

EAST SUSSEX BETTER TOGETHER & CONNECTING 4 YOU

ENERGY COMPANY OBLIGATION: HELP TO HEAT

LOCAL AUTHORITY FLEXIBLE ELIGIBILITY STATEMENT OF INTENT

Local authorities (the Councils): Eastbourne Borough Council

East Sussex County Council

Hastings Borough Council

Lewes District Council

Rother District Council

Wealden District Council

Date of publication: 1 November 2018

Version: 2.0

1. Introduction

- 1.1 This document seeks to respond to the statutory requirements for ECO Help to Heat as set out in the ECO2 Amendment Order <http://www.legislation.gov.uk/ukdsi/2017/9780111154175/contents> and the guidance to local authorities issued by BEIS <https://www.gov.uk/government/publications/energy-company-obligation-eco-help-to-heat-scheme-flexible-eligibility>. The BEIS guidance included a suggested template Statement of Intent, confirming the elements that are mandatory.¹
- 1.2 This is version 2.0 of this document. Version 1.0 was previously approved on 15 December 2017. Following a review of operation of this version of the statement of intent the income threshold was found to be a barrier to accessing ECO funding and hence this new version has a revised eligibility criterion.
- 1.3 Living in a cold home is a contributory factor to the number of excess winter deaths. Excess winter deaths (EWD) are the additional deaths that occur in winter months when compared with the non-winter months, due to various factors including:
- the temperature
 - the level of disease in the population
 - how well equipped people are to cope with the drop in temperature.

¹ The council credits the Association of Local Energy Officers (ALEO) for their template from which this Statement of intent has been adapted

- 1.4 Across East Sussex in the last five years an average of over 350 more people each year have died in the winter period compared with the rest of the year,² with 10 to 30% of these deaths estimated to have occurred because of the impact of cold temperatures in the home on vulnerable people.³ There are various complex factors that link cold temperatures to excess winter deaths. Home energy efficiency improvements have the potential to improve health, especially for those with respiratory illness, and mental wellbeing. This provides a rationale to pursue policies to upgrade the efficiency of the housing stock for particular target groups.
- 1.5 Like other areas of the country, East Sussex faces the challenge of how to continue to improve health and social outcomes whilst significant cuts are made to funding. The county has significant strengths and performs better than the national average for many indicators in the Public Health Outcomes Framework, despite relatively high levels of deprivation. However, demand for NHS and social care services is increasing rapidly, whilst the money the county has to pay for them is likely to stay about the same. The county's population is growing and people are living longer, so demand for health and social care is growing faster than the county's budget.
- 1.6 The Public Health Outcomes Framework includes the following indicators: i) percentage of households that experience fuel poverty based on the "Low income, high cost" methodology, and ii) excess winter deaths.
- 1.7 In 2012, it was estimated that the cost to the NHS in England of people living in homes that were too cold was around £1.36 billion per year.⁴ Implementing the recommendations of the NICE guideline on excess winter deaths and morbidity and the health risks associated with cold homes could help reduce demand for healthcare (primary and secondary care) and social care services. There are also numerous additional potential benefits of reducing fuel poverty from a societal perspective, including reduced social care costs, productivity gains by reducing sickness absence from work and carbon reduction.
- 1.8 A 150-week East Sussex Better Together (ESBT) programme commenced in August 2014 and is now transitioning to a new ESBT Alliance arrangement to transform health and social care services. The aim of ESBT is to develop a coordinated local health and social care system that ensures patients receive proactive, joined-up care, supporting them to live as independently as possible and achieving the best outcomes. ESBT about making sure the county uses its combined £850 million annual budget to achieve the best possible services for local people. The ESBT Alliance is made up of five local partners: Eastbourne, Hailsham and Seaford CCG, Hastings and Rother CCG, East Sussex County Council, East Sussex Healthcare

² Count of Excess Winter Deaths (EWD), all ages, persons. Five year average 2010/11 to 2014/15 = 355. Source: ONS Annual Public Health Mortality File.

