



Response from the UK Home Energy Conservation Association to the DTI's “Consultation on Guidance to Local Authorities in England and Wales on Climate Change Mitigation and Fuel Poverty”

1. Introduction to UK HECA

- 1.1 The UK Home Energy Conservation Association (UK HECA), previously the National HECA Forum, supports and represents local authority energy officers working to reduce the domestic carbon footprint and tackle fuel poverty. It comprises officers from the 379 Energy Conservation Authorities across the ten regional and devolved HECA fora in England and Wales, with the Northern Ireland HECA Forum and the Scottish HECA Officers' Network as associate members.
- 1.2 Fora and networks such as UK HECA can play a valuable role in supporting LA energy officers, particularly those who are new to the issues or whose authority may historically have provided limited leadership and support in this arena. UK HECA would therefore be very interested to explore with Government how it might be able to further help to reduce the up front resources required by local authorities in developing their approach to this agenda. UK HECA will of course be able to assist Government in the dissemination of the Guidance once it has been issued.

2. General comments

- 2.1 UK HECA welcomes the opportunity to contribute to the “Consultation on Guidance to Local Authorities on Climate Change Mitigation and Fuel Poverty”, issued in May 2007. UK HECA believes that there is a pressing need for new and comprehensive guidance to local authorities on mitigating climate change in their areas.
- 2.2 UK HECA also welcomes the inclusion of fuel poverty in the Guidance, particularly as focus on this issue has waned as climate change has risen up the agenda. However, because we believe there is already a great deal of useful guidance on this issue, our response focuses in the main on climate change mitigation, for which we believe there to be significant gaps and weaknesses in existing guidance.
- 2.3 As it will clearly not be possible for the Guidance to address all these gaps and weaknesses by the end of August 2007, UK HECA hopes that the report will reference any further work and research that is already planned, as well as any further areas for research the Government believes will be necessary in future.
- 2.4 Whilst UK HECA believes that the Guidance is timely in respect of the urgency of the climate change challenge, the fact that it will be issued before the full details of the Comprehensive Spending Review (CSR), Local Area Agreement and the local government performance framework are known means that we believe it will be

essential that it is updated within a year, to reflect the developments within these frameworks and the subsequent implications for local authority activity.

- 2.5 Furthermore, to enable the Guidance to be updated and to be as useful and accessible as possible, UK HECA recommends that the Guidance is developed as a web-based tool.
- 2.6 Finally, UK HECA welcomes the fact that the Guidance will make clear 'the link with adaptation to climate change' and believes that similar guidance to local authorities on adaptation should be developed and made accessible via the web-based tool we have proposed.

3. UK HECA's response to specific questions in the consultation paper

Q1. *Are there other key areas of local authority activity, relevant to the scope of the report, that need to be covered?*

3.1 In respect of the areas of local authority activity already listed in the consultation paper, UK HECA believes there should be particular focus on the following issues:

- Land use planning – specific reference to Local Development Frameworks
- Building Control – enforcement and compliance will be an increasingly important issue for LAs once outcome-based CO₂ indicators are introduced in the performance framework
- Housing – Energy Performance Certificates and HHSRS
- Public sector estate management and procurement – this should include fleet management

3.2 Additional areas of local authority activity that UK HECA believes should be covered are:

- Development of corporate strategies and policies, for instance: Sustainable Community Strategies, Corporate Plans, Local Area Agreements
- Development and implementation of regeneration strategies
- Local authority finance, in particular the use of LA powers to borrow and trade
- Maximising household incomes, in view of the significance of incomes in the alleviation of fuel poverty
- Guidance on support for small and medium enterprises (SMEs) that fall outside of the Carbon Trust's remit
- Energy Performance in Buildings Directive requirements in non-domestic buildings, covering its policing, penalties and incentives

Q2. *Are there other existing sources of guidance that the report should reference? Where are the key gaps and weaknesses in existing guidance that this report could usefully fill?*

3.3 Further to the existing sources of guidance listed in the Consultation Paper, additional sources that UK HECA suggests are referenced are:

