

## Introductory Questions

- Malvern Hills District Council
- District Council
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## Headline and Overview

1. Does your Local Authority have a current strategy on carbon reduction and/or energy efficiency for domestic or non-domestic properties?  
If yes, please provide a link. If no, are you planning to develop one
2. What scheme(s) is your Local Authority planning to implement in support of energy saving/carbon reduction in residential accommodation properties in the next two years?
3. What has been, or will be, the cost(s) of running and administering the scheme(s), such as the value of grants and other support made available, plus any other costs incurred (such as administration) as desired.
4. What businesses, charities, third sector organisations or other stakeholders do you work with to deliver the scheme(s)?
5. What has been, or will be, the outcome of the scheme(s)? These outcomes could include energy savings, carbon savings, economic impacts such as job creation and/or increased business competitiveness or societal impacts such as alleviation of fuel poverty and/or improved health outcomes etc.

1. Malvern Hills declared a climate emergency in July 2019 aiming to become carbon neutral by 2050 with a minimum 50% reduction by 2030. Destination Zero: Creating a greener, more sustainable Malvern Hills District Council sets out an ambitious action plan as Council's first stage in commitment to reduce carbon emissions to net zero.

[Destination Zero.pdf \(malvernhills.gov.uk\)](#)

The council have recently recruited a shared Carbon Reduction Officer with Wychavon who will be looking at a series of key actions including wider carbon literacy training across the council's staff.

2. Malvern Hills District Council is currently delivering the Green Homes Grant Local Authority Delivery Phase 1A (GHG LADS 1A) in a consortium of Local Authorities in Worcestershire. We also have a statement of intent to facilitate ECO3 LA Flex for eligible residents in the district. Further details on these schemes are outlined separately below.

GHG LADs Phase 1a - £ 124,250 Government Grant for delivery and Administration Costs

GHG LADs Phase 2 – allocation of £ of which administration costs are 9% the MEH have funded the customer journey support element of the programme.

ECO Flex – delivered through our wider SLA with Act on Energy who check the eligibility of householders and measure suitability.

4. Malvern Hills District Council work with Act on Energy to deliver the Council's energy advice and information service to residents. When residents contact Act on energy their circumstances are assessed and are then sign posted to the most appropriate support available, whether it be for grants for physical intervention measures, emergency heating, information, advice, and guidance. The Charity also signpost and support with income maximisation and priority service registers. Act on Energy also work across the wider county to delivery fuel voucher scheme where they have accessed funding through EST redress and the county council winter COVID support fund where they have provided wider debt support for energy, alongside emergency heating, and heating repair funding for residents.

Other Charity and third sector organisations the Council work with include:

- ALEO Midlands
- CAB
- Age UK
- Community First

Between July 2019 and April 2021, 404 advice and information calls were taken by Act on Energy and the Council. This will have enabled residents to save money on their energy bills by supporting them out of fuel debt, supporting residents to access cheaper energy tariffs, advising on most efficient use of heating systems and signposting to fuel payment support. We provided advice at events to over 200 residents this was unfortunately curtailed due to the pandemic.

Worcestershire Local Authorities in partnership with Act on Energy delivered a fuel voucher scheme as part of a Covid crisis funding. This support assisted with payment of fuel bills and fuel debt because of the covid 19 pandemic. In Worcestershire 998 households applied for assistance through the scheme with a total funding of £62,744. Of this total funding £10,000 provided support to fuel bills to over 160 households.

## **Communications**

1. Does your Local Authority provide any advisory services to customers on how to save energy?  
If yes, please briefly outline how this is undertaken.
2. How do you communicate or encourage energy saving amongst domestic consumers and/or local businesses?

Act on Energy is a local energy charity that has over 22 years' experience of providing energy advice. We fund Act on Energy to deliver and administer our domestic energy saving schemes and run the Council's energy advice and information service.

This service provides a comprehensive and impartial energy efficiency advice service to the residents through a freephone telephone number. When residents contact Act on Energy their circumstances are assessed and are then sign posted to the most appropriate support available, whether this be a grant for energy efficiency measures, emergency heating, advice and information or a referral to another agency for ongoing support such as income maximisation or the Priority Services Register.