³ Marmot Review Team. (2011) *The Health Impacts of Cold Homes and Fuel Poverty*. London: Friends of the Earth and the Marmot Review Team and WHO (2011) *Environmental Burden of Disease Associated with Inadequate Housing*.

⁴ Age UK (2012) *The cost of cold. Why we need to protect the health of older people in winter*. London: Age UK.

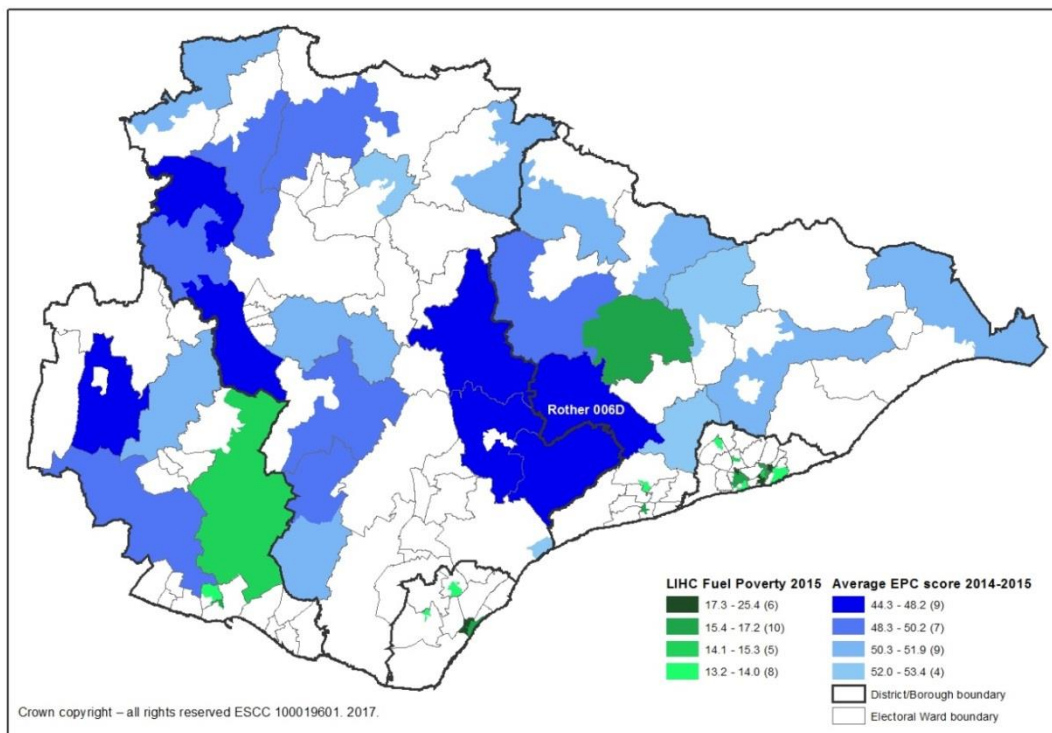
NHS Trust and associate partner Sussex Partnership NHS Foundation Trust. ESBT includes growing community and personal resilience as key priorities.

