

Home Energy Conservation Act 2021-23 Report

1. INTRODUCTION

The Home Energy Conservation Act 1995 (HECA) requires all local authorities in England to submit reports to the Secretary of State demonstrating what energy conservation measures we have adopted to improve the energy efficiency of residential accommodation within our area.

This covers measures to improve properties in the owner-occupier, private rented sector, and social rented sector. The Department for Business, Energy and Industrial Strategy (BEIS) uses data submitted through these returns to inform policy thinking on energy efficiency, and to build an ongoing picture of local and national energy efficiency policy delivery.

In line with the government's guidance for local authorities (<https://www.gov.uk/government/publications/guidance-to-english-energy-conservation-authorities-the-home-energy-conservation-act-1995>) we are required to submit our HECA report via a dedicated upload platform, and publish our report online.

Section 2 below shows the responses that Harrogate Borough Council submitted to BEIS in 2021. The next reporting date is expected to be 2023.

2. HECA REPORT SUBMISSION 2021

1) Introductory Questions
Name of Local Authority Harrogate Borough Council
Type of Local Authority District Council

2) Headline and Overview
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 https://www.harrogate.gov.uk/environment/carbon-reduction-strategy
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?

Private sector insulation grants using LAD1B and LAD2 funding, targeting around 200 properties in Harrogate District in 2021.

We will also be seeking to apply for further funding under the Sustainable Warmth scheme.

Where applicable, we use discretionary assistance from our Disabled Facilities Grant budget for energy efficiency improvements for eligible households.

Ongoing investment in the energy efficiency fabric of council housing.

We are investigating implementing a collective tariff switching scheme in partnership the Harrogate District Climate Change Coalition

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.

Warm Homes Fund: Value of grants is £3,517 per property owner occupied homes, £2,518 per property for private rental and £1,150 for social housing properties.

LAD1B: Grants up to an average of £5k for landlords and £10k for owner occupiers.

LAD2: Grants up to an average of £5k for private landlords and social housing; and up to £10k average for owner occupiers.

Staff management and administration costs are not calculated separately, although the council contributes to a joint energy project manager post with partner local authorities.

What businesses, charities, third sector organisations or other stakeholders do you work with to deliver the scheme(s)?

We have a partnership arrangement with 3 other Local Authorities: York, Craven and Selby, to deliver energy efficiency grant schemes together in order to pool resources and make joint funding bids.

Our principal contractor for private sector schemes is Engie Regeneration Ltd, who deliver our Better Homes Yorkshire Scheme, they subcontract to specialist installers: Scarbrook Heating, Eclipse Energy North Ltd (Room in Roof Insulation) and Heat Insulation Ltd (Loft Insulation, CWI and draft proofing).

We work with a range of third sector stakeholders including: Harrogate District Climate Change Coalition, Warm and Well North Yorkshire, Age UK, Citizens Advice, Yorkshire Energy Doctor, Groundwork/ Green Doctors.

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.

Health impacts: cold homes have a significant impact on health particularly of older people, so where we are installing measures this should be improving health outcomes.

We have provided detailed outcomes in both in our LAD 1B and LAD 2 submissions, as part of the above consortium) outlining expected energy savings, carbon savings and economic impacts.

3) Communications

Does your Local Authority provide any advisory services to customers on how to save energy?

For private sector residents we do not have a dedicated advice service, other than advice in response to ad hoc customer enquirers.

For council tenants, we have a dedicated energy advisor.

How do you communicate or encourage energy saving amongst domestic consumers and/or local businesses?

We have a marketing and communication plan to deliver our LAD 1B and 2 schemes using the Better Homes Framework. It uses a mixture of approaches including:

- 1) General awareness campaigns, leaflets, posters and social media
- 2) Targeted - letters, door knocking by supply chain partners to encourage take up in specific areas
- 3) Use of trusted organisations such as community groups, third sector organisations Age UK, Citizen Advice, York Older Person Advocacy Services and Warm and Well
- 4) Promotion through statutory organisations including Housing, Adult Social Care, NHS York Community Energy

For measures not covered by the LAD 1b and 2 Better Homes Schemes such as EWI or windows we advise customers to find TrustMark accredited installers using the TrustMark website.

