

Home Energy Conservation Act (HECA) Reporting 2021

The Home Energy Conservation Act 1995 requires local authorities (LAs) in England to submit regular reports to the Department for Business, Energy, and Industrial Strategy (BEIS) on measures adopted to improve energy efficiency in local homes.

Introductory Questions

Name of Local Authority: Tonbridge and Malling Borough Council

Type of Local Authority: Borough Council

Headline and Overview Questions

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

Tonbridge and Malling Borough Council adopted a motion in July 2019 which set out an “aspiration for Tonbridge and Malling to be carbon neutral by 2030” and for a strategy to be developed to support this ambition. A “Climate Change Strategy 2020-2030” was adopted, and an annual action plan is reported to Members at the relevant board. The Action plan has several themes and targets including housing and energy conservation. Consultants have been appointed to evidence, prioritise, and agree measures to be taken to lower carbon emissions at the Council and this work is in progress.

The Council's draft Local Plan includes policies that have an objective of carbon reduction and/or energy efficiency. With regards to housing these include achieving high quality sustainable design that harnesses natural light and heat through layout and orientation to reduce energy demands; parking standards that require the provision of a charging point for electric vehicles; and an overall development strategy which promotes a sustainable pattern of growth and sustainable transport that reduces the need to travel by personal motorised vehicles.

We are mindful of provisions currently being made at the national level which have the objective of improving the energy performance of new development. In particular the changes to the Building Regulations to deliver the Future Buildings Standard by the mid-2020s. It is the Council's understanding that the Future Homes Standard will significantly reduce the carbon emissions from new developments and make them zero-carbon ready as the supply of energy is de-carbonised. Given this commitment, the Council will seek to ensure that it only pursues measures and policies that complement these requirements.

The Council's adopted Managing Development and the Environment Development Plan Document (MDE DPD) includes a suite of climate change policies that have the objective of reducing the energy demands of new residential and non-residential buildings.

Kent and Medway local authorities have a very strong partnership working ethos and have several joint initiatives covering domestic properties, businesses, and the wider public sector. The Kent and Medway Environment Strategy sets the framework and identifies domestic energy and fuel poverty as a key priority/strand. This is further complimented by the Fuel Poverty Strategy developed and co-ordinated by the Kent Energy Efficiency Partnership.

The strategy aims to create actions to eliminate poor air quality, reduce fuel poverty and deliver an affordable, clean, and secure energy supply for Kent and Medway. It makes the link between supply of energy for housing, industry and transport and air quality, recognising that reducing emissions from the former will lead to improvements in the latter.

The Energy and Low Emissions Strategy goes further with regards to domestic energy, suggesting a range of strategic actions from collective switching, collective solar and domestic energy efficiency improvements through the Kent Warm Homes partnership.

The Borough Economic Recovery Strategy 2021-23 has as one of the key principles 'Cleaner and Greener – contributing towards net zero and encouraging sustainable growth'

If yes, please provide a link:

[Annex 2 - Final Climate Change Strategy.pdf \(tmbc.gov.uk\)](https://www.tmbc.gov.uk/downloads/download/246/managing-development-and-the-environment)
<https://www.tmbc.gov.uk/downloads/download/246/managing-development-and-the-environment>
<https://www.tmbc.gov.uk/downloads/download/284/economic-recovery-strategy-2021-2023>
<https://www.tmbc.gov.uk/downloads/download/274/delivering-available-warmth>
www.kentgov.uk/environmentstrategy

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 in the next two years?

- The Council is working in partnership with Fenland District Council and Clarion Housing Group having successfully obtained circa £2.25m Social Housing Decarbonisation Fund (SHDF) Demonstrator funding to deliver retrofit energy efficiency measures to up to 80 hard to treat Wimpey 'No Fines' constructed homes in Tonbridge. The stock owner Clarion will also provide circa £2.25m match funding. Furthermore, it is estimated that the project will generate 68 jobs and apprenticeships by accelerating retrofit plans, including use of local sub-contractors and installers.
- TMBC has been working with the Greater South East Energy Hub to deliver £332,903.88 Green Homes Grant Local Authority Delivery Phase 2 (GHG LAD2) funding to help improve the worst energy efficient homes occupied by low-income households across all tenures. Our delivery plan will focus on delivering energy efficiency improvements to up to 60 homes with an EPC rating of E, F and G.
- We will proactively target a further 100 privately rented properties in breach of Minimum Energy Efficiency Standard (MEEs). Following up where landlords have not responded to requests for information during our Private Rented Sector MEEs initiative 2020/21 and undertaking Housing Health and Safety Rating System (HHSRS) assessments to identify significant hazards including excess cold. As part of this work, we will include energy efficiency advice to landlords and advice regarding the requirements of MEEs. Where necessary the appropriate enforcement action will be taken. The landlord may

also be eligible for funding from the Council's discretionary housing assistance to improve the energy efficiency of the property and help reduce carbon emissions.