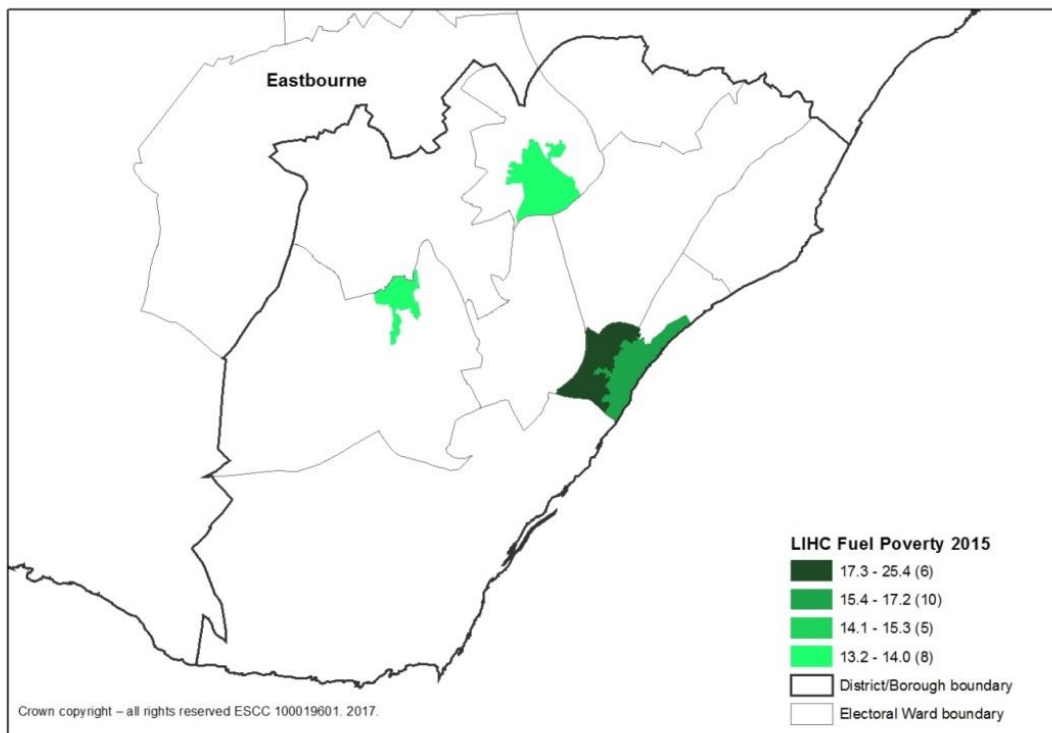
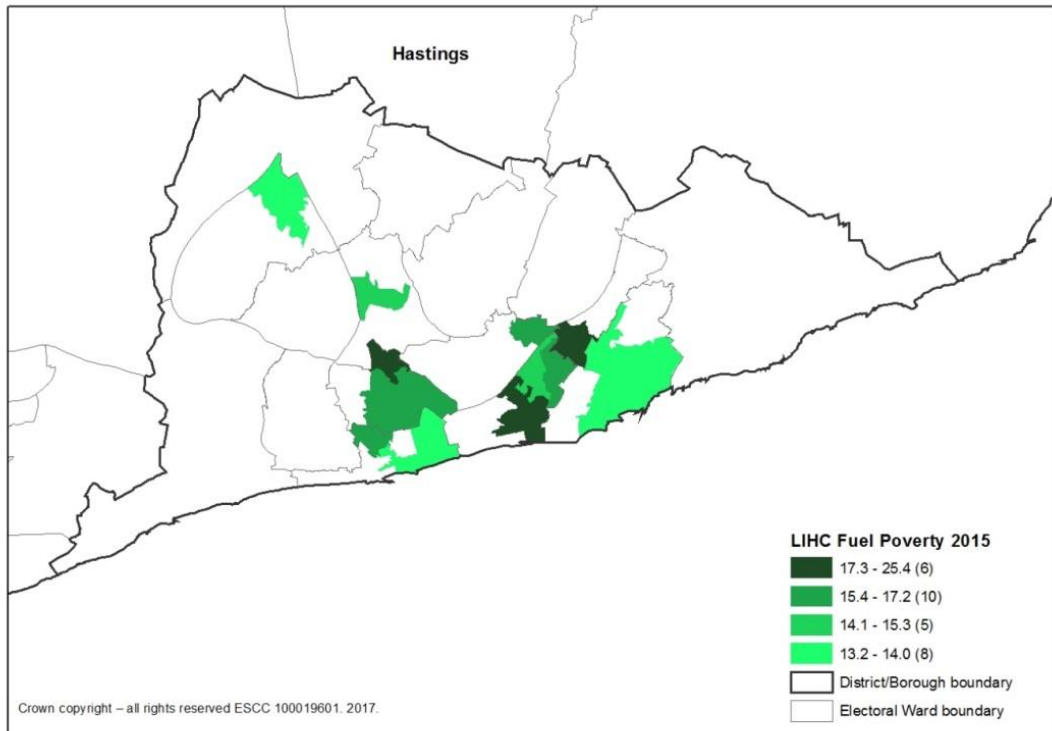
- 1.9 Connecting 4 You is a transformation programme that is being created in partnership by High Weald Lewes Havens (HWLH) CCG and East Sussex County Council to support the delivery of sustainable NHS and social care services. The key areas of work for Connecting 4 You include promoting health and wellbeing, preventing avoidable ill health and co-ordinating support services.
- 1.10 Fuel poverty is an important local priority for local authorities and partners in East Sussex and work to tackle the problem is coordinated through a fuel poverty reduction programme overseen by the East Sussex Energy Partnership (ESEP). ESEP's role is to provide a forum where partners can work together to ensure a consistent and coordinated approach to the delivery of interventions to tackle health and wellbeing issues related to cold homes, particularly for vulnerable groups, and other related issues.
- 1.11 East Sussex local authorities will work with ESEP, energy suppliers and their partners delivering the Help to Heat obligation. The final decision on whether any individual household will benefit from energy saving improvements 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.
- 1.12 The Councils expects any obligated energy supplier, or contractor working on their behalf to comply with the Data Protection Act, 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.
- 1.13 As permitted in the BEIS guidance on flexible eligibility local authorities in East Sussex are delegating functions for identifying eligible households in its area to **Hastings Borough Council**. Hastings Borough Council presently hosts the East Sussex Fuel Poverty Coordinator on behalf of ESEP and will work with the other members of ESEP to coordinate awareness activity and issue the Declarations of eligibility under the Local Authority Flexible eligibility scheme. For the avoidance of doubt East Sussex authorities can issue their own Declarations against this Statement of Intent should they so wish.

