

UK HECA Response to DEFRA's Consultation on the Review of the Home Energy Conservation Act 1995

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 promote energy efficiency 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 Advisory Panel and the Scottish HECA Officers' Network as associate members. The regional chairs sit on the UK HECA Executive, which oversees the day-to-day running of the Association, supported by a dedicated Secretariat.

2. General comments

UK HECA welcomes the opportunity to respond to this highly significant consultation for our organisation and our members. UK HECA was an active participant in Defra's HECA Review; the Chair of UK HECA was interviewed as a stakeholder and 13 regional HECA fora representatives attended the two Review workshops.

Whilst this UK HECA response has been approved by our Executive, some HECA regions will be submitting their own response and these may vary from this collective position adopted by UK HECA.

To help inform our response, in December 2007 UK HECA developed an online questionnaire which was completed by 95 (25%) HECA Officers in England, Wales and Northern Ireland. A copy of the questionnaire is included in the appendix and a full copy of the analysis undertaken by New Perspectives will soon be available on request from the UK HECA Secretariat.

UK HECA believes that whilst HECA achieved a great deal in its early years in terms of increasing local authority leadership, partnerships and activities on domestic energy efficiency and fuel poverty (the latter particularly after 2000), the Act itself was flawed by the absence of: statutory targets, a standardised reporting format and auditing and verification of reports. UK HECA therefore agrees with the Government's view set out in the Consultation Paper that:

- Whilst HECA has played an important role in raising the importance of energy efficiency nationally, other national programmes have delivered the majority of the claimed energy savings (ECAs have though played a key role in helping to deliver these national programmes in their areas)
- The HECA reporting process is flawed and unlikely to drive the level of engagement in tackling climate change expected by Government

- Removing the annual HECA reporting requirement would give authorities additional flexibilities and resources to deliver carbon reductions across the entire community
- Retaining HECA alongside the new climate change indicators in the Comprehensive Area Assessment would lead to duplication in the performance management of LA action to tackle energy efficiency in the domestic sector

UK HECA is therefore supportive of the Government's preferred option to repeal HECA but **only** on the basis that the new local government performance framework ultimately imposes more rigorous requirements on local authorities, introduces smarter and more outcome-focused indicators and allows reliable comparisons to be made in terms of local authority performance.

In these respects, UK HECA believes that there is a grave danger that the new performance framework will fail to achieve the Government's objective for a significant increase in the level of engagement by local government in climate change and fuel poverty issues. This is due to the voluntary basis for the inclusion of the indicators in LAAs and some technical issues with the proposed definitions of the indicators, which we have summarised below (2.18 to 2.30). We therefore urge Government to:

- Consider improvements to the technical definitions of the indicators for climate change and in particular the fuel poverty indicator.
- Encourage all local authorities to include the climate change and fuel poverty indicators in their LAA.
- Monitor the extent to which LAs include these indicators in their LAA.
- Review whether there is need in future years to make it mandatory for these indicators to be included in LAAs.

UK HECA is also concerned that the role of the HECA Officer will be weakened by the repeal of HECA and that some authorities will use repeal as an opportunity to delete posts or parts of posts allocated to work on the Act. Should Government decide to repeal HECA, we would strongly urge Government to embark on a concerted campaign to raise the profile amongst local authorities of the work of HECA Officers and the role they can play in helping LAs to achieve progress against the new national indicators on climate change and fuel poverty. We also ask that Government facilitate and support a programme of training and events to help HECA Officers seize the opportunity to expand their role into the wider climate change and environmental sustainability arena.

UK HECA is currently working with the LGA to ensure that our network and set of skills is not dissipated, should HECA be repealed, and to capture the existing framework within the development of new structures and approaches. Both UK HECA and the LGA would welcome a meeting with Government to explore how this could be taken forward in a way that is beneficial to all parties.

Key findings of UK HECA's December 2007 survey

The UK HECA Secretariat conducted this survey by emailing all 379 HECA Officers in England, Wales and Northern Ireland a self-completion questionnaire (see Appendix). Some questions in this questionnaire (Q12 to Q15) were the same questions as Defra posed in the Review when inviting responses to the consultation. See section 3 below for the analysis of responses for these questions.