- The Council will continue to support eligible households in accessing Energy Company Obligation (ECO) funding to assist with the cost of installing heating and insulation through our Local Authority Flexible Eligibility ECO scheme (ECO LA FLEX)
- Support our residents by signposting to information on energy efficiency and renewable energy measures and funding schemes so they can make informed decisions. TMBC financial housing assistance is available to assist low income, vulnerable to cold households to access affordable warmth in the home while also encouraging these households to take action to reduce carbon emissions. We will seek to assist 10 households.
- The Council will be refreshing our Housing Assistance Policy, which makes available financial assistance to help eligible applicants with the cost of works to ensure the property is adequately heated and insulated, to include low carbon heating solutions.
- The Kent Warm Homes scheme which offers discounted (ECO) funded energy efficiency measures to residents across Kent.
- We are also able to refer eligible low-income households to Southern Gas Networks for help with first time gas connection and access The Warm Homes Fund (currently due to end August 2021) to help residents meet the cost of installing first time central heating.
- The Council is a partner in a successful consortium bid for GHG LAD Phase 1a funding and can refer eligible households for insulation and low carbon heating.
- Continue to support any new provision of temporary accommodation within the borough with feasibility studies to advise on potential for improved energy efficiency and any renewable energy measures potential.
- The Council will continue to work in partnership with others or directly fund the following housing/health improvement roles which can assist, as part of their wider role, in identifying and reducing the impact of cold homes through making referrals to national and local funding/schemes where available, to help residents keep their homes warm:
 - One You Advisors based in the Council's Health Improvement team
 - West Kent Health and Housing Coordinator roles based at two local hospitals
- The Council will participate in the second round of the Kent Solar Together scheme enabling residents to group together to get high quality solar panels at a competitive price.
- The Council will continue to participate in the Kent Energy Deal collective energy switching scheme

TMBC will also be looking to deliver the Home Upgrade Grant within the borough area to maximise benefit to our residents and any similar LAD funding schemes as they become available. We will use housing stock modelling data and the C-Path project tool and analysis (when available) to provide evidence base proposed projects.

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

Our annual Housing Assistance budget is a limited resource. Warm Homes Assistance can be useful to 'top-up' Energy Company Obligation (which does not cover the full cost of heating measures) so there is no upfront cost to the resident. Assistance becomes repayable on the sale of the property.

Between 2019-21 Warm Homes Assistance delivered 17 boiler replacement/heating improvements or first-time gas central heating with a total spend of £51,794.06 (plus an additional £12,969.83 Energy Company Obligation funding towards 12 of these heating works).

Administrative resource is required to promote national and local energy efficiency schemes and process TMBC Warm Homes Assistance applications. As well as our Housing Improvement Team delivering financial assistance and enforcement initiatives the Council has one part time Officer resource dedicated to developing energy efficiency initiatives. Other Council teams including Legal, Finance, Communications are also involved in developing and administering initiatives when required.

For some schemes the Council works with other partners, local authorities, Greater South East Energy Hub and managing agent to deliver a scheme, such as GHG LAD Phase 2 where administrative costs met by the managing agent is set % of funding as per guidance. There will however also be an administrative cost incurred by the Council in supporting this scheme for example formulating the delivery plan proposal.

The Council received £100,000 section 31 grant funding to enable participation in Department for Business, Energy, and Industrial Strategy (BEIS) PRS MEEs Compliance and Enforcement Study during 2020/21 which funded project set up, administration and management, including staffing resource and a dedicated MEEs Project Officer post.

Government recently proposed amendments to PRS MEEs regulations to increase the minimum standard to EPC Band C. We estimate 5,589 private rented properties have a Simple SAP rating of 68 or less (equivalent to an EPC rating of Band D or below) (BRE Housing Stock Modelling data 2020). To provide a similar proactive MEEs initiative with the Council targeting an estimated 2,580 private rented properties with an EPC rating of D or below, whilst responding to MEEs enforcement work, would require a total estimated budget of £80,000 per annum.