2. How the East Sussex local authorities (and partners) intend to target and identify eligible households

2.1 Targeting by area

- 2.1.1 The New Policy Institute (NPI) models the number of households that are eligible for help with energy efficiency. It estimated that in 2013 around 3.6 million or 14% of all households in Great Britain were eligible for help with energy efficiency. A crude estimate of the number of households eligible for help with energy efficiency in East Sussex in 2013 was 31,800. This estimate relates to the total number of households eligible for all elements of the Energy Company Obligation (ECO) scheme, taking in to account overlap in eligibility of these elements and by only considering dwellings that would benefit from one of the available measures.
- 2.1.2 Previous analysis of local fuel poverty data identified high priority Lower Super Output Areas (LSOAs) for East Sussex based on percentage of households in fuel poverty and a number of other deprivation measures. More recent analysis by the East Sussex County Council Health Intelligence Team has plotted estimated percentages of fuel poor households in all LSOAs against areas with the poorest Energy Performance Certificate (EPC) ratings. This has identified two distinct groups; those that are mainly urban LSOAs with the highest proportions of fuel poor households and below median EPC ratings and those that are mainly rural LSOAs with the lowest average EPC ratings and above median proportions of fuel poor households. It is these two groups that are prioritised for targeting. A full list of LSOAs that are to be target areas, and the wards they are in, are listed in Appendix 1.





2.2 Targeting by household characteristics:

- 2.2.1 East Sussex local authorities will seek to partner with organisations that are in contact with people who are vulnerable to the effects of living in a cold home. To promote effective referrals training on the identification and referral of those likely to be eligible for an assessment of eligibility under the ECO Flexible eligibility criteria will be offered as part of the East Sussex fuel poverty reductions programme.

2.2.2 ECO Help to Heat flexible eligibility funding is only available to private tenure households. In order to be eligible for this funding, a household must fit one or more of the following criteria:

- be in receipt of means tested benefits – but not currently accessing ECO funded measures
- be living in fuel poverty, but not in receipt of benefits ('fuel poverty')
- be on low income and vulnerable to cold ('LIVC')
- require Solid Wall Insulation (SWI) ("in-fill").

