

Carbon Action Network

reducing carbon emissions and fuel poverty



13 July 2012

FAO Steve Ives, DECC

Dear Steve

Many thanks for providing the opportunity to examine the draft HECA guidance. Since its publication on the 2nd July, members of the CAN Executive have submitted comments through an email exchange, and the matter was discussed at length at the CAN Executive meeting in London on 12 July.

As you may know, there has been great interest in HECA across the Carbon Action Network for some months now and we have received thoughts and comments from many of our local authority members across the country. For example, my colleague John Kolm-Murray (Chair, London CAN) canvassed opinion from HECA workshops at CAN conferences in York (March 2012) and Chelmsford (June 2012), and detailed notes of these workshops are available. The matter was also covered in our wide-ranging membership survey in 2011.

In this letter I will provide our strategic 'headline' thoughts followed by a number of bullet points relating to the detail of the guidance.

We strongly support the statutory obligation that the Act represents as we believe this requirement will ensure that all Energy Conservation Authorities play a significant role in the delivery of carbon, fuel poverty, energy efficiency and health ambitions.

We broadly support the draft guidance and have provided a number of suggestions which we believe will strengthen the aims of the guidance as we understand them.

It is worth making a general point at the outset in relation to the thorny issue of funding. As you know many, if not most, ECAs have supported CERT and other related schemes financially for a variety of reasons since the Act first came into force. For example, local authorities are interested in maximising uptake in their areas through the removal of barriers such as price, acceptance and concerns regarding quality. We have also had great success in targeting resources to areas or customers we believe are in the greatest need. We believe there is a need for continued funding in order to ensure the success of ECO, Green Deal and other programmes. For example, whilst we are very keen to attract ECO Affordable Warmth resources to our areas - and more specifically to the right people - it is unlikely that many of the qualifying customers will be able to make the financial contribution that will almost certainly be required to take up the measures they so desperately need. Local authority financial support will be needed to ensure the obligation is met, just as it has been in the past.

Many other examples of local authority financial and expertise input can be provided. Whilst we are not expecting a ring-fenced Exchequer fund to support local authorities to be created, helpful though that would be, we believe it is important that DECC recognises the need for this financial and intellectual contribution. This is important because the guidance rightly encourages local authorities to have ambitious plans and targets in place. However, the severity of cuts that local

authorities have made and will continue to make are likely to suppress ambition to a level lower than we would otherwise like it to be.

On a more practical note, in order to implement HECA effectively and to provide a meaningful and useful initial report it would be extremely helpful if EPC data for each address in our areas could be provided free of charge at the earliest opportunity. I have calculated that the cost of purchasing software upgrades, EPC data and importing data to our energy database would cost about £7,000. This is for the city of Plymouth with a population of 250,000; the cost for other authorities will vary and for many could be higher as they do not have an energy database in the first place. Provision of EPC data free of charge would reduce this cost by about half. As you know, availability of quality data from EPCs and other sources is essential if we are to understand and quantify numbers and needs in our areas such as, for example, the number of homes that might qualify for ECO and the mix of measures that might be appropriate for those homes.

It will be necessary for ECAs to compile a great deal of data from a variety of sources in order to understand the extent and depth of need in our areas and develop meaningful ambitions for inclusion in delivery plans. At present there remains considerable uncertainty with regard to the implementation of ECO and Green Deal and we imagine this uncertainty will only slowly evaporate over the next six months or so. For these reasons we believe the March 2013 deadline for publication of the initial HECA progress report may be too ambitious. Whilst it may be possible to produce a headline document with broad and probably unquantified aims by March, a full report could not be produced until August or September 2013. Certain key data sets are not due to be published until late spring/early summer 2013 and we would very much like to include this data in our initial reports.

Because most local authorities are familiar with annual reporting for internal purposes, it would also make sense to provide a HECA progress report annually. This would ensure that HECA remains as a priority on local authority agendas.

On a more philosophical note, we believe that the HECA guidance offers an excellent opportunity to link DECC and Department of Health objectives and could be considerably strengthened in this regard. This is not only to ensure that ECAs consider health issues in the progress reports and delivery plans, but also because we believe opportunities for DH/NHS funding exist that could have substantial beneficial impacts on both carbon reduction and improvements in affordable warmth and general well being. There are clear links with the Cold Weather Plan and tackling cold-related medical conditions and excess winter mortality. Perhaps mention could be made of the importance of the involvement of ECAs - and in particular the named HECA officer - with Well Being Boards and other bodies that are being set up or have recently been set up as part of the emerging health landscape. Incidentally, the requirement for each ECA to have a named HECA officer is critical, as a range of external partners - including those in the field of health - will need to have a single point of contact for energy efficiency and fuel poverty - and know who that person is.

Some ECAs have worked very hard over many years to develop and operate schemes that seek to reduce cold-related illness and tackle fuel poverty and have successfully added value to national schemes. Many of us wish to continue with this work, funds permitting, and which is very unlikely to be undertaken if left to the market. We therefore believe that more emphasis should be placed on reporting the health and fuel poverty aspects of our work, if only as a means of assessing the value added to Green Deal, ECO and other initiatives. Given the emerging carbon reduction policy landscape the growth agenda is also very important, with ECAs keen to develop the local skills base and business sector that will deliver the hoped-for increase in demand for a wider range of products, further value-added issues for inclusion in reports.

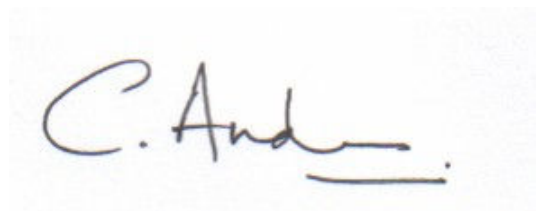
A number of specific issues have been raised in our discussions and consultations; these are summarised below.

- Sign-off by the Chief Executive is regarded to be very important. Where appropriate, additional sign-off by a Health Board/Director of Public Health would be very helpful.

- Some broad common structure to reports might be helpful, with clearly defined sections such as Energy Efficiency, Carbon Reduction, Fuel Poverty, Health/Cold Weather Plan - with perhaps ambitions/targets for each.
- Perhaps there is undue stress on the street-by-street delivery method, which is not the only one and may not always be the best.
- Benchmarking is an issue for some ECAs; this could be useful but would require a common methodological approach to ensure we are comparing like with like; this was, of course, a problem with the 'original' HECA guidance.
- Most ECAs have targets and delivery plans; it may be helpful to specifically ask LAs where they expect to be in, say, 2020 and 2050.
- Remember that the Carbon Action Network already exists as a forum "...to provide feedback to national Government..." and was originally set up as the HECA Fora Network, in 1999, to support and represent the views of local authority HECA officers.

I recognise that this is a somewhat brief summary of our thoughts and I am therefore more than happy to discuss any of these or related matters with you at greater length either by telephone or a meeting at your offices in London. As the officers who will be delivering HECA and who will also be making a substantial contribution to the success of Green Deal, ECO, RHI and other initiatives we have a strong interest in getting it right. I look forward to discussing with you further.

Yours sincerely

A handwritten signature in blue ink that reads "C. Anderson". The signature is written in a cursive style with a horizontal line underneath the name.

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(Chair, Carbon Action Network)

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