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

We work with many local organisations through our Housing & Health work including:

- Kent Local Authorities
- Kent & Medway Sustainable Energy Partnership
- Kent Energy Efficiency Partnership

- Greater South East Energy Hub (GSEEH) and contracted suppliers through the GSEEH Dynamic Purchasing Scheme
- Kent County Council, social services
- Public Health
- West Kent CCG and local NHS hospitals and services including falls prevention service
- Local GPs and health practitioners
- Warm Homes scheme provider
- Southern Gas Network/ Fuel Poor Network Extension Scheme
- Peabody South East–local Home Improvement Agency
- Age UK
- Voluntary organisations and other Kent based partnerships.
- collective energy switching scheme and Solar Together provider
- Citizen Advice
- Involve (care navigation and carers support services across West Kent)
- Energy suppliers
- Private landlords and agents and National Residential Landlords Association
- Registered providers of social housing

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.

Energy Efficiency schemes April 2019 -31 March 2021

The COVID 19 pandemic and national lockdowns during this reporting period have impacted on our Housing Improvement Teams proactive property visits in relation to financial assistance and reactive enforcement, particularly where vulnerable households were shielding.

- Warm Homes Assistance - 17 households have received the Council's financial assistance between April 2019 and March 2021 to improve energy efficiency of their homes - Total spend £51,794.06 (plus an additional £12,969.83 Energy Company Obligation funding towards 12 of these heating works).
- ECO LA Flex scheme - we have made an LA Flex declaration for 11 low income/vulnerable to cold households.

- ECO/Warm Homes Fund and SGN's Fuel Poor Network Extension scheme - we have sign-posted 2 private rented households for help with first time gas connection and gas central heating.
- Minimum Energy Efficiency Compliance and Enforcement - the Council has participated in the second year of the Department for Business, Energy, and Industrial Strategy PRS MEEs Compliance and Enforcement Study. This has enabled the Council to target 220 private rented properties which appear to breach Minimum Energy Efficiency Standard regulations. 47 properties have been improved and a further 35 are working towards compliance of a minimum EPC rating of band E. The COVID 19 has impacted on our ability to undertake proactive property inspections for the majority of 2020/21, and we will continue enforcement of properties in breach of MEEs during 2021/2022. To support our Private Rented sector: Minimum Energy Efficiency Standard (MEEs) initiative we developed a communications plan with our Media and Communications team which included a digital ad campaign during March 2021.
- Kent Solar Together - TMBC has participated in the Solar Together collective solar group purchasing scheme aimed at private sector households. It is anticipated 85 photovoltaic (PV) installations will be completed by end of July 2021.

The following schemes/plans have taken place to help reduce fuel poverty and deliver financial assistance to private sector housing residents to help fund energy efficiency improvements:

- TMBC Housing Assistance funding and Warm Homes scheme 'top up' funding-17 heating measures. Total spend £51,794.06 (including VAT)
- Kent Warm Homes scheme - 20 insulation and 12 heating measures. Total cost of completed works £59,448.32 including ECO funding £29,756.99 (excluding VAT) and £26,162.32 'top up' Warm Homes Assistance funding -see above *
- Kent Warm Homes scheme estimated sum of lifetime saving £203,473.00 (includes 12 boilers which received 'top up' Warm Homes Assistance funding) *

*Annual savings calculations are based on property /fuel type and using EST saving estimation figures.

- Formal enforcement action has been taken under the Housing Act 2004 at two private rented homes to remove a category 1 excess cold hazard.
- We promote the Energy Deal collective switching scheme and last year residents who switched saved over £51,000 (in total).
- The Tonbridge/Fenland area SHDF Demonstrator project aims to improve 80 homes in Tonbridge where property types have either EPC Band E or D to Band B which will significantly reduce carbon emissions and tenant energy bills. The scheme will generate 68 jobs and apprenticeships by accelerating retrofit plans, including use of local sub-contractors and installers.

Communications

Does your local authority provide any advisory service to customers on how to save energy? If yes, please outline briefly how this is undertaken.

The Housing Improvement Team offer advice to residents and private sector landlords on:

- Energy efficiency measures
- Funding/grant availability such as Kent & Medway Warm Homes scheme, ECO, GHG LAD
- Signpost to energy saving information such as Simple Energy Advice website
- Category 1 Excess Cold hazards
- Collective switching scheme, which enables wider advice to be offered where 'offline' registration.
- Kent Solar Together scheme

The Council does not own any stock and the principal registered social housing provider Clarion Housing offers an advisory service to their tenants on how to save energy.

