

Local Authority Flexible Eligibility Statement of Intent

Local authority: Exeter City Council

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Introduction

Exeter City Council's Corporate Plan 2018 – 2021 focuses on three strategic programmes that address the current, major challenges facing the city. These are tackling congestion and accessibility, promoting active and healthy lifestyles and building great neighbourhoods.

Whilst Exeter is overall a healthy place to live some areas in the city have poorer health outcomes than others and whilst prosperity overall in the city has grown in recent years the health inequalities gap between the most and least well-off areas has increased in terms of health, employment and access to services. Exeter has populations that face social and financial exclusion, particularly in the six wards lying in the top 20% most deprived in the country. Some groups are at significant disadvantage and communities are unequal. The life expectancy at birth for residents in Topsham is over 86 years. This is more than 12 years greater than for those living in Sidwell Street where life expectancy is just 74.5 years. This is close to the maximum life expectancy inequality (16.7 years) between most and least deprived areas in England.

National data indicates that 11.5% of the city's total stock is in fuel poverty. This compares to 13.2% in Devon, 12.2% in the South West and 10.6% nationally. 6% of dwellings are likely to have an excess cold hazard with a further 11% having a risk of a cold hazard. The average SAP rating in the city is 61. Fuel Poverty can cause vulnerable and low income households to live in cold, unhealthy homes that are expensive to keep warm and increase levels of debt.

Under the Energy Company Obligation (ECO) 3 scheme, energy suppliers are able to achieve up to 25% of their Affordable Warmth obligation by installing energy saving measures in households declared as eligible by the Local Authority. Known as Flexible Eligibility (FE), the Local Authority can help those on a low income with a combination of either living in fuel poverty, or low income and whose vulnerability is exasperated by living in a cold home. Further details about Flexible Eligibility are set out in the [Government's Energy Company Obligation \(ECO\): Help to Heat consultation response document](#)

Exeter City Council welcomes the Flexible Eligibility (FE) powers for Energy Company Obligation (ECO) Affordable Warmth grant funding and intends to utilise it for the purposes of reducing fuel poverty in the city

for as many residents as possible. The FE scheme can focus on assisting local fuel poor residents, who don't qualify for funding through existing schemes, to install key energy measures. The council's existing grant and loan schemes, as detailed in the Financial Assistance Policy, can also be accessed by FE customers who have a shortfall in grant funding.

In identifying households as eligible under FE, Exeter City Council is seeking to enable residents to benefit from funding and will seek householder consent to include them in a Declaration of Eligibility. Exeter City Council expects any obligated energy supplier, or contractor working on their behalf, to comply with the General Data Protection Regulations, to fully follow Ofgem requirements for the Energy Company Obligation Help to Heat, and to act in accordance with industry best practice in relation to consumer care and quality standards of any works that may take place. These are covered in a separate Memorandum of Understanding between the Council and the obligated party.

It should be noted that the final decision on whether any individual household will benefit from energy saving improvements or heating rests with obligated energy suppliers or their contractors. Inclusion in a Declaration of Eligibility issued by the Council to a supplier will not guarantee installation of measures. The final decision will depend on i) identification of measures eligible under Help to Heat, ii) the supplier's assessment of the cost-effectiveness of installing measures in relation to achieving its obligation, and iii) whether the supplier has achieved their targets or require further measures to meet their Energy Company Obligation targets.

This Statement of Intent (SOI) sets out how households in the city of Exeter will be identified and declared to be eligible for energy efficiency measures under the current ECO 3 scheme.

Exeter City Council's Eligibility Criteria

Exeter City Council can only assist those living in the private sector (home owners and private tenants) who are:

- Living in fuel poverty e.g. low income and high costs OR
- Living on a low income and vulnerable to the effects of living in a cold home

Private renters who meet the above criteria and live in a property with an EPC Band F and G are only eligible for solid wall insulation and renewable heating measures. This is due a landlord's requirements to meet the Minimum Energy Efficiency Standards (MEES) in the private rented sector. Social housing is excluded from FE. These restrictions do not apply to properties with EPC Band E or above however replacement or repair of a broken heating system is not allowed.

A household must combine low income and high costs (i.e. fuel poverty) OR low income and vulnerable to the cold (LIVC) to be eligible. Therefore, a combination of high heating bills, low EPC ratings or vulnerability to the cold would not meet the requirements for a valid declaration if the low income threshold isn't met.

Low income households

Income is defined as a household's disposable income after they have paid for their rent or mortgage. The household income should include income from all sources, such as net earnings (after tax), income from savings and investments, pensions, all benefits (including housing benefit) and net council tax payments.