By 19th December, 2007 some 95 useable replies had been received by the UK HECA Secretariat - a 25% response rate which is quite good in the month leading up to Christmas. New Perspectives was commissioned to undertake detailed analysis of the responses.

Replies were received from HECA Officers in every region, but the South East was particularly well represented with over a quarter of the replies (26%) coming from this region. Almost two thirds of replies (61%) came from HECA Officers in District Councils. In terms of the amount of their working time they spend on HECA, the average amount of time spent was just over one third (36%), but this proportion varied widely – from 42% of HECA Officers who spent less than 10% of their time on HECA, to 19% who spent 76% or more of their time on HECA work. Around three quarters of the HECA Officer respondents had already spent at least two years in this post, but a quarter had spent less than two years in this role. The great majority of these HECA Officers (89%) had some other responsibilities apart from HECA; the more commonly mentioned additional duties were in housing (27%), other energy work (25%), grants or loans (23%), Fuel Poverty/Affordable Warmth (21%), and 17% who are already involved to some extent in climate change strategy or work.

The survey showed that only a bare majority (53%) of all HECA Officers may support the repeal of HECA, and the margins of error on the estimate based on only a 25% sample of the total make this uncertain (see table 1 below).

Table 1: HECA Officers' prefe	erred options for the future of HECA
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Option	%
Repeal HECA	53%
Introduce a new standard methodology based on the average SAP	25%
Remove the reporting requirement from HECA	11%
Leave HECA to operate unchanged	7%
No reply	4%

The remaining 47% in the sample would seem to support the retention of HECA in some form. Support for the repeal of HECA is slightly higher among HECA Officers who spend less time on HECA, who have less experience, and who have the most junior positions (non managerial officers) in their local authorities. This suggests that for at least some of these respondents HECA may be an added burden which they would be glad to be rid of. Among officers who spend over half their time on HECA only just over a third support the repeal of HECA, and fewer than half of those HECA Officers with over 5 years experience in post support repeal. If this weight of experience and seniority among opponents of repeal is balanced against the bare majority in favour of repeal, then support for repeal is certainly not made overwhelmingly.

43% of HECA Officers responded that a repeal of HECA would 'weaken my current role', while only 9% reported that it would 'strengthen my current role'. The remaining 47% reported that repeal of HECA would 'neither strengthen or weaken my current role. The % of officers reporting that repeal would weaken their role increased significantly for those who spend more than 50% of their time on HECA.

In terms of the support HECA Officers would welcome during any transition from HECA to a wider climate change agenda, the following were listed by HECA Officers, in this order of popularity:

•	Training	71%
٠	Events (seminars, workshops)	64%
٠	Networks	48%
•	Mentoring	25%

Almost two thirds of HECA Officers (63%) favour retaining the UK HECA Network even if the Act itself is repealed. Although many others are uncertain about this at present (32% not sure), there are only a very few HECA Officers (5%) who feel that the UK HECA Network should not be retained. The second question on this subject asked: *"What should be the focus of UK HECA in future?"* and it offered four alternative choices. The two almost equally popular choices were:

- Widen our focus to include the domestic carbon footprint as a whole 40%
- Widen our focus to include all climate change issues 35%

Clearly there is very widespread support for the UK HECA Network to widen its remit to include either wider domestic carbon emissions, or all climate change issues. By comparison only a minority want keep the status quo or are unsure:

- Maintain the current focus on domestic energy efficiency and renewables 20%
- Not sure/no reply

Summary of UK HECA's response to the 'National Indicators for Local Authorities and Local Authority Partnerships: Handbook of Definitions Consultation'

As stated above, UK HECA has a number of reservations about the detailed definitions of the national indicators. UK HECA responded to the Government's Handbook of Definitions Consultation and believes that it is relevant to restate our key concerns here.

NI 185 CO₂ reduction from Local Authority operations

The definition is clear but the prescribed tool lacks any detailed guidance. This will lead to wide ranging assumptions/approaches and incomparable data across local authorities.

The design of the housing input worksheet is flawed – it only measures improvements arising from the filling of cavity walls. It does not capture savings from other traditional energy efficiency improvements such as loft/roof insulation, heating, solid wall insulation, floor insulation or double glazing, or savings arising from decentralised/renewable energy.