Criteria for identifying 'Living in fuel poverty, but not in receipt of benefits' (fuel poverty)

2.2.3 Fuel poverty is defined as living with low income but high heating costs. East Sussex local authorities, or the delegated local authority, will assess these elements to determine eligibility.

- i. For the 'low income' portion of this calculation, the Councils or delegated local authority will look to find evidence that a member of the household is in receipt of an income-related benefit in the first instance. Should the resident not receive any income-related benefits then the Councils or delegated local authority will consider a household in receipt of Council Tax Benefit or with a household income of less than the threshold details below.

Household composition	Gross annual household income	Gross monthly household income equivalent
One adult	£ 18,500	£ 1,542
and one child	£ 26,500	£ 2,208
and two children	£ 33,500	£ 2,792
and three children	£ 40,500	£ 3,375
and four or more children	£ 52,000	£ 4,333
Two adults	£ 27,000	£ 2,250
and one child	£ 32,000	£ 2,667
and two children	£ 39,000	£ 3,250
and three children	£ 46,500	£ 3,875
and four or more children	£ 52,000	£ 4,333

- ii. For the 'high cost' portion of the calculation, the Council or delegated local authority will look to identify eligible households as those that have an Energy Performance Certificate (EPC) rating of 'D' or lower in the first instance

2.2.4 If there is not an EPC for a property or in the event that a property does not meet that criteria 'high cost' properties will be identified as those that fall into the following additional criteria those being properties that have high energy bills or are hard to treat;

- a. Park homes or other permanent caravan residences
- b. Flats above commercial premises
- c. System built properties

- d. Homes which have inadequate insulation
- e. Homes with absent or defective⁵ central heating systems
- f. Homes with broken or inefficient⁶ electric storage heaters

Criteria for identifying 'low income and vulnerability to cold' (LIVC)

2.2.5 The Council or delegated local authority will assess two elements to determine eligibility for (LIVC):

- i. 'low income' portion of this identifier as set out in the previous section for 'fuel poverty'
- ii. 'vulnerability to cold' will be defined as any member of the household belonging to a group that is particularly vulnerable to the effects of living in a cold home, as described in the NICE guideline on excess winter deaths and morbidity and the health risks associated with cold homes.⁷ Specifically these groups are:
 - a. people with cardiovascular conditions
 - b. people with respiratory conditions (in particular, chronic obstructive pulmonary disease and childhood asthma)
 - c. people with mental health conditions
 - d. people with disabilities
 - e. older people (65 and older)
 - f. households with young children (from new-born to school age)
 - g. pregnant women

The following groups will also be considered vulnerable to the effects of living in a cold home:

- h. people with drug or alcohol dependency
- i. people who have attended hospital due to a fall
- j. people whose discharge from hospital or social care accommodation has been, or would be, delayed due to a cold home
- k. people with a terminal illness
- l. people with a suppressed immune system e.g. from cancer treatment or HIV

2.2.6 Any referral or enquiry received that does not meet the above requirements will be considered on a case by case basis.

2.3 Criteria for Solid Wall Insulation (SWI) "in-fill" projects

2.3.1 To increase the economies of scale of SWI projects, solid wall homes (i.e. no cavity wall) which are not 'fuel poor', will be eligible for Flexible ECO funding, where they are co-located with a minimum percentage of households assessed to be Fuel Poor (FP) or LIVC.

⁵ Broken down and unable to be economically repaired

⁶ An electric storage heater is inefficient if it has a manufactured responsiveness rating of 0.2 or less when assessed against the Standard Assessment Procedure

⁷ NICE (2015) NICE Guideline NG6: Excess winter deaths and morbidity and the health risks associated with cold homes. March 2015. London: National Institute for Health and Care Excellence.

