

City of Bradford Metropolitan District Council

HECA REPORT 2021

Introductory Questions

- *Name of Local Authority*

City of Bradford Metropolitan District Council

- *Type of Local Authority*

Metropolitan

- *Name, job title and email address of official submitting report*

Pete Betts – District Sustainability Housing & Energy Efficiency Officer – pete.betts@bradford.gov.uk

Headline and Overview

- *Does your Local Authority have a current strategy on carbon reduction and/or energy efficiency for domestic or non-domestic properties?*

Yes (contained within 'A Place To Call Home, A Place To Thrive – Housing Strategy for Bradford District 2020 – 2030')

- *If yes, please provide a link*

<https://www.bradford.gov.uk/housing/policies-and-reports/housing-and-related-strategies/>

- *If no, are you planning to develop one*

n/a

- *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?*

Bradford Council has been working with the North East, Yorkshire and Humber Energy Hub, Better Homes Yorkshire and Eclipse Energy to develop a proposal for the LAD Phase 2 funding allocated to the authority. This proposal is to deliver a scheme that will target 130 low income households who live in 'hard to treat' properties that will benefit from 'Room in the Roof' insulation measures. Initial work will target the Devonshire Street area (BD21) of central Keighley.

The Council continues to work with partners to develop new home energy efficiency programmes whenever external funding opportunities become available.

- *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*

The LAD Phase 2 project will deliver 'room in the roof' isolation measures to 130 properties. This will use grant funding from the LAD P2 scheme of £1,245,814 and will also receive and estimated

£34,511 for landlord contributions. The scheme will incur £123,459 costs, consisting of £58,035 for enabling works, a marketing budget of £12,240 and administration costs of £53,184.

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

Better Homes Yorkshire, the North East, Yorkshire and Humber Energy Hub, West Yorkshire Combined Authority, local health agencies, Groundwork UK (Green Doctors scheme), Warm Homes Fund, Scarbrook Plumbing, Eclipse Energy North Ltd. and Heating Ltd and JNR Contracting Ltd.

• *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.*

The LAD Phase 2 project will deliver 130 'room in the roof' measures, which will have save a total of £62,694 from residents' energy bills, make total lifetime energy savings of 125,805 kWh and make total lifetime carbon savings of 9,784 tCO₂ savings. The project will support 12 FTE jobs.

Communications

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

Yes

• *If yes, please briefly outline how this is undertaken*

Bradford Council publishes advice on how to save energy and other sustainability issues on its website. In addition, the authority supports the Green Doctors scheme in the district (operated by Groundwork UK), both providing referrals to the scheme and their LEAP / ECHO boiler replacement initiative and in turn, receiving referrals for the Bradford Healthy Heat Programme.

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

The Council issues regular e-bulletins known as "Stay Connected" to update subscribers on a range of issues, including energy and sustainability. These newsletters contain advice on saving energy for householders and also keep subscribers informed of special offers from Better Homes Yorkshire or any other council backed initiatives. There are current 6,500 subscribers to the mailing list.

Information about saving energy, fuel poverty and general sustainability issues are also published on the Bradford Council website.

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*

No

• *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*

All Council backed schemes require installers to work to the most recent standards (such as the move to PAS2035 for the LAD and ECO schemes). This means that installers working on these projects must undergo the necessary training to meet these standards, which drives a significant upskilling of the supply chain.

- *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?*

Bradford Council promotes energy efficiency work primarily by promoting the offers available from Better Homes Yorkshire through use of the council website and social media (the Council's Facebook page or Twitter feed); the "Stay Connected" e-newsletter to subscribers; leaflets, posters and other promotional materials distributed at events or at local amenities (libraries, one-stop shop facilities, etc.) and to community organisations; use of free local advertising opportunities such as city centre big screens.

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

n/a

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

Bradford Council has the facility to engage suitably certified installers through the Better Homes Yorkshire framework.

