Social Housing decarbonisation was introduced with unrealistic timescales to liaise with social housing partners and to build a deliverable project. There are challenges for us in some sectors with limited resources and lack of schemes ready to do when funding is offered.

19. How does your LA currently/how will your LA in future plan to go about identifying suitable housing stock and measures for retrofit? How do social housing partners identify suitable stock? By the same measures or via a different method?

We will be identifying the suitable housing stock via a survey already commissioned through external consultants in order to assess the energy performance of our social housing portfolio and to make recommendations in order to achieve the government 2030/2050 targets.

20. What considerations would make you more or less likely to apply for government funding? If known, what is the opinion of your social housing partners?

This will be assessed once our stock condition/energy survey programme has completed so that we will be in a position to know what is required and to what in order to achieve the targets. We will then be better informed to assess any available funding and apply accordingly.

21. To what extent are social housing tenants willing or unwilling to undergo retrofit, and what are the barriers and facilitators to their participation? If known, is this the same opinion across all social housing tenants or is it different with HA and ALMO tenants?

At the moment this is unknown as we have not yet commenced any such works. In respect of our pilot project to Ross House, the residents have largely been receptive and positive that we are assessing their properties as the anticipation is that this will result in cost in use savings to them.

22. Does the approach to retrofit change for leaseholders in mixed tenure blocks? What encourages them to co-operate?

No definitive approach has yet been established and we are not yet advanced enough in the programme. It is therefore it is too early to be able to answer this. Domestic Private Rented Sector Minimum Energy Efficiency Standards (MEES)

23. Is your authority aware of the PRS Minimum Efficiency Standards regulations requiring private rentals in England and Wales to meet a minimum energy performance rating of EPC Band E as of April 2020, unless a valid exemption applies? YES

24. Which team within your authority is responsible for, leading on enforcement of the PRS minimum standard? Please provide the contact details of the person leading this team

Private Sector Housing Team Leader – Kerry Petts

25. What method or methods does your authority use to communicate with landlords and tenants about the standards and other related issues?

- Website, landlord events, Private Sector Housing Sub-group, partnership working with Landlord Associations, PSH teams have a strong link with landlords.
- PSH Enforcement policy and other information on website.
- Work with letting agents to share information regarding standards.
- We will be contacting landlords of F&G rated properties to give initial advice regarding MEES. We will then move to enforcement if initial contact not acted upon or works progressed.

26. What barriers, if any, does your local authority face enforcing these regulations (e.g. identifying non-compliant properties/landlords, budgeting/resourcing, any legal issues)?

- Many rented properties do not have EPCs due to long tenancy. Where EPCs not available we can deal with issues through the hazard of excess cold using Housing Health and Safety rating System.
- Conservation / listed buildings – restrict the ability to upgrade to good EPC standard.
- Not knowing where all PRS properties are.
- We do not get reactive enquiries from tenants re EPC and proactive work to identify properties in breach of MEEs requires additional resources.
- Not all LAs will have a PRS (borough wide) discretionary licencing scheme e.g. selective or additional in place which may be useful in helping to identify PRS properties.
- MEEs enforcement needs to link with the current HHSRS review to ensure legislation is consistent and in step.

27. Do you directly target landlords of EPC F and G rated properties to enforce these regulations? If yes, how? If no, please explain.

Not currently due to excessive level of reactive work (responding to tenant complaints) regarding all hazards.

## Financial support for energy efficiency

28. What financial programmes, if any, do you have to promote domestic energy efficiency or energy saving? If applicable please outline the budget (and % of the budget that is used), where such funding is sourced and where it is targeted.

- Our own stock - We currently have a programmed budget of £70k for 21/22 to invest in energy improvements such as cavity and wall insulation to our poorest performing properties.
- We have a significant outline budget set aside for our pilot project at Ross House. The extent of the Ross House budget is however yet to be finalised.
- PRS – Disabled facilities grants can sometimes cover the cost of energy efficiency measures as part of the works –e.g. CWI and LI. This is funded through the Better Care Fund.
- Owner Occupiers – DFGs as above, Winter Warmth loans for heating and insulation. Av. £25K per year Better Care Fund). Also Home Safe loans sometimes cover energy efficiency works where Winter Warmth loan not viable. Top up Winter Warmth loans for ECO and ECO flex customers.

29. What future investment for energy efficiency or low carbon heat measures do you have planned, and when are these investments planned for?

- Sustainable Warmth competition – we are in the process of getting approval to recruit a specialist to help us formulate a bid for future competitions.
- We currently have little resource to meet the tight deadlines for bidding for funding and implementation on the ground. The local energy hub is now going to assist us as much as possible with this too.
- Continuation of ECO flexible eligibility
- Allocation of Better care funding for winter warmth and council budget for home safe loans.
- SGN – GAS CONNECTION FUEL POOR HOUSEHOLDS – HELP TO HEAT
- Own stock - For 21/22 we are at the information gathering stage.

