



Epping Forest District Council

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EPPING FOREST DISTRICT COUNCIL HOME ENERGY CONSERVATION ACT 1995 (AS AMENDED) PROGRESS REPORT 2019

The Home Energy Conservation Act 1995 ('HECA') requires Local Authorities to submit reports to the Secretary of State demonstrating what energy conservation measures they have adopted to improve the energy efficiency of residential accommodation within that area. Attached is the 2019 progress report for the Department for Business, Energy and Industrial Strategy as requested.

Methodology

New guidance was published by the Department for Business, Energy & Industrial Strategy (BEIS) in January 2019. The format and focus for this HECA report remains as for previous years but also incorporates the requirements of this new guidance. The figures from the 2017 EFDC Progress Report and action plan have also been updated to reflect the current status.

JR Nolan

Signed off by Jim Nolan, Commercial and Regulatory Service Director, Epping Forest District Council

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1.0 INTRODUCTION

- 1.1 Local authorities have responsibilities under the Home Energy Conservation Act 1995, in respect of improving the energy efficiency of all residential accommodation.
- 1.2 The Department for Business, Energy and Industrial Strategy (BEIS) have updated the guidance for reporting and this report sets out the strategic and operational actions being taken in Epping Forest District, or that are planned, to meet the Council's objectives in terms of home energy conservation.

2.0 LOCAL ENERGY EFFICIENCY OVERVIEW

2.1 Background

Epping Forest District Council (EFDC) is located in the south-west of Essex. The District covers an area of approximately 130 square miles. The 2011 Census recorded a population of about 124,660 people living in close to 54,400 dwellings.

Of these approximately 54,400 homes, around 6,500 are managed and maintained by the Council. Besides managing these properties, EFDC continues to work with housing associations to develop new, affordable homes. The Council also gives energy advice, support and offers discretionary financial repayable assistance to those residents living in the private sector.

Residential accommodation in the Epping Forest District currently accounts for a large proportion of the District's CO₂ emissions. To update, the most recent statistical report for local authority and regional carbon emissions can be referenced from the *BEIS publication 26 June 2018 below. Greater London has the lowest Carbon Dioxide per capita emissions compared to other regions due to the urban nature of the transport system, a high population density and a greater proportion of residential areas, meaning large industrial facilities are unlikely to be in the region.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/719182/Local_Authority_CO2_Emissions_Statistical_Release_2016.pdf

Private sector housing (owner-occupied and privately-rented properties) constitutes approximately 82% and 3% respectively, about 85% in total, of the District's total housing stock. We carried out a Private Sector House Condition Survey in 2011 which indicated that the SAP rating of owner-occupied properties was 54 and privately-rented was 51.

The Council still owns its own stock of social housing which accounts for about 12% of the total housing stock. We have carried out surveys on 80% of our own housing stock and found that the average SAP rating is 71. When properties become available, an Energy Performance Certificate (EPC) is produced and the resulting information is added to the Council's database.

2.2 Update on strategy and projects

The Housing Strategy 2017-2022 was adopted by Council's Cabinet on 12 October 2017, following detailed scrutiny by the Council's Communities Select Committee. The Strategy sets out the District's housing plans for the medium term (i.e. over the next 3 years). However, these plans have been formulated with regard to the housing objectives for the long term which, in some cases, can span a period of 30 years. The Housing Strategy will be updated in three five years' time, during 2022, unless there are significant changes required to the Council's strategic approach.

To continue to reduce our carbon emissions for the District, the Council has carried forward a number of actions:

- Information is readily available on the website to both private sector tenants and landlords that explains landlord's obligations to comply with Regulations that set minimum energy efficiency requirements for new lets and renewals from 1 April 2018 and for all existing tenancies after 2020.
- Proactive steps are being taken to identify privately rented properties that fail the Minimum Energy Efficiency Standards and to take action, including enforcement where necessary to ensure properties meet at least an EPC rating of E;
- We have included on our web-site, and continue to update, information on ways to reduce energy use in our residents' homes. This will include information on Smart meters.
- We have included information on our website about how to apply for financial assistance to make homes more energy efficient and to help with heating bills;
- We continue to improve the energy efficiency of our own housing stock within the resources we have available;
- We are in the process of collecting data on levels of Fuel Poverty in the District under the 'low income/high cost definition' to develop an approach to meet the Government's aspirations on fuel poverty. (This is an objective in our developing Housing Strategy). This follows on from a Carbon Reduction and Renewable Energy Assessment and Home Stock Area Report for Epping Forest District;