The collection of housing data is a duplication of information that will be collected nationally under NI 186.

UK HECA asks that Government issues comprehensive detailed guidance on how the tool should be used and omits 'the Input 3 – Housing' worksheet.

NI 186 Per capita reduction in CO₂ emissions in the LA area

UK HECA is supportive of this indicator as it is outcome-focused, will not require collection by the local authority (thereby freeing up resources to be directed at activities) and will allow authorities the flexibility to prioritise how to target savings in their area across sectors/issues. We are mindful however that the statistics being used are still 'experimental' and we will keep an eye on the extent to which data is improved in respect of accuracy and timeliness.

5%

UK HECA believes that the per capita element should be removed as this will lead to poor comparability across LAs due to variations in levels of business and visitor populations and long distance vehicle movements to other destinations.

NI 187 Tackling fuel poverty – people receiving income based benefits living in homes with a low energy

UK HECA believes that NI 187 indicator is an example of 'right issue/wrong approach'. Fuel poverty is an important and complex issue and local authorities are best placed to lead on coordinated approaches to its alleviation. However, there are a number of significant flaws with the proposed approach:

- Poor outcomes-focus it is a very poor proxy for fuel poverty as it relates to only 20% of fuel poor households.
- Excessive cost only 10.2% of dwellings nationally have with a SAP < 30 (EHCS Survey Report, 2005). A survey even at NHER enhanced Level 0 would cost at least £100 per dwelling. This approach would obviously cost an authority with 100,000 homes roughly £100,000 per annum. This money would be better spent on measures to tackle the problem. Furthermore, the sampling regime could result in 2/3rds of surveys being redundant according to the worked example (only 500 out of 1500 surveys would be useful for the prescribed purpose). Income data is difficult/costly to collect.
- Driving the wrong actions the indicator would only drive actions to improve homes < SAP 30 only 10.2% of homes nationally. There would be a perverse incentive for local authorities not to encourage take-up of benefits in their area.

UK HECA also believes that the technical definition of this indicator is unclear as it does not state how the SAP should be calculated. SAP can be calculated at various levels which affect cost and the level off accuracy, e.g. a full SAP assessment, a reduced 'RDSAP' assessment, or 'stock profiling' methods using NHER software at either 'NHER level 0' or enhanced 'NHER level 0'. Also, the collection method is ambiguous – does this indicator require new surveys specific for this purpose? How is Government expecting these to be carried out - using trained surveyors, self-completion surveys by households? Will a standardised format be developed?

UK HECA believes that this technical definition will not work in practice because it represents a significant additional resource and the survey would not yield much useful information. UK HECA instead believes that the following indicator should be adopted with <u>no</u> link to income-based benefits:

- the proportion of all dwellings below SAP65, and
- the proportion of all dwellings below SAP30

The rationale for this approach is that SAP65 is the best proxy available for affordable warmth and adding a lower threshold or floor SAP would encourage LAs to also focus on improving the worst properties. Over time, the lower threshold SAP target could be raised as the worst homes are improved.

The data should be collected at the national rather than at the local level. The data could be collected as part of an extended EHCS (the cost increase would still be cheaper to the public purse than requiring individual LA surveys) or via a national property database (using HEED, the fuel poverty database, EPC, LA data etc.)

This approach would be aligned with the Government's thinking behind its preferred option to repeal HECA and instead introduce NI 186 (per capita CO_2 emissions in whole area) as a more outcome-focused indicator, collected at the national level to free up LA resources to tackle the problem.

3. Specific comments on the questions posed in Defra's Consultation on the Review

Our December 2007 survey included the questions posed by Defra in its consultation paper and a summary of the responses to these is included here.

HECA Officers' views on whether HECA is meeting its objectives

The commonest type of comment (written by 34% of respondents) was that the *HECA* monitoring methods were flawed, not comparable inaccurate, a waste of time, made it impossible to tell if objectives were being met, or that defra should do all the monitoring. A few officers (4%) also felt that the HECA reporting methods ignore energy trends in homes/increases in electrical gadgets. These views reinforce the findings from the 2004 Survey of HECA Officers, and the views put forward at the defra HECA Workshops in late 2006/early 2007, that few people in ECAs set much store by whatever monitoring results they were getting, because they doubt the accuracy or comparability of the various monitoring methods being used. There is also some support for a defra-organised common monitoring method to be used in all areas so that truly comparable results are obtained.