Act on Energy also work with in the community to raise awareness of fuel poverty and raise the profile of the net zero agenda through presentations and training sessions to local groups.

In addition, Act on Energy provide a local community outreach programme, Heat for Health, promoting energy advice and energy efficiency measures within the community linking with local health professionals providing local awareness campaigns, training, advice, and home visits. This ensures that the links to housing and health are made by health care professionals, and they can refer patients directly into the service or via social subscribing.

Act on Energy provide the secretariat services for ALEO national, and Midlands and we find this a useful way to feed into consultations and to network with other LA's

**Local Green Supply Chain –**

1. Have you made any assessment, or undertaken any analysis of the existing capacity in your local energy efficiency retrofit supply chain to support the decarbonisation of buildings by 2050? If Yes, please summarise the outcomes.
2. What actions are you taking, if any, to upskill and/or grow the local energy efficiency installer supply chain? This could include the facilitation of training, and local installer networking opportunities.
3. What actions are you taking, if any, to promote energy efficiency and the installer supply chain to consumers, and encourage households to consider energy retrofit?
4. If no action is taking place in either of these two areas, please let us know of any barriers you have encountered.
5. How effectively is your LA able to engage (Trustmark/PAS2035/PAS2030 certified) installers?
6. Do you have any plans to develop policies or initiatives in this space over the next five years as part of supporting your local decarbonisation efforts?

1. The Worcestershire LEP along with partners at the Midlands Energy Hub have undertaken an assessment of Low Carbon Environmental Services and Goods. This highlights the low carbon sectors across the district and the county.
2. We are working with our LEP partners on this agenda, and it forms a part of Worcestershire's Energy Strategy to assess and look at ways to grow the low carbon economy across the county.
3. Through our partner Act on Energy, eligible residents are offered support through one of the various grant schemes available. Act on Energy also work closely with front line members of staff to provide training to them on fuel poverty issues and to encourage referrals to our schemes. Between July 2019 and March 2020, 34 front line staff were trained by Act on Energy.  
  
Act on Energy a dedicated website describing the various grants, advice and support available for residents, including an installer network. Act on Energy work with local contractors for physical intervention scheme to install measures and promotion national and local grants.
4. The past year has been a challenging time to promote energy efficiency installs in homes due to the Covid-19 pandemic. Residents have understandably been reluctant to allow people in their homes especially with vulnerable households often requiring assistance. This has therefore led to reduced numbers of households applying for physical measures.
5. Malvern Hills District Council is working closely with its delivery partner, Act on Energy, to deliver retrofit programmes in the District through the GHG LAD scheme and have a network of approved installers they work with who work to certified standards.

**Social Housing**

1. What action, if any, has your LA taken to install energy efficiency or low carbon heat measures in social housing? Have these been installed to a satisfactory quality? What actions (if any) have your social housing partners taken?
2. Do you have easy access to the information/knowledge within your organisation that you would expect to need for social housing retrofit projects? (e.g., stock condition; property data; approach to procurement; alignment with existing internal maintenance/upgrade plans; tenant engagement and management plans; costings)  
If no, would it be easy/difficult to obtain this information?
3. Have you experienced any challenges to retrofit, including during any previous government schemes you have taken part in (e.g., supply chain, funding, tenant cooperation, mixed tenure, split incentive, policy clarity, etc)? Please provide some detail. Have social housing partners reported any challenges to retrofit?
4. How does your LA currently/how will your LA in future to go about identifying suitable housing stock and measures for retrofit? How do social housing partners identify suitable stock? By the same measures or via a different method?
5. What considerations would make you more or less likely to apply for government funding? If known, what is the opinion of your social housing partners?
6. To what extent are social housing tenants willing or unwilling to undergo retrofit, and what are the barriers and facilitators to their participation? If known, is this the same opinion across all social housing tenants or is it different with HA and ALMO tenants?
7. Does the approach to retrofit change for leaseholders in mixed tenure blocks? What encourages them to co-operate?