- The Local Authority Energy Day Toolkit, developed by the Energy Efficiency Partnership for Homes (EEPH) and UK HECA: <http://www.energysavingtrust.org.uk/housingbuildings/calculators/energyday/>
- The Beacon Council Tackling Fuel Poverty Toolkit, developed by National Energy Action (NEA) on behalf of the five Beacon Council Tackling Fuel Poverty authorities: http://www.nea.org.uk/Working_with.../Local_authorities/Affordable_warmth_beacon_toolkit
- The Home Energy Officers Network – Eastern (HEON-E) fuel poverty toolkit
- Financing Local Futures, Sustainable Development Commission (supported by CIPFA, the LGA and the IdeA): <http://www.sd-commission.org.uk/pages/financinglocalfutures.html>
- Prudential Code for Capital Finance in Local Authorities, CIPFA: http://www.cipfa.org.uk/PT/prudential_framework.cfm
- The UK Climate Impacts Programme (UKCIP) <http://www.ukcip.org.uk/default.asp>

3.4 In addition, there is a great deal of guidance available from the following organisations which could be reviewed for selective referencing:

- The Energy Saving Trust
- National Energy Action
- Energy Efficiency Partnership for Homes
- EAGA Charitable Trust

3.5 In respect of gaps and weaknesses, Government programmes and guidance have in recent years tended to focus on individual sectors (e.g. housing, transport etc), single issues (e.g. fuel poverty, climate change etc) and required authorities to measure performance on the basis of theoretical improvements, for instance the % improvement in domestic energy efficiency required by the Home Energy Conservation Act (1995). This has led to local authorities:

- Taking a single sector view, where there may be synergies in working cross-sectorally;
- Managing trade-offs between fuel poverty and climate change objectives;
- Prioritising activities (eg condensing boilers, cavity wall insulation) with the highest notional savings (ie that reduce energy consumption as modelled by energy rating software), whilst overlooking, firstly, the real outcomes of these activities in terms of *actual* reductions in CO₂ or the numbers of people lifted out of fuel poverty, which are of course influenced by *real world* issues such as design and installation quality, lifestyle choices and personal circumstances, and secondly, alternative approaches that may lead to equally cost-effective or even greater improvements in these outcomes

3.6 UK HECA believes that there are significant gaps and weaknesses in existing guidance relating to:

- Strategic and cross-cutting approaches to mitigating climate change across both local authorities' own functions and across their areas
- Local authority financing of climate change mitigation, in particular, the use of local authorities' own finance, the powers of well-being and powers to borrow and trade
- Information that local authorities can use to target activity to mitigate climate change and alleviate fuel poverty, *as well as* unambiguous guidance relating to data protection issues, particularly the ways in which such data may be accessed/used without contravening the DPA. Data on pension credit recipients and properties off the gas network would be particularly useful to LAs
- Making the most of our community leadership role

3.7 Key questions that UK HECA would therefore like the Guidance or further research to address are:

- Which mitigation activities are likely to lead to *actual* rather than merely notional carbon emission reductions across LA operations, functions and communities?
- What 'quick wins' can local authorities make on climate change mitigation, i.e. how can LAs achieve maximum reductions in CO₂ for minimum intervention?
- How can LAs add value beyond the activities of other organisations?
- How can LAs select which sectors they should focus on and to what degree?
- How can LAs develop synergies between their approaches and activities in different sectors?
- How can LAs achieve a balanced integration of fuel poverty and climate change mitigation objectives?
- What are the most effective marketing strategies, opportunities and messages for stimulating action on climate change by the people who live and work in our areas?

Q3. *Do you agree that tailored advice for different types of local authorities is needed? If so, how might the report approach the needs and perspectives of different types of local authority?*

3.8 UK HECA believes that there will be value in providing tailored guidance for different types of local authorities with different circumstances and opportunities. Specifically, we believe that the guidance could take account of the following:

- The type of authority (e.g. county, mets, London boroughs [including reference to inner/outer], English unitaries, Welsh unitaries, districts).
- Clear categorisation of sectors - e.g. local authority estate; other public sector estate; business and commercial sector (possibly broken down further e.g. retail, manufacturing); domestic sector; transport.
- Clear categorisation of the differing scenarios and opportunities that will exist within each of these sectors in each LA area (e.g. for housing, guidance relating to different tenure-mixes and age/built form profiles)
- Geographic factors such as by region, sub-region, urban/rural profile

Q4. *What key opportunities for joint working do we need to highlight in the report? Who are the key delivery partners on climate change and sustainable and affordable energy at a local and regional level?*