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

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- Council website and social media
- targeted mailings including minimum energy efficiency standard enforcement, collective energy switching, renewables initiative Solar Together
- Kent & Medway Warm Home scheme website
- Private Rented Sector Landlord Forum
- press releases, parish newsletters
- community events and forums for example, health and wellbeing, older person days, Kent RISE disability event
- We actively promote energy saving/carbon reduction initiatives to local business through social media, business e-newsletter, referrals, and business networking events.
- Signpost business to Kent Sustainable Business Team for Low Carbon Kent and LOCASE funding. Low Carbon across South East
- Commencing from July 2020, we continue to run a Private Rented Sector MEEs initiative to raise awareness and ensure compliance to regulations.
- Housing Improvement Team make part of conversation with residents and landlords and signpost to information.

- Our Housing Improvement Team will offer advice on energy saving measures during home visits.

Unfortunately, community events and proactive home visits have not been possible for 2020/21 due to the impact of the COVID 19 pandemic.

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

N/A

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 Council has signposted/referred local businesses to the following initiatives:

- Kent Sustainable Business scheme for Low Carbon Kent (network of businesses with the aim to reduce costs by cutting emissions and promote the low carbon market)
- TALE grants ran until 30 April 2021 and 3 local businesses received grant funding
- LOCASE a grant and advice scheme aimed at helping businesses become more efficient and reduce carbon footprint. As at end of 2020, £238,321 grant had been allocated to 26 local businesses in Tonbridge & Malling area. The scheme also offers Business development Grants for businesses who offer low carbon(green) goods and services. STEM Steps to Environmental management scheme (STEM) workshops. A second phase of LoCase funding is now available: <https://locase.co.uk>
- opportunity to register interest in joining the Greater South East Energy Hub Dynamic Purchasing Scheme (via SME bulletin)

We have participated in the Kent Solar Together renewable initiative where suitably qualified installers have an opportunity to bid at auction in a group buying scheme to provide residents with a quote to install solar PV.

The Council is proposing to make available £150,000 to introduce a new Green Business Grant scheme offering grants up to £8,000 to help local businesses in the 'Green Sector' grow sustainably, and to support our wider business base to become more energy efficient and reduce its carbon footprint (subject to match funding of 40% per application).

What actions are you taking, if any, to promote energy efficiency and the local energy efficiency installer supply chain? This could include the facilitation of training, and local installer networking opportunities.

The Council promotes various national and local energy efficiency initiatives such as Green Homes Grant voucher scheme, Warm Homes ECO discounted insulation and heating scheme, Kent Solar Together scheme which provides impartial expert third party advice to homeowners considering photovoltaics (PV).

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

The key factors for a successful scheme include sufficient timescales for enabling resident engagement and delivery of the installation measures; simple to access funding with consistent criteria to help deliver initiatives over a longer term would be beneficial. A consistent fully funded offer for low-income households.

We consider the sustainability of energy efficiency schemes is very important to encourage investment and training in installer supply chain. The recent tight delivery timescales of some funding schemes, without certainty of future demand is inevitably a barrier to upskilling and growing a local installer supply chain and limits installer availability for consumers.

The COVID 19 pandemic has impacted on the uptake and engagement with residents due to restrictions on face-to-face interaction, home visits

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

A search on Simple Energy Advice website and Green Homes Grant website provides an indication of the lack of Kent based Trustmark approved installers

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?

Our current economic strategy runs to 2023 and we will start looking at measures beyond this in next 18 months and green economic policy/initiatives may well form part of this. The Greater South East Energy Hub (GSEEH) undertakes events to provide upskilling and training. We also hope GSEEH's setting up a Dynamic Purchasing Scheme may well encourage and increase locally qualified installers.

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?

The Council does not own any social housing stock.

The Council's adopted Managing Development and the Environment Development Plan Document (MDE DPD) includes a suite of climate change policies that have the objective of reducing the energy demands of new residential and non-residential buildings.

Clarion Housing, the main social housing provider in the Tonbridge and Malling area have installed external wall insulation to 76 properties in the Tonbridge area between April 2019 and March 2021 which they estimate will save 76 tonnes of CO₂ and a potential saving for residents of £18,620 (based on EST estimate of typical energy bill saving of £245 for a semi-detached home that has EWI installed).

We have been successful in a partnership Social Housing Decarbonisation Fund Demonstrator bid with Fenland District Council and Clarion Housing which will deliver retrofit works to up to 80 Wimpey No Fines constructed homes in Tonbridge during 2021.

Through Green Homes Grant Local Authority Delivery Phase 2 the Council hopes to partner with a local social housing provider to retrofit ten E, F or G EPC rated homes occupied by low-income households (maximum grant funding £5,000).