1. The social stock across the district is predominantly owned by Platform Housing. They have for many years been addressing the energy efficiency of their housing stock. They have delivered a plethora of programmes including an extensive EWI programme. Platform are currently engaged with both LADS1a and 1b programmes to help fund retrofit works across their stock. This includes a mix of measures from EWI, high retention night storage heaters, PV, ASHP etc.
2. Platform's Asset Management Team have a good knowledge base of their stock and have a programme of works to help address the energy efficiency of the stock. The challenge as for many RSLs is the cost implications of whole house retrofit. With the current LADs cap at £5000 this makes some of the most costly measures challenging.
3. Delivering programmes throughout the pandemic has been challenging with tenants understandably cautious about allowing works to be undertaken in their homes. With restriction lifting tenants are becoming more confident in allowing works to take place. Some residents are concerned about some technologies that we are looking to install. They are particularly unsure about ASHP and require additional and ongoing support which can add to the ongoing costs.
4. The council current way of identifying stock that might be suitable is use of the EPC register and stock condition survey data. Social housing providers have a better knowledge of their

stock as they have greater levels of both EPC data but also works delivered across the stock.

5. Having the staff to continually bid for funding when capacity is already tight is a challenge as is the stop start element of the funding. We would welcome allocations of funding over a longer-term period so we can plan and develop energy efficiency programmes that benefit residents and help achieve the UK's wider carbon goals.
6. We are still working to ascertain tenants' opinions on this as over the last 12 months refusals of work have been down to covid. Tenants are certainly cautious about the unknown and potentially must leave a property when works are undertaken. There are certainly concerns about bills increasing and particularly with vulnerable residents who have concerns about not being able to achieve their heat requirements in an affordable way.
7. This is unknown at this time for retrofit we are aware that it has been difficult in the past to deliver ECO and previous schemes across mixed tenure. There does need to be some work on shared procurement with RP's and LA's.

#### **Domestic Private Rented Sector (PRS) Minimum Energy Efficiency Standards**

1. Is your authority aware of the PRS Minimum Efficiency Standards regulations requiring private rentals in England and Wales to meet a minimum energy performance rating of EPC Band E as of April 2020, unless a valid exemption applies?
2. Which team within your authority is responsible for, leading on enforcement of the PRS minimum standard? Please provide the contact details of the person leading this team.
3. What method or methods does your authority use to communicate with landlords and tenants about the standards and other related issues?
4. What barriers, if any, does your local authority face enforcing these regulations (e.g., identifying non-compliant properties/landlords, budgeting/resourcing, any legal issues)?
5. Do you directly target landlords of EPC F and G rated properties to enforce these regulations? If yes, how? If no, please explain.

1. Yes, we are aware of the MEES in the PRS. We have received regular updates from ALEO on this.
2. The housing team within the council are looking to work together with other districts and trading standards and utilise the guidance that BEIS will develop through its current pilots to develop cohesive approach to enforcement of MEES.  
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3. The council uses newsletter and has run for many years a highly successful landlords forum to provide landlords with the latest policy updates and provides opportunities to feed into council plans.

4. The council's largest challenge in enforcing the regulations would be budget to do so.
5. We currently do not have the capacity to target F and G rated properties. We are looking at direct mailing to E, F and G rated properties highlighting the MEES and what support is available.

### **Financial Support for Energy Efficiency**

Where possible, please set out your answers to the following questions by tenure (owner occupied, privately rented, or social housing).

- 11 What financial programmes, if any, do you have to promote domestic energy efficiency or energy saving? If applicable please outline the budget (and % of the budget that is used), where such funding is sourced and where it is targeted.
- 12 What future investment for energy efficiency or low carbon heat measures do you have planned, and when are these investments planned for?

Green Home Grant Local Authority Delivery schemes promote energy efficiency grants for physical measures accompanied with advice on how to use these effectively. These have been outlined above. As a rural district we are also keen to understand how HUGS could support our off-gas communities.