On the plus side, almost as many respondents (31%) feel that *HECA has raised awareness/ profile/highlighted importance of energy efficiency in the Council/among Members.* This has proved an important role for HECA, as in its early days few Councils took much notice of the need to encourage improvements in the energy efficiency of the housing stock in their area.

Over one fifth of HECA Officers in this sample survey (21%) also believe that HECA has helped drive genuine improvements: *HECA drove change/projects/activities/led to action by Local Authorities/installations/education/it requires/made Local Authorities do something.* Some (15%) feel HECA has been valuable because it *helped develop Partnerships/ information exchange* and others (15%) that it *provided a focus for energy efficiency activities/helped us put a programme together.* A few mentioned other benefits in HECA: that the *requirement to report made LAs take action/raised the interest of members/allowed monitoring of progress* (8%); or that *HECA attracted investment/funding/resources/officer time* (6%); or that *HECA helped us achieve our target (30% saving)/some success in meeting targets/on course to meet targets/met objectives;* or that *HECA raised awareness in the community/helped us work in the community* (4%). All these roles for HECA have been valuable contributions to the development of new energy efficiency policies and activities in local authorities.

Rather fewer negative comments were made about the HECA programme in general. Only 17% of HECA Officers felt that HECA's impact had been *minimal/not very good/little help/limited success*, sometimes because of *inadequate resources/budget*. A few (6%) feel that *national*

targets were not met locally or doubt HECA has made significant savings, and a few (7%) feel that progress was mainly made by other schemes like EEC/Warm Front/Warm Zones.

HECA Officers' views on whether HECA promotes objectives in an effective and proportionate manner

The two most common answers were *No/not particularly/not any more/could be much better* (44%) and *Yes/Yes to some extent* (24%), both of which suggest that HECA has been of some use during the 12 years of its existence but that it is now seen as effective by only about a quarter of HECA Officers.

The two next most common comments addressed two of the points already raised in response to Q12: the reporting/monitoring is flawed/inconsistent/unreliable/has lost credibility/can't compare/it needs a common method in all areas (17%), and HECA doesn't make Local Authorities DO anything/just have to report/lacks mandatory (annual) targets/needs financial incentives (15%). There are also a number of minor criticisms of HECA, each mentioned by a few respondents (only points mentioned by at least two respondents are shown here):

- Other schemes EEC/Warm Front/Housing Renewal are now more effective than HECA (8%);
- It's too dependent on LAs dedicating resources/funds to HECA/many don't do so/some have reduced HECA staff (5%) or it depends on commitment/time/effort of HECA Officer/time spent on promotion (4%);
- It does not reflect the focus now on climate change/Fuel Poverty (4%);
- HECA needs an overhaul with massive investment/needs funding/mandatory targets/emphasis on higher management levels in LAs (4%);
- Social housing benefited more than private housing/not reaching Fuel Rich (4%);
- Lacks effectiveness because no specialist/statutory HECA Officer/no recognition of HECA Officer/make HECA Officer a statutory post (3%);
- No mixed messages/conflict between delivering energy saving and fighting Fuel Poverty (2%);
- Too focussed on Housing/not as all-encompassing as it should be/should cover Transport and Food Miles (2%);
- Reporting % improvement misleading when set against rising energy consumption (2%);
- Too much reliance on Warm Front causes problems/contractors overcharge/LAs have to/or can't top up (2%);
- Homeowners less aware of HECA/should be promoted more by Government (2%).

HECA is however defended by some minority views too:

- It's successful in promoting strategy/targets/importance of the issue/raising profile/ awareness in LA (11%);
- It helps/needs partnership with/or follow-up from EEC/Warm Front/EEACs/other LAs/UK HECA (5%);
- Annual Reporting does help/develops projects/reviews/helps make real savings (4%).
- Much expertise built up by HECA Officers do not jeopardise this (2%).