2.3.2 The criteria for this will be:

- Semi-detached houses/bungalows and buildings with 2 premises – at least 50% of properties in an SWI project must be FP or LIVC
- Same terrace – at least 50% of properties in an SWI project must be FP or LIVC
- Same building – at least 50% of properties in an SWI project must be FP or LIVC
- Adjacent properties - at least 50% of properties in an SWI project must be FP or LIVC

3. Acting on behalf of another local authority

3.1 As permitted in the BEIS guidance on flexible eligibility the Council is delegating the function of identifying eligible households to Hastings Borough Council.

4. Joint statement of intent

4.1 This statement of intent has been prepared jointly with all local authority members of the East Sussex Energy Partnership (ESEP). All local authority members of ESEP (Hastings Borough Council, Rother District Council, Eastbourne Borough Council, Wealden District Council, Lewes District Council and East Sussex County Council) will use the common criteria set out in this statement of intent.


5. Evidence, monitoring and reporting

- 5.1 Anonymised data on the characteristics of households reached through flexible eligibility, the quantitative data on referrals received, those found to be ineligible and declarations issued will be reported to ESEP quarterly for review. The performance of the process and effectiveness of targeting can be assessed in order to identify areas that might be improved or require additional interventions to reach the intended targeted households.
- 5.2 A copy of all declarations issued by the council or delegated local authority will be retained as directed by BEIS
- 5.3 The delegated local authority will provide a report to BEIS on behalf of ESEP that reflects the reporting requirements suggested in the BEIS guidance on Flexible Eligibility.

6. Signatures

For and on behalf of;

Hastings Borough Council



Simon Hubbard
Director Operational Services

[Richard Parker-Harding]
[Head of Service]

Rother District Council

R. Parker-Harding

Wealden District Council



Andy Vincent
Head of Housing and Property Services

Annex 1 – Priority areas

Ward name	LSOA Name	Urban rural classification	Avg EPC score	% fuel poor hhlds (LIHC 2015)
Devonshire	Eastbourne 010D	Urban city and town	58.6	25.3
Devonshire	Eastbourne 010B	Urban city and town	59.2	23.7
Devonshire	Eastbourne 007A	Urban city and town	58.2	19.1
Devonshire	Eastbourne 010A	Urban city and town	62.9	16.6
Devonshire	Eastbourne 010C	Urban city and town	60.6	16.5
Hampden Park	Eastbourne 004C	Urban city and town	64.5	13.3
Old Town	Eastbourne 006B	Urban city and town	61.1	13.2
Braybrooke	Hastings 005C	Urban city and town	58.4	16.4
Castle	Hastings 009A	Urban city and town	57.5	19.0
Castle	Hastings 009D	Urban city and town	57.3	17.1
Castle	Hastings 009C	Urban city and town	58.4	15.0
Central St Leonards	Hastings 011A	Urban city and town	57.2	16.1
Central St Leonards	Hastings 011C	Urban city and town	62.0	13.7
Gensing	Hastings 008C	Urban city and town	56.9	19.8
Gensing	Hastings 008E	Urban city and town	60.6	15.6
Gensing	Hastings 011E	Urban city and town	60.6	15.6
Hollington	Hastings 003B	Urban city and town	64.9	13.8
Old Hastings	Hastings 007C	Urban city and town	58.7	13.7
Silverhill	Hastings 006B	Urban city and town	57.1	14.8
Tressell	Hastings 007E	Urban city and town	58.6	19.2
Barcombe and Hamsey	Lewes 001A	Rural village and dispersed	50.5	12.4
Kingston	Lewes 002C	Rural village and dispersed	50.1	11.2
Newhaven Denton and Meeching	Lewes 008D	Urban city and town	62.8	15.7
Newhaven Valley	Lewes 009B	Urban city and town	62.4	13.9
Newhaven Valley	Lewes 009D	Urban city and town	60.5	13.2
Ouse Valley and Ringmer	Lewes 004D	Urban city and town	58.4	15.1
Ouse Valley and Ringmer	Lewes 004A	Rural village and dispersed	56.5	14.6
Plumpton, Streat, East Chiltington and St John	Lewes 002E	Rural village and dispersed	46.2	12.9
Brede Valley	Rother 005A	Rural village and dispersed	51.7	11.4
Central	Rother 011A	Urban city and town	58.8	15.8
Crowhurst	Rother 006E	Rural village and dispersed	53.4	10.8
Crowhurst	Rother 006D	Rural village and dispersed	44.3	15.2
Darwell	Rother 003B	Rural village and dispersed	49.2	12.6
Darwell	Rother 003C	Rural village and dispersed	54.1	15.9
Eastern Rother	Rother 002A	Rural village and dispersed	50.5	13.0
Ewhurst and Sedlescombe	Rother 003D	Rural village and dispersed	53.1	13.0
Salehurst	Rother 001B	Rural town and fringe	51.0	10.1
Sidley	Rother 007D	Urban city and town	65.8	13.7
Ticehurst and Etchingam	Rother 001F	Rural village and	51.7	11.2