We did have our own small pot of funding £30,000 to assist low income and vulnerable households who are without heating. Home Repairs Assistance Fund.

We also ensure that we help residents access ECO through our energy efficiency partners, Act on Energy.

Malvern Hills District Council will continue to actively apply for funding from a range of sources to support residents to continue to improve the energy efficiency of their homes. We will also continue to work closely with RPs and in partnership devise mixed tenure schemes. With long term funding through LADS, HUGS and SHDF we hope to achieve long term outcomes for both carbon reduction and reductions in fuel poverty.

### **Fuel Poverty**

1. Does your Local Authority have a Fuel Poverty Strategy?
2. What steps have you taken to identify residents/properties in fuel poverty? What blockers, if any, have there been in identifying households in fuel poverty?
3. How does fuel poverty interlink with your local authority's overall Carbon Reduction Strategy?
4. Please highlight any fuel poverty issues specific to your area.
5. What measures or initiatives have you taken to promote fuel cost reduction for those in fuel poverty? Include information on partnerships with local businesses or energy providers you have.

1. Fuel poverty is embedded within several key documents including the Council's, climate change ambitions, and wider countywide housing partnership plan

The Council is also a partner of the Warmer Worcestershire Fuel Poverty Plan. Which is supported through public health and feeds into the aim and objectives of the health and Wellbeing Board and takes into consideration the work of the Joint Strategic Needs Assessment (JSNA). The plan is a 5 year one that commenced in 2016 and is reviewed on annual basis to ensure that it supports the delivery and works alongside the cold weather plan.

The council is partner of the LEP Energy Strategy which also has fuel poverty as one of its key priorities along with carbon reduction and increased renewable energy generation across the county.

1. Fuel poverty has in the past used the BEIS statistics to target LSOA with high levels of fuel poverty. Throughout the pandemic this has changed and the number of residents asking for energy support has changed. We believe being able to visit a resident in their home is the best way to fully assess their situation and enable a suite of service to be provided both energies related and wider service provision.
2. Fuel poverty is part of a wider sustainability strategy so that we can assess and deliver appropriate outcomes in a staged process so that householders in fuel poverty are not impacted by any carbon reduction programmes
3. We are a rural district with an ageing population living in an older housing stock with residents living off the gas grid and heating provided by oil or LPG. This presents a unique opportunity for retrofit but does require significant investment to ensure a fabric first approach runs along side and changes to heating fuels.
4. We utilise our energy advice partners Act on Energy who can access both energy suppliers ECO and local contractors to deliver our energy efficiency works and support vulnerable residents in our communities. We have, as described earlier, accessed funding through GHG LADs and will continue to develop this programme for LADs 3 and work with partners on delivery of the ECO4.



### **Green Homes Grant Local Authority Delivery**

Of the £2bn Green Homes Grant scheme introduced in summer 2020, £500m was assigned for Local Authority Delivery (LAD). LAD enables Local Authorities to bid for grant funding to support low-income households in their area with energy efficiency and low carbon heating upgrades. £200m was made available through Local Authority grant competitions in 2020, known as phases 1A and 1B and £300m was allocated under Phase 2 between the five regional Local Energy Hubs.

1. Has your Local Authority Participated in GHG: LAD?

- If yes, please indicate which phase you participated in and briefly outline the project.
- If no, please indicate what barriers prevented you from participation in the scheme.

2. Would your Local Authority be able to manage the delivery of upgrades through a scheme such as LAD in 2022?

- If yes, please indicate the anticipated number of homes that could be upgraded per year.
- If no, please indicate what barriers would prevent you from delivering upgrades in your area.

1. Malvern Hills District Council bid for both GHG LAD Phase 1a through a consortium of local authorities in Worcestershire and in partnership with Act on Energy. Have identified 10 properties in several areas across Malvern. A review of EPC data has found solid wall with no insulation properties that will benefit from external wall insulation. The overall funding includes - £ 124,250 Government Grant for delivery and Administration Costs

2. We have accepted the allocation of funding for LADs 2 and are in the proposal development stage of the project. The biggest challenge for the delivery is supply chain capacity in both installers and surveyors. We are also aware that the £10,000 average for many measures is not adequate particularly if we are truly looking at a whole house fabric first approach to delivery.