The council also convened the independent Harrogate District Climate Change Coalition of private and public sector organisations and third sector organisations, which has developed a list of action including promoting domestic energy efficiency.

4) Local Green Supply Chain

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.

This has not been specifically done for the Harrogate District but the York and North Yorkshire LEP's Labour Market Analysis 2021 has highlighted that construction remains a sector with predicted growth and one that suffers most from supply shortages of skilled individuals, particularly within higher skilled trades, which are relevant to the retrofit supply chain.

Harrogate College is a member of the Harrogate District Climate Change Coalition and are engaging with the local supply regarding training needs.

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.

The York and North Yorkshire LEP continue to work with colleges in the area to push for more promotion of retrofit skills within their existing and emerging programmes.

There is a proposal into the North Yorkshire County Council Community Renewal Fund to provide targeted low carbon construction skills in a practical environment in Scarborough (e.g. Level 3 Solar installation, Level 2 understanding domestic retrofit, NOCN level in understanding insulation and building treatment measures). Harrogate College have recently submitted a DfE bid to fund retrofit training at the college, which could support those seeking training in York.

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?

We do not currently provide a general energy advice service, instead we signpost private sector householders to other organisations such as Simple Energy Advice and Energy Saving Trust websites. Information is also available on the council's website, and via our social media channels and with our partners the Harrogate District Climate Change Coalition. Energy advice is available for council tenants, via a dedicated officer.

The York and North Yorkshire LEP have promoted available energy efficiency training (e.g. with Retrofit Academy) with their intermediaries network, via newsletters and social media whenever available.

If no action is taking place in either of these two areas, please let us know of any barriers you have encountered.

Lack of consistent and sufficient funding for retrofit energy efficiency measures has been a barrier. Without adequate resources the council is not in a position to build consumer confidence to take up the measures and confidence in the supply chain to invest in the necessary skills and knowledge. Short term investment both will drive up prices as there is too much demand and will prevent residents making the essential changes.

Numbers of properties and retrofit targets need to be defined before we can do an assessment of supply chain.

How effectively is your LA able to engage (Trustmark/PAS2035/PAS2030 certified) installers?

Our main contractor for our private sector retrofit schemes has all these certifications and we were able to get specialist installers on-board which have these accreditations.

However none of these contractors are based in Harrogate, they are all based in the wider Yorkshire region.

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?

Yes, our carbon reduction strategy is regularly reviewed and updated to reflect changing circumstances and policies, and it reflects the current availability of funding.

5) Social Housing

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?

We have carried out a range of actions to lower the carbon footprint of the social housing over many years. Projects have included installing 'A' rated gas boilers, 239 air source, 91 ground source heat pumps and 232 solar panels.

The council also invests in the fabric of council housing, by using cavity insulation, adding double glazing and loft insulation, in order to improve efficiency and raise the EPC label of the housing stock.

1,271 (35%) of our council housing stock has a current EPC certificate, and this number is increasing. 96% of our EPC ratings are D or higher, with the majority of those rated A B or C.

Harrogate Borough Council is the stock owner, so there are no housing partners for council housing stock.

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)

Yes we have access to the information and knowledge of retrofit via our housing stock management software, which gives a real time view of the status of the housing stock.

Staff have knowledge and experience with retrofit, with in-house expertise, this makes the process easy to manage.

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?

There are two main challenges that we have struggled with in past funding schemes for retrofit energy efficiency and microgeneration works.

The first is timescales, which tend to be short, in that specific details (sufficient for scheme design) of what types of work might qualify and under what conditions/requirements are often released some time after the generic announcement of a proposed scheme, with a requirement to have spent the granted monies within a very short timescale for typically complex, construction-market related projects.

The lengthening of a scheme-design/grant application period after publication of the full, detailed scheme requirements would allow housing providers to measure the gains available through the grant against their existing asset maintenance plans, and develop schemes that work sympathetically with an established direction of travel on climate change and retrofit.