We have a Memorandum of Understanding with our preferred partner to promote and deliver energy efficiency measures (EEM) to private sector housing across the District. This includes promotion and marketing EEMs available under the Governments ECO3 scheme, to carry out energy efficient assessments, inform customers of options and funding measures and, installations of EEMs where requested. Under the new flexible eligibility criteria for ECO Funding, local authorities can target fuel poor households not in receipt of eligible benefits and low-income households that are vulnerable to the effects of living in a cold home. We have published our 'Statement of Intent' detailing the methodology and criteria for identifying eligible customers and we are working with our preferred partners to identify and refer on to ECO obligated suppliers for support under the Affordable Warmth element of ECO. The Council does not have any additional specific carbon targets. While as a Local Authority we are not bound by the Climate Change Act (2008) targets, as an organisation we are trying to reach the 34% reduction in carbon emissions by 2020.

2.3 Performance on measures

The Council continually monitors the performance of the energy efficiency measures undertaken on its housing stock to ensure the targets set in the 2017 Progress Report plan of action table are met.

For Council properties;

a) Improving SAP ratings:

Currently the number of properties in the lowest SAP Bands is:

NHER Stock Profile 2017;

- Band G = 0 properties
- Band F = 6 properties
- Band E = 393 properties
- Band D = 1236 properties
- Band C = 4309 properties
- Band B = 607 properties

NHER Stock Profile 2019;

- Band G = 0 properties
- Band F = 2 properties
- Band E = 362 properties
- Band D = 1193 properties
- Band C = 4345 properties
- Band B = 652 properties

The table below shows the results of the energy efficiency measures carried out on Council properties over a two-year period between 2017 and 2019;

Energy Efficiency Rating			
Band	SAP Rating	Number of Properties	
Very energy efficient - lower running costs		2017	2019
A+	101-120	0	0
A	92-100	0	0
B	81-91	607	658
C	69-80	4309	4345
D	55-68	1236	1183
E	39-54	393	362
F	21-38	6	6
G	1-20	0	0
Not energy efficient - higher running costs			
Source: NHER Stock Profile 2019			

The table shows that between 2017 and 2019 the number of properties in SAP rating bands F have remained the same and in SAP rating bands D and E have been reduced by;

- Band E = 7.9%
- Band D = 3.5%

And the number of properties in bands C and B have increased as follows:

- Band C = 0.8%
- Band B = 7.9%

The table shows that between 2017 and 2019 the number of properties in SAP rating bands F have remained the same and in SAP rating bands D and E have been reduced by;

- Band E = 7.9%
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and the number of properties in bands C and B have increased as follows:

- Band C = 0.8%
- Band B = 7.9%

Over the next two-years, the Council aims to undertake energy efficiency measures on low SAP properties such that there:

- are no Council properties with inefficient gas boilers in SAP band E;
- is an annual reduction in properties in SAP bands F, E and D;
- is an increase in the number of properties in SAP bands C, B and A.

The average energy efficiency rating for a dwelling in England and Wales is SAP 60 Band D.

b) Installing energy efficient boilers

The Council plan to continue with the programme of installing gas central heating systems based around SEDBUK 'A'- rated boilers so that there are no properties with gas central heating boilers in SEDBUK bands E, F and G by 2020.

An estimated 567 properties with old gas heating systems have been upgraded with 'A'-rated boilers during 2017/18 and 2018/19.

Currently the total number of properties in Council housing stock with inefficient gas central heating boilers is:

SEDBUK Profile 2019;

- SEDBUK Band G = 31 properties
- SEDBUK Band F = 31 properties
- SEDBUK Band E = 209 properties

The table below shows the percentage difference in the number of energy efficient gas boilers installed in Council properties over a five-year period between 2014 and 2019;

Band	SEDBUK range	2011	2014	2019	% difference
A	90% and above	1591	3122	3890	24.6
B	86% - 90%	64	54	55	1.9
C	82% - 86%	0	1315	1137	-13.5
D	78% - 82%	2582	890	562	-36.9
E	74% - 78%	674	388	209	-46.1
F	70% - 74%	515	102	31	-69.6
G	Below 70%	446	162	31	-80.9

Source: Gas maintenance property attributes list

The SEDBUK table shows that between 2014 and 2019 the percentage of properties with efficient SEDBUK A and B rated boilers has increased by:

- Band A = 24.6%
- Band B = 1.9%

and the number of properties with inefficient gas boilers in bands C, D, E, F and G have reduced as follows:

- Band C = 13.5%
- Band D = 36.9%
- Band E = 46.1%
- Band F = 69.6%
- Band G = 80.9%

The Council have around 180 properties that do not benefit from national gas supply and have aging electric heating systems which had to be replaced. The Council commenced a programme of installing Air-2-Water renewable heating systems combined with resident training in order to fully understand the new heating technology. The result was that within 3-years the Council has installed around 140 Air-2-Water renewable heating systems and claimed over £220,000 of energy saving and over the 7-year period will claim more than £510,000 Domestic Renewable Heat Incentive (DRHI) funding through OFGEM.

Around 40 residents refused the installation of the Air-2-Water renewable heating systems and were happy with their existing form of heating. As part of the continuing programme any properties that do not benefit from national gas supply and become vacant are identified and an Air-2-Water renewable heating system is installed before the property is let.

Through the ECO scheme from April 2017 to 31 March 2019 installed energy efficient measures for private sector households are recorded as £188,020 for lifetime savings and 839 tons of carbon savings. This has equated to helping 40 households with such measures across the district.

3.0 FINANCIAL SUPPORT AND OTHER BENEFITS OFFERED TO HELP RESULT IN SIGNIFICANT ENERGY EFFICIENCY IMPROVEMENTS

3.1 Information, Advice, and Financial Assistance

EFDC regularly updates energy saving advice for homeowners on the Council website. Tips include low-cost, no-cost ways to reduce energy, information on where to turn for larger projects, and where funding may be available.

When appropriate, the Council provides information to residents on energy saving tips or when grant opportunities change. For example, EFDC will remind residents how to save energy, engage with alternative energy suppliers offering cheaper tariffs by taking part in the 'Big Switch'.

Private Sector Housing Officers are all aware of the health impacts caused by cold homes and advise on remedial measures and, where available, financial help to provide these. Incorporating the ECO initiative and working with an approved contractor, work is currently under way to identify households in fuel poverty under the new Low Income High Cost (LIHC) definition with a view to taking a more targeted approach in 2019 and beyond.

The Council provides discretionary financial assistance to private sector residents by way of Decent Homes Repayable Assistance and Small Works assistance. The first is a means tested, repayable grant of up to £10,000 for work to bring properties up to the Decent Homes Standard; the second is for smaller works of up to £3,000 that can be specifically for improvements to thermal comfort. This forms part of the Housing Strategy 2017 – 2022 and the funding is met from Council resources.

C.A.R.E. (*Caring and Repairing in Epping Forest*) is the Council's Home Improvement Agency service which is managed and run in-house by the Council. It helps people in need of care and support in the private housing sector, mainly those who are older and/or disabled, to live independently in the community for as long as they want to do so.

The range of services provided by C.A.R.E. includes:

- Housing related information, home energy saving advice and practical support planning;
- Handyperson services to provide low cost energy efficient measure;
- Assistance with obtaining funding for home improvements and or energy efficient measures; and
- Signposting to additional support services and associated energy schemes.

3.2 Fuel Poverty

Upgrading the energy efficiency of homes is the most sustainable means of tackling fuel poverty. Fuel poor households in Essex are disproportionately concentrated in the least energy efficient homes - more than 21% of fuel poor households live in homes rated D and E or below, compared to just 2% among the wider housing stock. The Government has a statutory target to raise as many fuel poor homes in England as reasonably practicable to energy efficiency Band C by 2030, with interim milestones of as many fuel poor homes in England as reasonably practicable to Band E by 2020 and Band D by 2025.

A household is considered to be fuel poor if it has higher than typical energy costs *and* would be left with a disposable income below the poverty line if it spent the required money to meet those costs. It captures the fact that fuel poverty is distinct from general poverty: not all poor households are *fuel* poor, and some households would not normally be considered *poor* but could be pushed into fuel poverty if they have high energy costs. Fuel poverty is therefore an overlapping problem of households having a low income *and* facing high energy costs

Fuel poverty in England is measured using the Low Income High Costs (LIHC) indicator. Under the LIHC indicator, a household is fuel poor if:

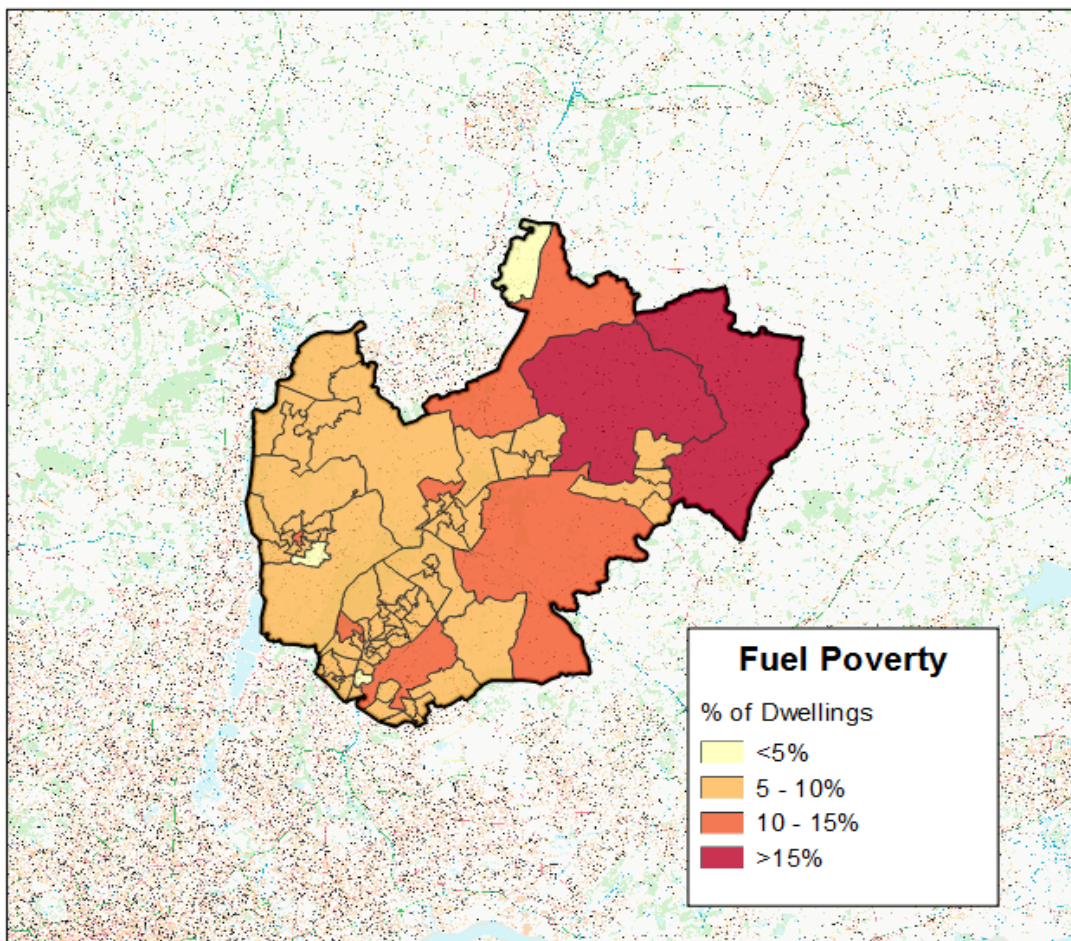
- they have required fuel costs that are above average (the national median level) and
- were they to spend that amount, they would be left with a residual income below the official poverty line.

The table below, from The Annual Fuel Poverty Statistics Report 2018 - England, provides sub regional fuel poverty data with Epping District in context and proximity to sub regions. Whilst the data suggests that the proportion of fuel poor households in the Epping District is lower than the region, there remains a significant number of households that struggle to keep their homes warm at an affordable cost.

Region	Number of households	Number of households in fuel poverty	Proportion of households' fuel poor (%)
Epping District	54,700	4,411	8.1
East	2,545,122	239,431	9.4
London	3,416,139	341,094	10.0
South East	3,755,000	336,585	9.0

A report in 2017 by the Energy Savings Trust, using its Home Analytics housing stock database identified the rates of fuel poverty across the District as shown by the spatial analysis diagram below. The darker red areas indicate higher rates of fuel poverty where fuel poverty schemes may be most successfully targeted. LSOA means Lower Layer Super Output Area, a geographic hierarchy designed to improve the reporting of small area statistics in England and Wales.