Exeter City Council determines the threshold for ‘low income households’ as:

Household composition	Annual household income	Monthly household income
Single adult	£9,790	£814
Single adult plus 1 child	£12,870	£1,078
Single adult plus 2 children	£15,840	£1,320
Single adult plus 3 children	£19,030	£1,580
Single adult plus 4 or more children	£22,110	£1,848
Couple	£16,060	£1,340
Couple plus 1 child	£19,140	£1,595
Couple plus 2 children	£22,220	£1,848
Couple plus 3 Children	£25,410	£2,123
Couple plus 4 or more children	£28,270	£2,354

High cost households

Energy Performance Certificate (EPC) bands can be used to identify how costly a household is to heat. Research indicates that E, F, or G rated homes have a high probability of being defined as ‘High Cost’ under the Fuel Poverty definition. Therefore, any household with on EPC Band rating E, F or G will be considered as High Cost households.

Low income and vulnerable to the effects of living in a cold home

Exeter City Council will target households who meet the low income household (LI) threshold AND with one or more individuals that are vulnerable to living in a cold home (VC). Based on the National Institute for Health and Care Excellence (NICE) guidelines conditions which increase vulnerability to cold include:

- i. Aged over 60 (55 in the case of mobile homes), and particularly those over 85
- ii. Children under 5 and pregnant mothers
- iii. Respiratory disease (COPD, asthma)
- iv. Cardiovascular disease (e.g. ischaemic heart disease, cerebrovascular disease)
- v. Moderate to severe mental illness (e.g. schizophrenia, bipolar disorder)
- vi. Dementia
- vii. Neurobiological and related diseases (e.g. fibromyalgia, ME)
- viii. Cancer
- ix. Limited mobility
- x. Haemoglobinopathies (sickle cell disease, thalassaemia)
- xi. Severe learning disabilities
- xii. Autoimmune and immunodeficiency diseases (e.g. lupus, MS, diabetes, HIV)

It is noted here that if a household meets the criteria for FP, there is no need to also meet LIVC, and vice versa. Households are not required to meet both FP and LIVC.

Park homes

All park home owners qualify regardless of low income or high cost household eligibility.

Solid Wall Insulation

To encourage and enable multi-property solid wall insulation, Exeter City Council can provide Eligibility Declarations for households that are not living in fuel poverty (FP) or living on a low income and are vulnerable to the effects of living in a cold home (LIVC). Known as 'in-fill' properties, if at least 50% of eligible households receive these measures, an adjacent property can also receive the same measure, as long as the number of these 'in-fill' properties does not exceed 50%. If a household doesn't meet the FP or LIVC criteria, Exeter City Council can declare a household as "in-fill" where they are:

- a) immediately adjacent building to; or
- b) in the same building as a household that does meet those criteria; or
- c) in the same terrace as; or
- d) back to back entire terraces, but only if the back of the actual properties are touching (not back to back garden/ alleyway separates the terrace).

Referrals

Exeter City Council expects referrals for Flexible Eligibility may come from:

- Self-referrals from residents
- Other Council departments
- Social care or health organisations
- ECO providers, installers or agents
- Use of Home Analytics' database
- Analysing EPC data
- Citizens Advice
- Exeter Community Energy
- Social prescribing organisations (who determine those that may be vulnerable or those with health conditions)
- Eligible households will also be identified through routine inspections
- Private tenants and private homeowners will be identified and referred to the scheme.
- Low income households living in energy inefficient housing will be identified in the private rented sector through enforcement activity under the Housing Act 2004 and landlord associations/forums.

How will Exeter City Council identify households?

Exeter City Council will utilise the Energy Savings Trust Home Analytics Database to target fuel poor. The Database will also be used to target those in poor health once Health Data has been added, a project that is ongoing.

We will cross-reference data on income with data that we hold or can access on Energy Performance Certificates, prepayment meters, expenditure on fuel, housing type/age/condition and heating type.

Low income households living in energy inefficient housing will be identified in the private rented sector through intervention and enforcement activity under the Housing Act 2004.

Governance

The Private Sector Housing (PSH) team at Exeter City Council will liaise with residents and ECO providers to produce the required declaration forms. The Environmental Health and Licensing Manager (or any qualified person they elect to delegate to), will be responsible for signing local authority declarations on behalf of Exeter City Council.

Evidence, monitoring and reporting/

Anonymised data on the characteristics of households reached through FE will be reviewed.

The data above will include details of households assessed, how many were deemed eligible and ineligible, and how many received heating and insulation improvements.

Signature

A handwritten signature in black ink, appearing to read 'Jo Yelland', is positioned above the printed name and title.

Jo Yelland
Director