Short timescales for scheme development and implementation increase the risks of measures being fitted in buildings in a manner that has not been fully considered and understood within the wider context of retrofit research and development, as a function of a 'rush for the cash' incentive.

Delivery at speed also increases risk of works being carried out without adequate quality control, leaving residents at risk of receiving poorly fitted and sometimes defective measures.

The second challenge is a frequent requirement for additionality, i.e. that the grant may only be provided for works that are not identified, programmed and funded within existing plans. We have, in the past, found ourselves in the position of having already put plans in place or begun qualifying works when grant funds are announced.

Schemes like the Renewable Heat Incentive, on the other hand, have been available for an extended period, as an incentive to 'green' the normal process of replacing heating systems at end-of-life and have not required a resource-hungry period of scheme design,

grant application and then (if grant is awarded) procurement ahead of trying to implement the scheme within tight timescales.

How does your LA currently/how will your LA in future plan 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?

We are currently working on a roadmap that describes the route to net zero carbon by 2038. This project is identifying the different types of properties and the possible measures and then selecting a bespoke solution for the big variety of buildings. The stock will be divided into archetypes and orientation so that there will be standard solutions for the same property.

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?

A key consideration would be a longer timescale both for applying and spending grant funding. A longer timescale allows for effective planning and make strategic decisions. Also the response time could be extended.

The funding at the moment has to be used on the extra measures. If funding is for the standard measures with the council responsible for the extra, the goals would be more achievable. When planning and saving for the measures, from the funding perspective we are punished by a lower grant than if there was an ad hoc plan with no savings from the council.

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?

Council tenants so far have been willing.

The council tries to be as less disruptive as possible whilst implementing the retrofit. We will also involve tenants during the process of making the net zero carbon roadmap. Giving them an option to come up with ideas and being actively involved. The council does not have ALMO tenants.

We have a dedicated tenants' energy advice officer who can discuss issues and assist tenants in making changes.

<p>6) Domestic Private Rented Sector (PRS) Minimum Energy Efficiency Standards</p>
<p>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?</p> <p>Yes</p>
<p>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.</p> <p>Private Sector Housing</p> <p>Private Sector Housing Manager Harrogate Borough Council PO Box 787 Harrogate HG1 9RW privatehousing@harrogate.gov.uk</p>
<p>What method or methods does your authority use to communicate with landlords and tenants about the standards and other related issues?</p> <p>Main communication channels:</p> <ul style="list-style-type: none"> • Email newsletters to landlords and letting agents • Website • Social media • Residents e-newsletter which has over 40,000 subscribers
<p>What barriers, if any, does your local authority face enforcing these regulations (e.g. identifying non-compliant properties/landlords, budgeting/resourcing, any legal issues)?</p> <p>Main barriers:</p> <ul style="list-style-type: none"> • Limited resources • Issues identifying non-compliant properties • Difficulty locating/making contact with landlords • Legislation has not been adopted and implemented by the local authority yet
<p>Do you directly target landlords of EPC F and G rated properties to enforce these regulations? If yes, how? If no, please explain</p>

No, we do not currently have the time or resources to do this so we have been unable to spend time identifying F & G rated properties. Our focusing is on working with and educating landlords when we come across F & G rated properties. For F& G rated properties they will have a hazard of excess cold under the HHSRS and we take enforcement action where necessary to address this hazard.

7) Financial Support for Energy Efficiency

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.

As outlined above we have worked with our consortium to secure funding from the LAD schemes, Warm Homes Fund, and predecessor schemes. The Warm Homes Fund scheme provided gas central heating for homes without gas central heating a number of vulnerable households.

What future investment for energy efficiency or low carbon heat measures do you have planned, and when are these investments planned for?

We have active schemes under LAD 1 and 2 for delivery in 2021-22. We anticipate bidding for future schemes via Sustainable Warmth.

8) Fuel Poverty

Does your Local Authority have a Fuel Poverty Strategy?

We do not have a separate fuel poverty strategy, but the issue is addressed in other strategies and action plans, such as the carbon reduction strategy and Home Energy Conservation Action Plan.