Epping Forest District Council - Fuel Poverty by LSOA



As part of the current Housing Strategy 2017- 2022 the following measures will be implemented in part to tackle fuel poverty in the District;

- Providing small grants (under £500) to residents in the private sector that are on low incomes for low-cost energy efficiency interventions
- Small Works or Decent Homes Repayable Assistance to eligible residents in the private sector whose homes fail the Decent Homes Standard
- All officers in our Private Sector Housing teams are trained and can give advice on heating, insulation and energy efficiency
- Bringing the condition of as many as possible of our Council-owned residential properties up to a standard in excess of the Decent Homes Standard to avoid high energy use; and
- Providing budgeting support and advice through specialty trained officers to help those who are concerned about paying for their fuel, or other budgeting and money matters.
- Implementation of ECO funded works with approved specialist contractor.

Enforcement where necessary of sub-standards properties in the private rented sector to ensure they have at least an E rated EPC (unless exempted).

3.3 ECO Funded Works

As mentioned earlier the Council is now able to determine eligible homes in the private sector under the new ECO 'flexible eligibility' mechanism. This is primarily aimed at targeting fuel poor households not in receipt of the eligible benefits and low-income households that are vulnerable to the effects of living in a cold home. It allows local authorities to define the eligible households living in, or at risk of fuel poverty and have some latitude to go beyond that, where they find households vulnerable to the effect of cold homes. The aim is to allow this approach to work in a straightforward way, with a focus on two documents: a Statement of Intent from the local authority 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. This Council has recently published its [Statement of Intent](#) under the ECO3 Flex scheme whereby energy suppliers are able to meet up to 25% of their obligation through targeted declarations. The criteria used to identify households eligible for the Scheme through the Statement of Intent ensures that the fuel poor and vulnerable households benefit most.

The Council works with a specific contractor to carry out energy efficiency work on the Council's own housing stock and claim back ECO funding on the measures installed.

The majority of Council-owned residential properties are fitted with loft and where possible cavity wall insulation, we will continue to carry out insulation improvements and upgrades when identified during inspection surveys to properties.

Energy efficiency measures are identified and prioritised through:

- Details on Energy Performance Certificates for each property
- Stock Condition Surveys carried out by EFDC; and
- General tenant queries and requests for works.

3.4 Smart Meters

While the Smart Meter roll out is being managed by utility companies, EFDC recognises that it has a part to play to ensure that residents are fully acquainted with the facts so that they can decide if to have a Smart Meter installed.

The Council is currently looking at ways to provide the necessary information to the staff that give housing support to residents including the information that Smart Energy GB has made available. We are also planning:

- A briefing session, provided by a national energy advice charity, for all relevant staff
- Providing information to our own tenants and leaseholders via our tenants and leaseholders' newsletters; and
- Providing information all our residents by appropriate means such as using social media, press releases and articles on the Council's own website.

3.5 Minimum Energy Efficiency Standards in the Private Rented Sector

The Minimum Energy Efficiency Regulations (the Regulations) apply to all privately rented properties in England and Wales. The Regulations are designed to ensure that those tenants who most need thermally efficient homes, particularly vulnerable people and the fuel poor, can enjoy a more comfortable living environment and lower energy bills.

Since 01 April 2018, landlords of relevant domestic private rented properties must not grant a tenancy to new or existing tenants if their property has an EPC rating of F or G and from 01 April 2020 the rules apply to all tenancies. Where a property is sub-standard, landlords must normally make energy efficiency improvements which raise the EPC rate to minimum E before they let the property. In certain circumstances, they may be able to claim an exemption and the Government has also introduced a maximum cap of £3,500 that landlords are expected to spend towards energy efficiency improvements.

Local authorities have enforcement powers to ensure that landlords meet their legal obligations under these Regulations and the Housing Act 2004, that assesses a range of potential hazards, including damp and excess cold. While some landlords of F and G rated rental properties may be able to claim valid exemptions from the requirement to improve a property to EPC E, this exemption will not excuse them from meeting the existing obligation to keep their property free from serious hazards. Officers in the Private Sector Housing team will use both enforcement powers to ensure that substandard properties are improved to a satisfactory level as soon as possible.

Through a process of mapping various data bases of information including publicly available data on property EPCs, approximately 80 properties have been identified as likely to be failing the minimum energy efficiency requirements. These properties and landlords will now be targeted to ensure improvements are carried out to meet the required standards for energy efficiency and excess cold, or where they meet the exemption criteria, they are recorded as such on the Exemptions Register.