		dispersed		
Alfriston	Wealden 018B	Rural village and dispersed	50.9	10.7
Alfriston	Wealden 018A	Rural village and dispersed	48.7	7.0
Chiddingly and East Hoathly	Wealden 013B	Rural village and dispersed	50.1	10.2
Danehill/Fletching/Nutley	Wealden 013D	Rural village and dispersed	48.1	11.3
Danehill/Fletching/Nutley	Wealden 007B	Rural village and dispersed	49.3	9.9
Danehill/Fletching/Nutley	Wealden 007A	Rural village and dispersed	46.5	8.2
Forest Row	Wealden 001C	Urban city and town	50.8	11.0
Framfield	Wealden 008C	Rural village and dispersed	50.4	10.3
Frant/Withyham	Wealden 002C	Rural village and dispersed	49.3	12.3
Hartfield	Wealden 007C	Rural village and dispersed	49.3	9.4
Heathfield East	Wealden 011B	Rural village and dispersed	47.1	12.5
Heathfield East	Wealden 014A	Rural village and dispersed	45.4	12.4
Herstmonceux	Wealden 014C	Rural village and dispersed	47.1	12.9
Ninfield and Hooe with Wartling	Wealden 014D	Rural village and dispersed	48.0	13.0
Ninfield and Hooe with Wartling	Wealden 014E	Rural village and dispersed	47.6	11.0
Pevensey and Westham	Wealden 020B	Rural town and fringe	53.3	11.4
Rotherfield	Wealden 002D	Rural village and dispersed	53.0	6.8
Wadhurst	Wealden 005D	Rural village and dispersed	51.9	10.6

Annex 2 – Declaration Template

EAST SUSSEX BETTER TOGETHER & CONNECTING 4 YOU

ENERGY COMPANY OBLIGATION: HELP TO HEAT

LOCAL AUTHORITY DECLARATION – FUEL POVERTY

Name of local authority making the declaration	Click here to enter text.
Name of local authority you are acting on behalf of (where applicable)	Click here to enter text.
Declaration URN	Click here to enter text.
Statement of Intent publication date and version number	Click here to enter a date. Click here to enter text.
Statement of Intent internet link	Click here to enter text.
Address of premises	Click here to enter text. Click here to enter text. Click here to enter text. Click here to enter text. Click here to enter text. Click here to enter text.
Local authority declaration	
I declare that:	
<input type="checkbox"/>	the statement of Intent (Sol) for this local authority was published on or before the date this declaration was made and is currently available to view at the above location.
<input type="checkbox"/>	the local authority has been consulted on the installation of a measure (“heating qualifying action”) at the premises listed above. We confirm this consultation took place prior to the installation of measures.
<input type="checkbox"/>	in the opinion of the local authority, the premises listed above are occupied by a household(s) either: a) living in fuel poverty, OR b) are occupied by a household(s) living on a low income and vulnerable to the effects of a cold home.
Local authority officer name	Click here to enter text.
Local authority officer signature	Click here to enter text.
Job title	Click here to enter text.
Date of declaration	Click here to enter a date.
Local authority address	Click here to enter text.
Local authority telephone number	Click here to enter text.