This is in two parts; data gathering for our HRA portfolio via the commissioned stock condition and energy surveys and the second parallel part being the pilot Ross House project to explore alternative technologies to best achieve energy performance; zero carbon and low cost in use for the end user.

We hope to commence rolling out the commencement of our energy programme in the financial year 22/23 and onward



## Fuel Poverty

30. Does your Local Authority have a Fuel Poverty Strategy?

[Go to Kent Fuel Poverty Strategy website](#)

31. What steps have you taken to identify residents/properties in fuel poverty? What blockers, if any, have there been in identifying households in fuel poverty?

- Stock modelling report (BRE)
- C-PATH
- GSEEH – EPC Data mapped against LSOA
- Not having access to benefits data/low income data/vulnerability data is the biggest barrier. Access to credit rating scores/Experian data at postcode level would enable greater identification and easier to target people for schemes.

32. How does fuel poverty interlink with your local authority's overall Carbon Reduction Strategy?

Corporate Plan/ Carbon Action Plan/ Kent Energy and low emission strategy.

33. Please highlight any fuel poverty issues specific to your area.

- High proportions of private rented housing, non-English speaking tenants, and people with learning disabilities.
- Digital exclusion – not everyone can access online easily.
- Age of housing stock and high proportion of rural area and off gas properties.
- Houses in multiple occupation – there is a benefits cap on under 35 yr olds which reduces income for that cohort. They have to live in the least expensive properties and live in fuel poverty.
- High housing costs in comparison to other areas of UK.
- Higher energy costs for coastal housing due to increased exposure to the elements.
- Covid must have impacted fuel poverty in the whole of Kent due to job losses and furlough.

34. What measures or initiatives have you taken to promote fuel cost reduction for those in fuel poverty? Include information on partnerships with local businesses or energy providers you have.

COVID supports fund

COVID Hubs working with fuel, banks third sector

35. Has your Local Authority Participated in GHG: LAD?

No. LAD2 bid for council stock was planned but may have to withdraw due to timescales not being workable.

- If yes, please indicate which phase you participated in and briefly outline the project.
- If no, please indicate what barriers prevented you from participation in the scheme.

### 36. Would your Local Authority be in a position to manage the delivery of upgrades through a scheme such as LAD in 2022?

YES, but only with admin support and a consistent reporting method to BEIS. It is important to factor in longer lead in times as well as timescales for delivery to enable engagement and installations and come up with a whole house solution for each property.

Local authorities would much prefer to be able to deliver a whole house solution but these take time and resource to put together. The current mixture of schemes makes it difficult to navigate and plan ahead. It also adds to public confusion and mistrust and an inability to fully fund measures for vulnerable and fuel poor households. A more simplified access to funding would be welcome (similar to Warm Front) would be most welcome.

- If yes, please indicate the anticipated number of homes that could be upgraded per year.
- If no, please indicate what barriers would prevent you from delivering upgrades in your area.

### The Energy Company Obligation (ECO)

The Energy Company Obligation (ECO) is an obligation on energy suppliers aimed at helping households cut their energy bills and reduce carbon emissions by installing energy saving measures. Following the Spring 2018 consultation, the Government set out in its response that ECO3 will fully focus on Affordable Warmth – low income, vulnerable and fuel poor households.

The ECO “Local Authority flexible eligibility” (LA Flex) programme allows LAs to make declarations determining that certain households in fuel poverty or with occupants on low incomes and vulnerable to the effects of cold homes, are referred to ECO obligated suppliers for support under the Affordable Warmth element of ECO. LAs involved in the LA Flex programme are required to issue a Statement of Intent that they are going to identify households as eligible, and the criteria they are going to use; and a declaration that the LA has been consulted on the installation of measures in a home.

### 37. Has your local authority published a Statement of Intent (Sol) for ECO flexibility eligibility? (Y/N)

YES

38. Please answer the following questions to help us to understand LA Flex delivery in more detail:

- How many declarations were issued for low income vulnerable households?  
64
- How many declarations were issued for Fuel Poor households?
- How many declarations were issued for in-fill? NONE
- What is the highest income cap published in your SOI? £30
- If you have used an income over £30k gross, what reason have you given
- Do you charge for declarations to be signed? If so, please state how much?  
NO

## Smart Metering

39. Are you actively promoting this? NO

We do not currently have any plans to implement smart metering in domestic premises. We would like to think that these would potentially be fitted as standard in new build properties, but retro fitting them into residents' domestic properties would be between the resident and the utility supplier.

We have been involved with the swapping of meters to AMR meters with NPOWER on the Landlords supplies we currently have.

We are considering promoting Smart Meter uptake by incorporating into the residents leaflets that and will be compiling with Comms for electrical safety, but will not be able to enforce residents to take them up if there is no legal requirement.

They are not fitted as part of void works to properties as they become vacant.

## Future Schemes and Wider Incentives

40. Please outline any further schemes or wider initiatives not covered above that your local authority has carried out or is planning to undertake to improve energy efficiency in residential accommodation.

None

Report submitted to BIES online on 29<sup>th</sup> June 2021.