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?

We have used EPC data, Fuel Poverty data for LSOAs and Index of Multiple Deprivation data for LSOAs, to map the priority ward for fuel poverty interventions.

We plan to use some of our LAD 2 funding to refresh our evidence base and will be seeking to produce a retrofit strategy which will look to address where grant support is required to tackle fuel poverty.

How does fuel poverty interlink with your local authority's overall Carbon Reduction Strategy?

Domestic energy efficiency is a key part of the carbon reduction strategy, so the two areas of work are closely linked.

Residents who may be at risk of fuel poverty may also be the most vulnerable to the adverse effects of climate change. Groups such as older people, those living in low-income households, and social and private rented tenants may be less able to bounce back from flooding or other extreme weather events; and they have less influence in making necessary changes to their homes.

Our carbon reduction strategy highlights domestic energy efficiency as a priority and contains the specific action to provide grants or other support to improve home energy efficiency and reduce the risk of fuel poverty via the delivery of energy efficiency grant in target areas and potentially vulnerable residents.

The Harrogate District Climate Change Coalition has domestic energy efficiency as a priority area for action, and has a number of activities planned including a major awareness raising event, online advice and investigating the possibility of a collective energy tariff switching scheme. The coalition an independent body of public and private sector representatives originally convened by the council in 2019 to instigate carbon reduction activities and champion action to address the climate emergency.

Please highlight any fuel poverty issues specific to your area.

Key fuel poverty issues in the Harrogate District include:

- Domestic construction in urban centres where deprivation and fuel poverty tends to be highest. Many homes are of typically Victorian stone construction, they are hard to treat properties, including a prevalence of terraces and under insulated attic conversions.
- Large rural areas, off the gas network, leading to reliance on expensive fuels, coupled with unaffordability of renewable heating.
- Wide disparity between the most and least deprived LSOAs which can mask underlying fuel poverty issues in certain areas.

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.

Our active retrofit grant schemes are targeted at low income households.

We are currently investigating a collective tariff switching scheme, with the Harrogate District Climate Change Coalition.

9) 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.

Has your Local Authority Participated in GHG: LAD? If yes, please indicate which phase you participated in and briefly outline the project. o If no, please indicate what barriers prevented you from participation in the scheme

Yes, we are participating in LAD1B and LAD2. We were unable to participate in LAD1A owing to the bid timetable being too short, and insufficient time to gather data and draw up a project for delivery. Our contractor also did not have capacity to support a bid at the time.

The approved schemes are providing loft and cavity wall insulation and draught proofing measures, for eligible low income households with low EPC ratings.

Would your Local Authority be in a position 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.

Yes, we plan to bid for funding from government schemes in 2022 and have got capacity to deliver such funding. However, it is critical that new funding streams must follow seamlessly from LAD2 without a fallow period in between programmes.

Our project staff, shared with our consortium partners for LAD1B and LAD2 are funded through the revenue of these programmes, so funding need to be continued without breaks otherwise we risk losing the experienced and trained project staff.

Long term consistent funding is required to ensure that the supply chain has confidence to adequate train their staff. There is a significant shortage of experienced and knowledgeable EWI installers.

10) 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.

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

Yes, available here: <https://www.harrogate.gov.uk/downloads/file/126/eco-flexible-eligibility-statement-of-intent-version-two-redacted>

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

- How many declarations were issued for low income vulnerable households?
- How many declarations were issued for Fuel Poor households?
30
- How many declarations were issued for in-fill?
- What is the highest income cap published in your Sol?

Household income of £21,000 per year

- If you have used an income over £30k gross, what reason have you given?

N/A

- Do you charge for declarations to be signed? If so, please state how much?

No

11) Smart Metering

Please provide a brief statement outlining your current or planned approach to promote smart meter take up and supporting residents to achieve benefits.

Smart meter information is featured on the council's energy efficiency web page with a link to the Smart Energy GB campaign.

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 meters are installed in vacant council housing during void periods as a matter of course.

We have no plans to do further proactive promotion of smart meters, as resources are taken up delivering current grant programmes and planning for future funding.