### **The Energy Company Obligation (ECO)**

The Energy Company Obligation (ECO) is an obligation on energy suppliers aimed at helping households cut their energy bills and reduce carbon emissions by installing energy saving measures. Following the Spring 2018 consultation, the Government set out in its response that ECO3 will fully focus on Affordable Warmth – low income, vulnerable and fuel poor households.

The ECO “Local Authority flexible eligibility” (LA Flex) programme allows LAs to make declarations determining that certain households in fuel poverty or with occupants on low incomes and vulnerable to the effects of cold homes, are referred to ECO obligated suppliers for support under the Affordable Warmth element of ECO.

LAs involved in the LA Flex programme are required to issue a Statement of Intent 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.

1. Has your local authority published a Statement of Intent (Sol) for ECO flexibility/eligibility? (Y/N)

Please answer the following questions to help us to understand LA Flex delivery in more detail:

2. How many declarations were issued for low-income vulnerable households?
3. How many declarations were issued for Fuel Poor households?
4. How many declarations were issued for in-fill?
5. What is the highest income cap published in your Sol?
6. If you have used an income over £30k gross, what reason have you given?
7. Do you charge for declarations to be signed? If so, please state how much?

We deliver ECO Flex through a countywide SOI with the six other district councils and the county council along with our trusted and impartial partner Act on Energy who assess each case individually to ensure the need and eligibility of the resident. Referrals for the scheme come through our promotional work and through trusted partners.

We signed declarations for 276 households in Worcestershire during the last two years.

The cap on income for our SOI is set at £33,129 which is based on a household income below the Worcestershire median of £33,129 (gross) per annum. This cap come with other criteria for example off the main gas network, having a health condition exacerbated by a cold home. The SOL can view at [https://www.worcestershire.gov.uk/downloads/file/11541/statement\\_of\\_intent\\_april\\_2019](https://www.worcestershire.gov.uk/downloads/file/11541/statement_of_intent_april_2019)

Our partners Act on Energy check for eligibility of the resident and ensure both householder eligibility and compliance. They also endeavour to ensure that the measures are appropriate to the property. We fund them to deliver our wider energy efficiency work and they charge a small administration fee of £15 which currently does not cover the cost of the administration of a declaration. Which currently in real terms is between £25 and £50 per household dependant on the complexity of the case and measures required this excludes any home visit cost that may be required.

### **Smart Metering**

1. Please provide a brief statement outlining your current or planned approach to promote smart meter take up and supporting residents to achieve benefits.
2. Please provide further information on activities relating to smart metering, including but not limited to:
  - a. Integrating approaches to delivering energy efficiency improvements in residential accommodation
  - b. Arranging for smart meters to be installed by energy suppliers in vacant social housing premises
  - c. Using social landlords to promote smart meter uptake
  - d. Including smart meters in landlord licencing schemes
  - e. Supporting residents who have had appliances condemned for safety reasons
  - f. Other supporting activities

Smart metering advice is part of the suite of advice provided by our partners Act on Energy. They provide switching and tariff advice and embedded as part of this work. They are also a part of the BESN training programme which includes switching and smart meters. They provided training over the last two years in over 300 staff on this subject alone.

Our partners Act on Energy are also looking at the impact on metering and energy in the homes of those with dementia and encourage the installation of Smart Meter as part of the wider advice and support.

### **Future Schemes and Wider Incentives**

- Please outline any further schemes or wider initiatives not covered above that your local authority has carried out or is planning to undertake to improve energy efficiency in residential accommodation.

We work on several partner schemes with other councils including the county council. We support several their programmes such as the Warm Homes Fund First Time Central Heating Scheme.

We also provided support to several business programme run by the county, such as Business Energy Efficiency Programme (BEEP) and we also sit on the board of the county wide Public Sector Energy Efficiency Programme (PEEP).