EAST SUSSEX BETTER TOGETHER & CONNECTING 4 YOU
ENERGY COMPANY OBLIGATION: HELP TO HEAT
LOCAL AUTHORITY DECLARATION – SOLID WALL “IN-FILL”

Name of local authority making the declaration	Click here to enter text.	
Name of local authority you are acting on behalf of (where applicable)	Click here to enter text.	
Declaration URN	Click here to enter text.	
Statement of Intent publication date and version number	Click here to enter a date. Click here to enter text.	
Statement of Intent internet link	Click here to enter text.	
Address of premises		
	Relevant eligibility criteria	Premises type
Click here to enter text. Click here to enter text. Click here to enter text. Click here to enter text. Click here to enter text. Click here to enter text.	Choose an item.	Choose an item.
Click here to enter text. Click here to enter text. Click here to enter text. Click here to enter text. Click here to enter text. Click here to enter text.	Choose an item.	Choose an item.
Click here to enter text. Click here to enter text. Click here to enter text. Click here to enter text. Click here to enter text. Click here to enter text.	Choose an item.	Choose an item.
Click here to enter text. Click here to enter text. Click here to enter text. Click here to enter text. Click here to enter text. Click here to enter text.	Choose an item.	Choose an item.
Percentage of households listed above that are either living in fuel poverty or are low income and vulnerable to the effects of a cold home Click here to enter text. %		
Local authority declaration		
I declare that:		
<input type="checkbox"/>	the statement of Intent (Sol) for this local authority was published on or before the date this declaration was made and is currently available to view at the above	

	location.
<input type="checkbox"/>	the local authority has been consulted on the installation of the solid wall insulation at the premises listed above prior to the installation of a measure. We confirm this consultation took place prior to the installation of measures.
<input type="checkbox"/>	<ul style="list-style-type: none"> • (tick box only if relevant) the premises listed above are situated in a semi-detached house, a semi-detached bungalow or a building containing no more than two domestic premises; and • to the best of the local authority's knowledge and belief, both houses or bungalows in the pair of semi-detached properties or both premises in the building in that list are private domestic premises; and • in the opinion of the local authority, at least one of the premises in the pair of semi-detached properties or in the building is occupied by a household living in fuel poverty; or • in the opinion of the local authority, at least one of the premises in the pair of semi-detached properties or in the building is occupied by a household living on a low income and vulnerable to the effect of living in a cold home.
<input type="checkbox"/>	<ul style="list-style-type: none"> • (tick box only if relevant) all of the premises listed above are situated in the same building, in immediately adjacent buildings or in the dame terrace; and • to the best of the local authority's knowledge and belief, all of the premises are private domestic premises; and • in the opinion of the local authority, at least 50% of the premises are occupied by households living in fuel poverty or by households living on a low income and vulnerable to the effects of living in a cold home.

Local authority officer name	Click here to enter text.
Local authority officer signature	Click here to enter text.
Job title	Click here to enter text.
Date of declaration	Click here to enter a date.
Local authority address	Click here to enter text.
Local authority telephone number	Click here to enter text.

Notes

For each premise, one of the following must be selected for relevant eligibility criteria:

1. "Fuel poor" (if the premise is occupied by a household living in fuel poverty)
2. "Low income and vulnerable" (if the premise is occupied by a household living on a low income and are vulnerable to the effects of living in a cold home)
3. "SWI in-fill 50%" (if the premise is not occupied by a household in fuel poverty or low income and vulnerable. The percentage is dependent on the property type (see table below))
4. "SWI in-fill 50%" (if the premise is not occupied by a household in fuel poverty or low income and vulnerable. The percentage is dependent on the property type (see table below))

For each premise, one of the below property types must be selected for each address:

SWI in-fill property types	in-fill %
<ul style="list-style-type: none"> • Semi-detached house; or • semi-detached 	No less than 50%

	bungalow; or • building that contains no more than two domestic premises		
	• All properties listed are in the same building; or • in immediately adjacent buildings; or • same terrace	No less than 50%	