APPENDIX 1

NEW ACTION PLAN 2019

ACTION	DETAIL	PROGRESS AND MILESTONES
<p>1. Local Energy Efficiency Priorities</p>	<p>1.1 Incorporate measures to address Fuel Poverty into a corporate strategy.</p>	<p>The Housing Strategy 2017 – 2022 is in place and includes measures for Fuel Poverty to be addressed in the District.</p>
	<p>1.2 Continue to carry out surveys on our own residential stock to determine SAP ratings until we reach 100% of our own housing stock.</p>	<p>When properties become available, we carry out EPCs for any not on the database.</p>
	<p>1.3 Analyse and report the SAP ratings on our own residential stock annually.</p>	<p>April 2020 April 2021</p>
	<p>1.4 Continue to develop and populate the NHER database with full EPC level data set.</p>	<p>All Council stock to have EPC completed and populate NHER database by March 2025</p>
	<p>1.5 That the average SAP rating of our own housing stock will increase annually (as recorded on the NHER database).</p>	<p>April 2020 April 2021</p>
	<p>1.6 Continue with the programme of installing gas central heating in our own residential stock so that there are no properties with heating systems in SEDBUK bands E, F and G by 2020.</p>	<p>March 2020</p>
	<p>1.7 Replace all inefficient electric storage heating with renewable heating by 2022.</p>	<p>March 2022</p>
	<p>1.8 Develop an agreed approach, with targets, to the reduction of fuel poverty (timescale dependent on further data being made available by the Government).</p>	<p>March 2022</p>

MEASURES PLANNED TO SIGNIFICANTLY IMPROVE ENERGY EFFICIENCY IN OUR RESIDENTIAL ACCOMMODATION		
<p>2. ECO, DRHI and other Schemes</p>	<p>2.1 Continue to install air source heating under the DRHI funding opportunity to ensure off-gas properties have a less carbon intensive heating source.</p> <p>2.2 Develop the Council energy efficiency/Fuel Poverty programme taking advantage of available schemes.</p>	<p>Target of March 2022</p> <ul style="list-style-type: none"> • The Domestic Renewable Heat Incentive (DRHI) is a government financial scheme to promote the use of renewable heat. Changes to the scheme have been introduced in two stages, on 20 September 2017 and 22 May 2018 as part of the response to the 2016 Government consultation. The Council is currently installing measures in all identified Council owned properties where no gas supply exists. • The Council will continue to take advantage of ECO schemes • Currently the Council have no properties in SAP band G, and as of March 2019 only 6 properties are in band F.
<p>3. Feed in Tariff Scheme</p>	<p>3.1 <u>Note changes to the scheme</u></p> <p>The scheme has stopped accepting new applications after 31 March 2019.</p> <p>If solar panels installed had a Microgeneration Certification Scheme (MCS) certificate issued by 31 March 2019 applicants can apply to your energy supplier until 31 March 2020.</p> <p>https://www.gov.uk/feed-in-tariffs</p>	
<p>4. Minimum Standards in Private Rented Accommodation</p>	<p>4.1 Make information on the legislative requirements via our website, e-newsletters and our social media avenues.</p> <p>4.2 Notify private sector landlords the Private Sector Housing team currently deal with of the forthcoming requirements. Use available EPC data to target action/ enforcement at those properties that with in band F or below.</p> <p>4.3 Carry out enforcement action where landlords fail to comply with the legislation.</p>	<p>Private rented properties that fail the MEES have been identified through a process of GIS mapping and layering of EPC and council available data. Approximately 80 properties have been identified for initial targeting which include engagement with landlords and enforcement using the Energy Efficiency Regulations or Housing Act 2004 under HHSRS as appropriate.</p> <p>April 2019 and ongoing</p>

<p>5. Energy Advice to residents</p>	<p>5.1 Provide advice on oil clubs, fuel switching, reducing fuel bills via website, face to face and telephone contact.</p> <p>5.2 Continue to use the Council's communication channels to best effect to provide appropriate advice and information on energy efficiency to householders.</p>	<p>Energy saving information is updated on the Council website.</p> <p>Energy switching auctions publicised (dependent on Essex County Council time scales).</p> <p>Ongoing – mainly via Council website and officer visits where it is appropriate to discuss energy efficiency or heating matters.</p>
<p>6. Smart Meters</p>	<p>6.1 Relevant staff in front line roles to receive training on Smart Meters.</p>	<p>April 2019 and on going</p>
<p>7. Additional Measures</p>	<p>7.1 Continue discussions with partners in the delivery of cross-tenure, ECO-funded Schemes on 'hard-to-treat properties'.</p>	<p>This work is continually planned into the EFDC works programme, and partners sought to assist when necessary.</p>