

Energy Company Obligation 2018-22

Local Authority Flexible Eligibility Statement of Intent

City of Wakefield Metropolitan District Council

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1. Introduction

Wakefield Council intends to work closely with energy companies, installers and customers to maximise the input of Local Authority Flexible Eligibility (LA-Flex) Energy Company Obligation 2018-22 (ECO3) funding for fuel poor households in the Wakefield district.

Under the *Electricity and Gas (Energy Company Obligation) Order 2018*, local authorities can set their own eligibility criteria for LA-Flex ECO3 funding for domestic energy efficiency measures. This funding is aimed at those within a local authority's area most likely to be in fuel poverty or vulnerable to the effects of the cold. Energy companies can spend up to a maximum of 25% of their full ECO obligation through ECO-Flex. Wakefield Council's LA-Flex eligibility criteria is laid out in this Statement of Intent and it is a revised version (version 2) with the previous version being originally published in July 2017.

Leeds City Region (LCR) local authorities have adopted a city region-wide approach to implementing the LA-Flex (ECO3) policy initiative through the Better Homes Yorkshire (BHY) programme. The Wakefield Council Statement of Intent fits within this framework meaning that LA-Flex (ECO3) measures delivered in the Wakefield district will be exclusively delivered via this route.

This LA-Flex Statement of Intent is in line with Wakefield Council's strategic objectives to reduce carbon dioxide emissions, alleviate fuel poverty and support its residents to be healthier in their home. LA-Flex specifically contributes towards:

- The principles of the 'Wakefield Way' by tackling poverty, supporting vulnerable residents and improving resilience whilst achieving real impact, which when combined contributes towards our 'Wakefield Wellbeing' change priority;
- The Wakefield District Economic Strategy 2018-23 with its aim to create 'Successful People' by addressing poverty through domestic energy efficiency improvements to reduce fuel poverty; the aim to create 'Successful Places' by reducing carbon dioxide emissions and making homes warmer and healthier to live in; and, the aim to achieve 'Successful Businesses' by delivering home

improvements through local supply chains, helping to boost skills and economic growth;

- The Wakefield Together Vision for Wakefield and its aims to tackle poverty, support the most vulnerable to be safe and healthy and reduce our environmental impact;
- The Wakefield 'Climate Emergency Declaration' and its target to make the Council carbon neutral by 2030 and work with partners to achieve the same target for the whole District;
- The Wakefield Council Energy Plan contains the central vision for Wakefield *to be a thriving, sustainable district powered by clean energy and achieving good, clean growth* and includes activity aimed at improving the energy efficiency and lowering carbon dioxide emissions in local housing;
- The Clean Energy Pledge, signed up to by the Wakefield Council in 2017, which aims for the Wakefield district to be solely powered by clean energy by 2050;
- The Wakefield Affordable Warmth Charter and its core objective to reduce fuel poverty and for everyone in the Wakefield district to live in a warm and healthy home;
- The new Wakefield Housing Plan 2019-22 and its priorities to improve housing conditions and reduce fuel poverty by improving home energy efficiency standards through the delivery of insulation and heating improvements.

2. The approach to delivering ECO-Flex (ECO3)

Wakefield Council aims to maximise ECO-Flex (ECO3) funding for local residents and target those most in need of the support. In order to do this clear and simple criteria has been set in line with the *Energy Company Obligation: ECO3, 2018 – 22 Flexible Eligibility Guidance* to identify eligible households that are either:

(a) At risk of fuel poverty (Low Income High Cost (LIHC)); or,

(b) On a Low Income and Vulnerable to the Cold (LIVC).

This approach has been taken to maximise the potential for funding, however, fitting the criteria within this Statement of Intent does not guarantee that any individual household will benefit from energy saving improvements as the final decision on funding rests with energy suppliers and will depend on:

- The survey carried out and installation costs calculated;
- The energy savings that can be achieved for a property, and;
- Whether suppliers have achieved their ECO3 targets or require further measures to meet their ECO3 targets (this will affect the amount of funding available through the scheme).

This approach is Wakefield Council's current ECO-Flex (ECO3) policy and is under constant review. Future revised versions may be produced based on changes to legislation, local circumstances and strategic objectives.

3. How Wakefield Council will identify eligible households

Households will be considered to be eligible for ECO-Flex (ECO3) funding via one of four routes as defined below.

a) At risk of fuel poverty	Individually assessed	Route 1 – meeting Low Income High Cost criteria
		Route 2 – in receipt of Affordable Warmth Obligation benefit
	Priority target area	Route 3 - located in an Index of Multiple Deprivation 10% area
b) Low Income and Vulnerable to the Cold	Individually assessed	Route 4 – meeting Low Income and Vulnerable to the Cold criteria

a) At risk of fuel poverty

Households will be considered to be at risk of fuel poverty via three routes:

Route 1

Individually assessed as a low income household with high energy costs (Low Income High Cost) as defined below based on the March 2015 'Government Fuel Poverty Strategy'. To qualify both Stage 1 (Low Income) and Stage 2 (High Cost) criteria must be met.