Whether HECA Officers support the findings of the HECA Review

Most HECA Officers (60%) replied Yes/yes on the whole/provisionally that they supported the findings of the HECA Review. A few (12%) added that HECA Reporting needs improving with a standard methodology.

Only a few HECA Officers dissented from these views, writing that they support the Review but not the repeal of HECA (11%), or that no/don't support it completely/only partially (4%). A few would only support the repeal of HECA if it were replaced with a more effective Act/don't accept that all improvements are due to EEC and Warm Front (2%) or suggest update the Act/HECA with statutory obligations/reporting evolved from HECA (1%).

HECA Officers' preferred options for the future of HECA

At Q15 respondents were asked which of Defra's alternative options they supported. The numbers of HECA Officers in this sample survey who supported each option were as follows:

٠	Repeal HECA	53%
•	Introduce a new standard methodology based on the average SAP	25%
•	Remove the reporting requirement from HECA	11%
•	Leave HECA to operate unchanged	7%
٠	No reply	4%

This suggests that a bare majority of all HECA Officers may support the repeal of HECA, but the margins of error on the estimate based on only a 24% sample of the total make this uncertain. The remaining 47% in our sample would seem to support the retention of HECA in some form, although 25% would support a new standardised monitoring methodology based on average SAP ratings; 11% would like the annual reporting requirement removed; and only 7% would support leaving HECA to operate unchanged.

We have analysed these responses by Region, LA Type, amount of time spent on HECA, length of time as a HECA Officer, level of the HECA Officer in the local authority; and energy-related qualifications. This was done to see if any particular groups of HECA Officers held widely differing views. But because of the small sizes of most of the sub-samples in this survey, there are few statistically significant differences between the sub-groups.

Support for leaving HECA to operate unchanged is however apparently highest in the North West Region, where 40% of the sample support this option.

Support for removing the reporting requirement from HECA is apparently stronger in Wales (where 67% support this), among HECA Officers who spend less than 10% of their time on HECA (18% support this option), among HECA Officers with 5 to 9 years experience (24% support), and among HECA Officers who are 4th tier managers (21% support).

Support for introducing a new standard (monitoring) methodology based on average SAP ratings is higher in East Pennines (60% support); it is popular among HECA Officers who spend 76% or more of their time on HECA (44%) or those who have been over 10 years in post as HECA Officer (43% support); it is also quite popular among HECA Officers who have some energy related qualifications (varying from 31% to 35% depending on qualification).

Support for the repeal of HECA is slightly higher among HECA Officers who spend less time on HECA, who have less experience, and who have the most junior positions (non managerial officers) in their local authorities. This suggests that for at least some of these respondents HECA may be an added burden which they would be glad to be rid of. Among officers who spend over half their time on HECA only just over a third support the repeal of HECA, and fewer than half of those HECA Officers with over 5 years experience in post support repeal.

ENDS

APPENDIX: QUESTIONNAIRE ON THE FUTURE OF HECA (DECEMBER 2007)

INTRODUCTION

The UK Home Energy Conservation Association (UK HECA) supports and represents local government officers responsible for home energy efficiency and 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 Advisory Panel and the Scottish HECA Officers' Network as associate members.

UK HECA is very keen to engage with its members in view of the changing local government policy framework in England relating to domestic energy efficiency. This questionnaire aims to gather HECA officers' views on:

- The Government's Consultation on the Review of the Home Energy Conservation Act 1995 (HECA) with its preferred option to repeal HECA.
- The future development of the UK HECA Network in view of the government's proposal to repeal HECA.
- The support required to help officers make the transition from HECA to the broader climate change and sustainability agenda.

While the Consultation on the Review of HECA focuses on English local authorities, each of the Devolved Administrations will be undertaking their own reviews of the HECA in each of their own countries and there are implications for how UK HECA operates in future. UK HECA therefore encourages responses to this questionnaire from all our members across the UK.

The results of this survey will be collated by the UK HECA Secretariat and will be used to inform UK HECA's response to the Government's Consultation on the HECA Review and our future development as a network. Your personal views and details will be held in confidence and not associated with you or your local authority. Thank you for your help.