- *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?*

The Council is working with the Sustainable Development Partnership and other bodies like West Yorkshire Combined Authority to accelerate the decarbonisation of domestic and non-domestic properties. The West Yorkshire Strategic Economic Framework, Devolution Deal and Climate Emergency response are all aligned to secure the Net Zero by 2038, as per the WY Declaration and Pledge (Summer 2019). In the widest sense, the Council and all major partners, businesses and asset owners in and across the district are expected to ensure legislative compliance and this includes with the measures and requirements of the Climate Change Act and the parliamentary adopted target of Net Zero UK by 2050.

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?*

None, although social housing providers operating in the district are engaged with when suitable schemes are proposed where a partnership maybe advantageous. The Council's own housing stock amounts to 400 dwellings and all are less than 10 years old and therefore do not require retrofit energy efficiency or low carbon heat measures.

- *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)*

No. However, the council commissioned a Stock Modelling survey in 2016. This survey was a Private Sector Housing survey, but also provided a broad baseline of information about the condition of the social housing stock in the district. The report is caveated to state that this is high level data that would need to be overlaid with more detailed information from the Registered Social Landlords themselves.

- *If no, would it be easy/difficult to obtain this information?*

There are moves for the Council to liaise with social housing providers across the district about potential home energy efficiency programmes over the next two years.

- *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?*

n/a

- *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?*

n/a

- *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?*

This would be subject to discussions with social housing providers across the District.

- *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?*

Not known

- *Does the approach to retrofit change for leaseholders in mixed tenure blocks? What encourages them to co-operate?*

Not known

Domestic Private Rented Sector (PRS) Minimum Energy Efficiency Standards

- *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?*

Yes

- *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*

The Housing Operations team based within the Economy and Development service.

Contact: Julie Rhodes, Head of Housing Operations. Email: julie.rhodes@bradford.gov.uk

- *What method or methods does your authority use to communicate with landlords and tenants about the standards and other related issues?*

The Council has a “Stay Connected” bulletin for issues relating to privately rented accommodation. The service uses this to issue regular updates on a variety of issues including standards and related issues. The service has also sent targeted letters to the landlords of specific addresses with an EPC below Band E.

- *What barriers, if any, does your local authority face enforcing these regulations (e.g. identifying non-compliant properties/landlords, budgeting/resourcing, any legal issues)?*

Local authorities face a number of barriers to using Minimum Efficiency Standards regulations (MEES) as an enforcement tool including: disjointedness of MEES aligning with other enforcement regulations including the Housing Act 2004; too many landlords being unaware of the minimum standards; landlords being able to secure exemptions from carrying out improvement works; unreliable data based on EPC data which itself is flawed.

Capacity of the Housing Operations team to enforce compliance with this and other new legal powers is also a real issue. The Council has not been given any additional resources with which to recruit additional staff to enforce these new statutory responsibilities, so is currently only able to enforce these reactively.

A further barrier in the Bradford district is the large number of D & E rated properties in the Bradford district will make compliance challenging and will require both investment in the housing enforcement team of the Council and in financial incentives for landlords if we are to achieve compliance.

- *Do you directly target landlords of EPC F and G rated properties to enforce these regulations? If yes, how? If no, please explain*

The service has proactively targeted this group, although proactive programmes have been virtually curtailed during the Covid pandemic due to risks to staff and occupants.

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)

- *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?*

The Council has a capital programme offering financial assistance to vulnerable homeowners to undertake essential repairs to remove health and safety hazards. The programme is a loan first programme using equity share loans with a small grant funded programme available where a client requires financial assistance but is unable to access loan funding.

This programme would enable the Council to undertake works to repair or install heating and/or insulation in order to remove the hazards of excess cold or excess heat along with other works but is not a specific energy efficiency programme.

The programme is only available to owner occupiers.

The current programme is £4m over 3 years (2021/22 to 2023/24).

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

The Council continues to seek external funding to develop such programmes.

Fuel Poverty

- *Does your Local Authority have a Fuel Poverty Strategy?*

The latest fuel poverty strategy for the Bradford District can be found at <https://www.bradford.gov.uk/environment/climate-change/fuel-poverty/>

- *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?*

In 2015, Bradford Council commissioned the Building Research Establishment (BRE) to produce an Integrated Dwelling Level Housing Stock Modelling Report for the Bradford District, which included data and analysis on fuel poverty.