Stage		Criteria
1. Low Income		Net annual household income of less than £21,000 (after rent or mortgage has been deducted).
2. High Cost (one of A, B or C must apply)	A	Property Energy Performance Certificate (EPC) rating of E, F or G.
	B	Property EPC rating of D as well as living in a 'hard-to-treat' home - defined as a property that has solid walls, non-standard cavity walls, system built walls, is off the gas network (i.e. gas is not the primary form of space heating), or has no loft space.
	C	Property EPC rating of D and it is a family household – defined as where there is a child aged under 16 residing in the household.

Route 2

Individually assessed and in receipt of an ECO3 'Affordable Warmth Obligation' Home Heating Cost Reduction Obligation (HHCRO) benefit as defined [here on the Government's website](#).

Route 3

Households that fall within the Lower Super Output Areas (LSOA) listed below are identified by Wakefield Council as priority target areas for ECO-Flex (ECO3). These LSOAs fall in to the 10% most deprived areas in England based on the [Index of Multiple Deprivation \(IMD\)](#) and Wakefield Council determines that households located in these areas are at a high risk of fuel poverty. Sole use of 10% IMD LSOA as a proxy eligibility criteria for being 'at risk of fuel poverty' is deemed appropriate given that there is also strong local intelligence that these areas of the Wakefield district have higher levels of deprivation, low income households and fuel poverty.

LSOA Code	LSOA Description	Ward
E01011750	Castleford Airedale, Between Holywell and The Square	Airedale and Ferry Fryston
E01011792	Kinsley West of Wakefield Road	Hemsworth
E01011746	Castleford New Fryston, Areas of Fryston Road	Airedale and Ferry Fryston
E01011780	Featherstone Priory Estate	Featherstone
E01011811	Knottingley Warwick Estate (East) and glassworks	Knottingley
E01011747	Castleford Red Hill, Areas around The Lakes Estate	Airedale and Ferry Fryston
E01011906	Wakefield Portobello	Wakefield South
E01011863	South Elmsall The Trees Estate	South Elmsall and South Kirkby
E01011910	Wakefield Eastmoor, Queen Elizabeth Road	Wakefield East
E01011917	Wakefield Belle Vue to Calder Vale	Wakefield East
E01011803	Warwick Estate (Simpsons Lane) and Rainsborough Park	Knottingley
E01011901	Wakefield Lupset, Chantry Road	Wakefield West
E01011916	Wakefield City Centre	Wakefield North
E01011842	Pontefract Barracks Estate	Pontefract North
E01011789	Hemsworth West End and Hemsworth Water Park	Hemsworth
E01011745	Castleford Fryston, Watling Road, Borrowdale Drive	Airedale and Ferry Fryston
E01011904	Wakefield Lupset, Whinney Moor Avenue	Wakefield West
E01011864	South Kirkby Hilltop Estate and South Kirkby Common	South Elmsall and South Kirkby
E01011899	Wakefield Lupset, Gissing Road	Wakefield West
E01011922	Wakefield Lupset, Snapethorpe Gate, Magdalene Road	Wakefield West
E01011756	Castleford Lisheen Avenue Estate	Castleford Central and Glasshoughton
E01011869	South Elmsall Moorthorpe	South Elmsall and South Kirkby
E01011911	Wakefield Eastmoor, Arncliffe Road, Linton Road	Wakefield East
E01011912	Wakefield College Grove	Wakefield East
E01011764	Castleford Cutsyke	Altofts and Whitwood
E01011838	Pontefract Area Around The Castle	Pontefract North
E01011850	Pontefract Willow Park	Pontefract South
E01011918	Wakefield Lupset, Lindsay Avenue and Johnson Road	Wakefield North
E01011791	Fitzwilliam Newstead Area	Hemsworth
E01011816	Normanton Queen Elizabeth Drive	Normanton

b) Low Income and Vulnerability to Cold

Households will be considered to be a low Income household and vulnerable to the effects of living in a cold home via one route as defined below:

Route 4

Individually assessed as a low Income household and vulnerable to the effects of living in a cold home if both Stage 1 (Low Income) criteria and someone in the household meets one of the Stage 2 (Vulnerable to Cold) criteria are satisfied. This criteria draws on the National Institute for Health and Care Excellence (NICE) NG6 'Excess winter deaths and illness and the health risks associated with cold homes' Guidelines.