3.9 UK HECA believes that the key opportunities for joint working (and key partners) include:

- Partners that can help local authorities to finance climate change mitigation and affordable warmth: e.g. energy suppliers, EAGA Partnership, regional development agencies, business sector etc
- Partners that can help local authorities to co-ordinate actions across regions/sub-regions: e.g. regional government, regional development agencies, housing boards etc
- In-area partnerships and fora such as local strategic partnerships, business and landlord fora and community networks, comprising the council, health sector, energy sector, police and fire brigade, voluntary organisations
- National, regional and sub-regional local authority networks and fora, e.g. the Home Energy Conservation Association (UK HECA), local authority energy manager networks, LA21 networks etc
- Partners that can help LAs target and provide energy advice to specific local audiences - eg energy efficiency advice centres (sustainable energy centres), Energy Saving Trust, Carbon Trust
- Partners that can help target vulnerable households – eg Pension Service (especially visiting service), other DWP agencies, health service, third sector organisations
- Partners that can help the development of community-based approaches to climate change mitigation and fuel poverty

Q5. *Are there key issues that the report needs to address in the translation of climate change and sustainable energy and affordable energy goals into LAAs and similar agreements?*

3.10 The key issues that need to be addressed are clarification on the post-CPA indicators on climate change mitigation and fuel poverty, whether these will be mandatory for all LAAs, and the scope for local negotiation of the targets for these. As stated earlier in this response (2.4), the fact that the Guidance will be issued prior to the CSR suggests it will be unlikely that answers on these can be included in the Guidance, and makes it essential that the Guidance is updated and reissued within one year.

3.11 Nevertheless, it would be useful for the Guidance issued in August 2007 to highlight case studies of effective approaches to climate change mitigation and fuel poverty adopted by existing local strategic partnerships and local area agreements.

3.12 It would also be helpful if the Guidance could make clear the links between climate change and fuel poverty and common LAA agendas such as health and regeneration.

Q6. *Do you have any specific examples of successful case studies that could be included in the report? Or existing sources of good practice examples which could be referenced in the report?*

3.13 UK HECA runs an annual awards scheme for successful projects in each HECA region. Case studies and articles on these can be obtained from the UK HECA Secretariat – contact helen.atkins@ukheca.org.uk.

Q7. *How can the report help the most in reducing the up front resources local authorities have to commit in developing their approach to climate change and affordable and sustainable energy issues?*

- 3.14 The Guidance can help by being customised, user-friendly, accessible and updated annually; and by signposting LAs to agencies and partners that can provide ongoing support, particularly local authority support networks and fora. The Government could also consider developing seminars and workshops linked to the Guidance.
- 3.15 Fora and networks such as UK HECA can play a valuable role in supporting LA energy officers, particularly those who are new to the issues or whose authority may historically have provided limited leadership and support in this arena. UK HECA would therefore be very interested to explore with Government how it might be able to further help to reduce the up front resources required by local authorities in developing their approach to this agenda. UK HECA will of course be able to assist Government in the dissemination the Guidance once issued.

Q8. *How useful do you find this information or would national consumption data be sufficient?*

- 3.16 UK HECA believes that detailed electricity, gas, oil etc consumption data at local authority level will be very useful in helping LAs to prioritise and target their activities. UK HECA would particularly welcome the provision of this energy consumption data at postcode outcode level.
- 3.17 UK HECA also welcomes the proposal for the use of this data for monitoring the proposed indicator on % reduction of carbon emissions in LA communities. Firstly, this will institute a standard methodology that 95% of HECA Officers reported they wanted in research undertaken in 2004¹ (and will hopefully lead to the demise of the many varying and inconsistent reporting methods that a number of local authorities have adopted). Secondly, LAs will no longer be required to undertake themselves the onerous data collection of the type that was required under HECA, which will free up officers time to concentrate on activities rather than monitoring.

Q9. *Are there any other general points you want to make on the contents of the report?*

- 3.18 As it will clearly not be possible for the Energy Measures Report to address all gaps and weaknesses in existing guidance by the end of August 2007, it would be helpful if it could reference any further work and research that is already planned, as well as any further areas for research the Government believes will be necessary in future.

ENDS

¹ http://www.ukheca.org.uk/downloads/root/regions/uk/documents/heca_officers_views_final_report.doc