* indicates required field

A. YOUR DETAILS AND BACKGROUND

- 1) Your Name:
- 2) Your Job Title:
- 3) Your Department:
- 4) *Your Local Authority:
- 5) Your HECA Region:
- 6) What % of your time do you spend on HECA?
- 7) How long have you been a HECA Officer?
 - a) Less than 1 year b) 1 to 2 years
 - c) 2 to 5 years d) 5 to 9 years
 - e) Over 10 years
- 8) Apart from HECA, what other responsibilities do you have (if any)?
- 9) Which of these best describes your level in your local authority?

- a) 1st tier manager (e.g. Director)
- b) 2nd tier manager (Asst. Director)
- c) 3rd tier manager (Head of Service)
- d) 4th tier manager (other Manager)

e) Other (what?)

- e) Non-managerial officer
- 10) What do you consider your professional specialism to be?
- 11) What energy-related educational/vocational qualifications do you have?
 - c) City & Guilds Energy Awareness
 - b) Postgraduate degree d) NHER auditing qualification

Degree subject(s): Please specify Other: Please specify

a) Undergraduate degree

None

B. THE GOVERNMENT'S REVIEW OF HECA, OCTOBER 2007

The following are questions included in the Government's Consultation paper: <u>http://www.defra.gov.uk/corporate/consult/heca/index.htm</u>

- 12) What has been your experience of the success of HECA in meeting its objectives?
- 13) Do you think HECA promotes the Government's domestic energy efficiency objectives in an effective and proportionate manner?
- 14) Do you support the findings of the HECA Review? Is there any additional information that Government should consider?
- 15) Which of the following options for the future of HECA set out in the Consultation Paper do you support?
 - a) Leave HECA to operate unchanged
 - b) Remove the reporting requirement from HECA
 - c) Introduce a new standard methodology based on the average SAP
 - d) Repeal HECA

C. FUTURE OF THE UK HECA OFFICER NETWORK

16) Do you think there is a need for the UK HECA network to continue should the Government's proposal to repeal the Act be adopted?

Yes

No

Not sure

17) What do you think should be the focus of UK HECA in future?

- a) Maintain the current focus on domestic energy efficiency and renewables?
- b) Widen our focus to include the domestic carbon footprint as a whole?
- c) Widen our focus further to include all climate change issues?
- d) Other? Please specify:

18) How do you rate the importance of the following current aims of UK HECA:

 Provide leadership and support for energy conservation authorities and the regional and devolved HECA fora.

1	2	3	4	5
Not very i	important	quite important		very important

b) Share information and good practice, eg via the HECA website, quarterly newsletters and the annual HECA Conference.

1	2	3	4	5
Not very imp	oortant	quite importa	nt	very important

c) Develop and support HECA officers' roles.

1	2	3	4	5
Not ver	y important	quite important		very important

d) Build partnerships between local authorities and other statutory, voluntary and private organisations in order to promote mutually beneficial schemes.

1	2	3	4	5
Not very	important	quite important		very important

e) Act as a voice for local government energy officers with central government and other relevant bodies on matters relating to policy and programme delivery.

1	2	3	4	5
Not very	important	quite important		very important

f) Act as a channel for Government and other relevant agencies to consult with local government energy officers on their energy policies and programmes.
1 2 3 4 5

Not very important	quite important	very important
, ,		

19) Are there any other aims that UK HECA should pursue? Please specify:

D. SUPPORT FOR YOUR ROLE

20) Do you believe that the Government's proposal to repeal HECA will strengthen or weaken *your* current role?

- a) Strengthen my current role
- b) Weaken my current role
- c) Neither strengthen or weaken my current role
- 21) Is there any support you would welcome to help you develop your role in view of the transition from HECA to the wider focus on climate change?
 - a) Training
 - b) Mentoring
 - c) Events (seminars, workshops)
 - d) Networks
 - e) Other? Please specify:

E. ANY OTHER COMMENTS

22) If you have any comments you'd like to make on anything else please add them in the field below.

The results of this survey will be collated by the UK HECA Secretariat and will be used to inform UK HECA's response to the Government's Consultation on the HECA Review and our future development as a network. Your personal views and details will be held in confidence and not associated with you or your local authority. Thank you for your help.

To indicate your agreement to this check this box

If you have any queries about this survey please telephone the UK HECA Secretariat on 0116 299 5133.