This report informs the work of Bradford Council to identify residents / properties as being in fuel poverty, along with other desktop research and statistics from other sources, including IMD indicators, EPC data, official fuel poverty statistics, etc. In addition, the council utilises local knowledge from partners, contractors and officers to inform work on fuel poverty.

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

n/a

- *Please highlight any fuel poverty issues specific to your area*

The Bradford District has a relatively high level of fuel poverty due to the high level of deprivation in parts of the District, low household incomes and the poor quality of the dwelling stock. Bradford has a lot of 'hard to treat' stock, often stone built terraced homes with a low energy performance. This type of stock is especially prevalent in the inner-city areas where there are the highest levels of fuel poverty.

- *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*

Bradford Council works in partnership with Engie Regeneration Ltd to deliver Better Homes Yorkshire, a regional programme that provides a framework of sub-contractors to deliver fuel poverty initiatives.

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?*

Yes

o If yes, please indicate which phase you participated in and briefly outline the project

Bradford Council has been successful in securing funding for both GHG:LAD Phase 1A & Phase 1B projects. Both of these projects were intended to provide polyurethane cavity wall insulation measures to 540 low-income households living in 'hard to treat' stone built properties in the inner suburbs of Bradford.

However, there have been issues preventing delivery that have resulted in both of these projects being on hold. Initially there was an issue with signing households up for the Phase 1A scheme at a time when new lockdown restrictions had just been announced by the Government due to the Covid 19 pandemic. However, a more long-term issue has arisen due to the sudden withdrawal of the insurance backed guarantee for polyurethane cavity wall insulation, required by TrustMark for the LAD scheme. This was totally unexpected and happened just as the promotional phase of the scheme was being mobilised. Bradford Council is currently in discussions with insurance companies, BEIS, TrustMark and our installers to try and find an alternative insurance product that would enable the LAD Phase 1 schemes to go ahead.

Bradford Council is intending to use funding from the GHG:LAD Phase 2 scheme to deliver a project during 2021 that will provide 130 'Room in the Roof' measures to low income households living in 'hard to treat' properties in central Keighley.

o If no, please indicate what barriers prevented you from participation in the scheme

n/a

• *Would your Local Authority be in a position to manage the delivery of upgrades through a scheme such as LAD in 2022?*

Yes

o If yes, please indicate the anticipated number of homes that could be upgraded per year

in the region of 500 homes a year. Of course, the number of homes that could be upgraded would depend on having found solutions to barriers to delivery of measures where there is a significant demand in the district, such as PAS2035 issues and the availability of insurance products required by the scheme, etc.

o If no, please indicate what barriers would prevent you from delivering upgrades in your area

n/a

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

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?*

35

- *How many declarations were issued for Fuel Poor households?*

92

- *How many declarations were issued for in-fill?*

0

- *What is the highest income cap published in your Sol?*

£21,000

- *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

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*

Bradford Council is not actively promoting smart meter take-up. However, the Council supports the efforts from a number of players, including the energy providers and various voluntary organisations active in the district, who are working to encourage residents to take advantage of installing a smart meter in their home.

- *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

n/a

b. Arranging for smart meters to be installed by energy suppliers in vacant social housing premises

n/a

c. Using social landlords to promote smart meter uptake

n/a

d. Including smart meters in landlord licencing schemes

n/a

e. Supporting residents who have had appliances condemned for safety reasons

n/a

f. Other supporting activities

n/a

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*

Bradford Council has always looked to work proactively with partners in both the public and private sectors to develop new projects to improve domestic energy efficiency in the homes of residents in the district. We will continue with this approach, actively looking for opportunities to deliver new programmes whenever opportunities become available.



Signed on behalf of

City of Bradford Metropolitan District Council

Name: Joanne Hyde

Date: 04 May 2021

Position: Strategic Director Corporate Resources