Stage		Criteria
1. Low Income		Net annual household income of less than £21,000 (after rent or mortgage has been deducted).
3. Vulnerable to Cold (one of A or B must apply)	A – Health condition made worse by cold	Property EPC rating of D; and a health condition made worse by the cold, which includes chronic respiratory, cardio vascular, musculoskeletal illness, or mental health conditions.
	B – Vulnerable to Cold	Property EPC rating of D; and a vulnerable elderly person (defined as someone aged over 70); or someone that is pregnant living in the property.

4. Governance

The West Yorkshire Combined Authority (WYCA) approved the ECO-Flex approach on the 6 April 2017. The West Yorkshire Combined Authority consists of councillors from the West Yorkshire Authorities, City of York Council and a representative of the Leeds City Region Local Enterprise Partnership. This Wakefield Council Statement of Intent has been approved by the Service Director of Economic Growth and Skills.

Declarations of eligibility on behalf of Wakefield Council will be valid if signed by the Team Leader Housing Policy and Energy or the Service Manager for Strategic Housing and Regeneration based in the Strategic Housing and Regeneration Service.

Wakefield Council will not be acting on behalf of another Local Authority to issue ECO-Flex (ECO3) eligibility declarations.

5. Referrals

ECO-Flex (ECO3) schemes will generate and receive referrals through established partnerships and networks with internal and external stakeholders, including health and social workers and Wakefield Council's partners through the Wakefield Affordable Warmth Partnership. ECO-Flex (ECO3) scheme referrals will also be generated through direct scheme specific marketing and promotions targeted at households identified as being at risk of fuel poverty or on a low income and vulnerable to the cold.

All ECO-Flex (ECO3) funding will be delivered by the BHY programme, which was procured in December 2014 and launched in March 2015, to respond to the challenge of cold homes and fuel poverty. Wakefield Council joined the BHY programme in January 2017. WYCA, and all 10 LCR local authorities, contracted with ENGIE Regeneration (formerly Keepmoat) to deliver domestic energy efficiency measures, secure ECO and Green Deal funding (and their successors), up to 2022. Project cost controls through the BHY programme for all home energy efficiency improvement scheme measures are in place to ensure appropriate costs and value are delivered.

If ECO-Flex (ECO3) enquiries are received from members of the public, outside of BHY, they will be referred to BHY as the route for accessing ECO-Flex (ECO3) in the Wakefield district. If enquiries are received from home energy efficiency contractors regarding ECO-Flex (ECO3) funded improvement measures they will be referred to ENGIE Regeneration as the sole agent nominated to deliver ECO-Flex (ECO3) funding, via the BHY programme, in the Wakefield district.

Any ECO-Flex (ECO3) related enquiries are directed to:

Energy Team
Strategic Housing and Regeneration
Wakefield Council
Wakefield One
Burton Street
Wakefield
WF1 2EB

Telephone: 01924 305887

Email: eat@wakefield.gov.uk

Further information on Wakefield Council's BHY and ECO-Flex (ECO3) programmes is available at: www.wakefield.gov.uk/energy.

6. Evidence, monitoring and reporting

ENGIE Regeneration or its subcontractors, through their call centres or on a scheme specific basis at application stage, will determine ECO-Flex (ECO3) eligibility and

collect evidence, which will be retained in a secure system. All ECO-Flex (ECO3) data will be collected, stored and exchanged in line with the provisions of the Data Protection Act (DPA) and General Data Protection Regulations (GDPR).

ECO-Flex (ECO3) data will be collected and reported on a project-by-project basis. The number of residents targeted, signed up, measures installed, address, cost of installation, before and after EPCs, and ECO-Flex (ECO3) funding allocation and qualification criteria will be held for each household.

In line with the Department for Business, Energy and Industrial Strategy (BEIS) guidance, the Council will annually report in April, ECO-Flex delivery output data. This report will include the number of declarations and breakdown (LIVC, LIHC or in-fill), measures installed and associated local authority delivery costs. This report will also include details of any ECO-Flex analysis completed and any future ECO-Flex (ECO3) delivery plans.

Regular BHY programme meetings are held with WYCA, other Local Authorities and ENGIE Regeneration to monitor overall ECO-Flex (ECO3) progress and performance against key performance indicators (KPIs). Regular meetings are also held between Wakefield Council and ENGIE Regeneration and its subcontractors to monitor scheme specific ECO-Flex (ECO3) progress. The WYCA BHY Programme Manager also reports regularly to the BHY Programme Board on ECO-Flex (ECO3) progress, which is made up of senior representatives from each local authority and chaired by Bradford Council.

7. Signature



Clare Elliott
Service Director
Economic Growth and Skills
Wakefield Council

Date: 30/5/19

