

Carbon Action Network

reducing carbon emissions & fuel poverty



Warm Front Team
Consultation Response
Department of Energy & Climate Change
1st Floor Area D
3 Whitehall Place
London SW1A 2AW

Dear Warm Front Team

Please find the response to the consultation regarding the proposed changes to the Warm Front scheme eligibility criteria from the Carbon Action Network.

The Carbon Action Network (CAN) is a not-for-profit organisation supporting local government officers with a remit for reducing all aspects of the UK's domestic-sector carbon footprint and tackling fuel poverty.

The Carbon Action Network was created from the UK Home Energy Conservation Association (UK HECA) in response to the Government's expected repeal of the Home Energy Conservation Act, and the introduction of the climate change National Indicators.

The Network's core activities offer members conferences, a free quarterly magazine and website, dissemination of information and a voice to government through consultations and representation.

After consultation with its members, CAN wish to submit the following response.

Response to Consultation – Amending Reference to the Warm Front Eligibility Criteria

Consultation Question 1

While CAN understand the need to reduce the numbers of those who access the grant due to reductions in funding, we do not agree with the proposals to amend the eligibility criteria.

The current scheme applies to those over age 60 in receipt of a range of qualifying benefits including Council Tax Benefit and Housing Benefit.

The proposed amendments reduce the number of eligible benefits and exclude those over age 60 in receipt of Council Tax Benefit and Housing Benefit. Both of these are



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means tested benefits and only available to those on a low income. Removing these criteria will have a disproportional effect on those over 60 on low incomes who according to the consultation documents make up 50% of households in fuel poverty and will no longer be able to access the Warm Front Grant. The grant will also target those people who are disabled or have a long-term illness. How will these people be assessed particularly those with a long-term illness? Any such assessment outside of benefit criteria will increase administration costs.

The current scheme also applies to Householders with a child under 16 in receipt of qualifying benefits, including Council Tax Benefit and Housing Benefit and Income Support.

The Amended Scheme will reduce eligibility to households with Children under five and exclude those in receipt of Council Tax and Housing Benefit.

This is despite the fact that 17% of fuel poor households have children under 16. The Consultation document states that:

2.5 “Families with dependent children account for 15-20% of fuel poor households. We also know that children under the age of five in households of working age that are not in employment, are at risk of cold related problems, such as respiratory illness and developmental problems. *Cold homes also increase the time taken to recover from other illnesses so that children may be off school more, affecting their education and development. Fuel poverty can therefore impair the opportunities available for children*”.

The proposed amendment will exclude many families with children between ages 5 to 16 who are at risk from fuel poverty, when it is clear that living in fuel poverty can disadvantage children between the ages of 5 and 16.

The reduction in Warm Front budget has already severely impacted on the number of applications being made and increased waiting times which can mean people living without heating or hot water for months. Local authorities promote the Warm Front scheme to residents as being a key process to provide affordable warmth, in particular by installing central heating or replacing boilers. We talk to many vulnerable households throughout the year who need this vital service, without which many elderly, young and vulnerable people may suffer the effects of fuel poverty and the effects of cold weather.

If these proposals are implemented many local authorities will have no method to assist many of the most vulnerable in society creating greater problems around health and well-being. Many local authorities who did carry out schemes to support Warm Front and tackle fuel poverty are also either withdrawing these schemes or cutting them back due to Government funding cuts.

Clarity on these groups that are currently eligible for help, but will no longer receive assistance, is required.

Also the proposals do not say whether the scheme will continue to offer £300 vouchers to those over age 60 who are not eligible for the full grant? CAN feel that if Warm Front has to prioritise need because of a funding reduction then this should be discontinued as it doesn't target the vulnerable.

Consultation question 2

Thermal Efficiency - Proposal to target households where thermal efficiency is low using SAP rating together with eligibility criteria.

We do not agree with the proposal to apply a maximum thermal efficiency level to households applying for Warm Front nor with setting the SAP level at 55.

Applying a SAP assessment to the financial/benefit assessment would seem to complicate the Warm Front Grant scheme and add to its administration costs.

The proposals do not specify how a SAP assessment will be carried out, at what stage, and who by, and what the costs will be. If the grant focused upon assisting the most vulnerable through the replacement of heating systems rather than improving the general thermal performance of the property through insulation, which can be carried out by CERT funding, then this requirement will not be needed, saving money which can be used towards more measures.

If SAP data is required, will EPCs be used to provide SAP rating where these are available? And if so will local authorities have access to the data.

Also, is it the Standard Assessment Procedure or the Reduced Data Standard Assessment Procedure that will be used?

There is also potential for confusion for applicants, who may be vulnerable and disadvantaged. They may find they are eligible for the scheme but then find their SAP rating excludes them. It is difficult to see how these issues can be communicated effectively to applicants in a manner that they will understand, e.g. how will a householder know what the SAP of their property is without an assessment? This would also create a needless delay in carrying out work.

Finally on a general note, will aid still to be available to all private sector households including private rented? Are there not more suitable measures for targeting Private rented properties such as the Health and Safety Rating System.

Overall while CAN understand and accept the need for changes to be made, we feel that the suggested changes are cumbersome, unwieldy and may well increase administration costs (e.g. carrying out a SAP assessment) when it should be more streamlined in this aspect.

Yours sincerely



Andy Stephenson
Chair of the Carbon Action Network