Properties have been identified utilising the Council's own housing stock modelling data information, Energy Performance Certificate (EPC) register data and officer local knowledge. We understand from the social housing provider Clarion Housing that identification of properties for energy works may be based on several approaches including EPC ratings where they have an active programme to upgrade low EPC E and below rated properties, identification of poor performing properties due to damp and mould complaints received and inclusion of energy efficiency measures with other planned maintenance works taking place at the property.

Do you have easy access to the information/knowledge within your organisation that you would expect to need for social housing projects? (e.g., stock condition, property data; approach to procurement, alignment with existing internal maintenance/upgrade plans; tenant engagement and management plans; costings)

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

The Council does not own any social housing stock.

Properties would be identified utilising the Council's own housing stock modelling data information, Energy Performance Certificate low banding data and officer local knowledge. We do not hold real time stock data on social housing and would have to approach local social housing providers where a housing stock modelling and data desk top analysis has indicated they own suitable stock that may meet the scheme funding criteria. Clearly if landlord match funding is also required this will need to be discussed.

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?

The Council is a smaller LSVT local authority and does not have a dedicated procurement specialist or energy efficiency officer for progressing retrofit schemes. The Council would seek to partner with a registered social housing provider/s to deliver improvements to social housing in our area.

The Council is very well placed to identify suitable properties for retrofit in their area across all tenures and ensure that funding is utilised to improve poor performing housing stock. We are keen to take up opportunities to apply for retrofit energy efficiency funding to improve housing condition in our borough, where we believe there is sufficient lead in time to set up and deliver social housing initiatives within the required time frame. For low-income households partial funding requiring a householder contribution can be a barrier to accessing energy efficiency measures. Where necessary we seek to combine funding strands to enable residents to benefit from the installation of heating measures at no up-front cost, which can result in complexity of managing the various strands particularly if the strands have different funding end dates.

Bid funding thresholds and scheme criteria may also be a challenging factor for example recent national funding requires both the property and the occupants meet certain eligibility criteria that are made up of several elements.

For social housing partners identifying match funding criteria may also need to be considered.

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?

See Q 21.

C-Path project tool and analysis is being developed which will allow LAs to identify suitable housing stock and measures for retrofit and likely costings. As a non-stock holding authority this will however be based on national datasets.

We will cross reference this with the Council' private sector housing stock modelled data. It will also be necessary to liaise with local social housing providers to identify suitable stock.

See Q 19 on how social housing partner identifies suitable stock

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?

We are keen to take up opportunities to apply for retrofit energy efficiency funding to improve housing condition in our borough, where we believe there is sufficient lead in time to set up and to deliver the scheme within the funding timescales.

To what extent are social housing tenants willing or unwilling to undergo retrofit, and what are the barriers and facilitators in their participation? If know, is this the same opinion across all social housing tenants or is it different with HA and ALMO tenants?

In our experience social housing tenants are sometimes unwilling to undergo retrofit heating and insulation works due to the upheaval particularly if a vulnerable household, issues re access requirements especially if tenants working, convenience in relation to timing of planned/reactive works, and lack of knowledge regarding new technology.

We understand from social housing provider Clarion Housing and our own experience that some tenants are resistant to having any works carried out, particularly regarding changes to the heating system for example an oil system to an air source heat pump. They would find it helpful to be able to signpost tenants to one source of easy-to-read information regarding the benefits of changing from older fossil fuel heating systems.

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

N/A

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.

Housing Improvement Team

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

The Council has participated in the BEIS PRS MEEs Compliance and Enforcement pilot Year 2 employing a MEEs Project Officer between September 2020 and March 2021. This dedicated resource has enabled the proactive targeting of 220 private rented sector properties where evidence available suggests they may be in breach of MEEs regulations. Up to March 2021, 47 properties have improved to a minimum EPC rating of E and 32 were working towards MEEs compliance. The Council will use remaining project funding to proactively enforce MEEs regulations during 2021/22.

A MEEs media campaign including, a news release, targeted digital advertising and radio advertising campaign have been generated and commenced 1 March 2021 over 4 weeks which will support our continued MEEs work from April 2021.

<https://www.tmbc.gov.uk/housing/landlords-tenants/2>

The Council participates in the West Kent Private Sector Landlords Forum.

Our cross-borough Kent Private Sector Housing Group Vice Chair is the South East National Residential Landlord Association representative.

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

From our experience of proactively enforcing MEEs regulations the challenges and barriers faced by local authorities include:

- Identification of where PRS properties are in the Borough requires on going verification of datasets
- Identification of PRS properties to proactively target and undertake appropriate enforcement action for those properties in breach of MEEs regulations requires significant staff resource.
- EPC data is available for a proportion of borough stock only.
- Generally, the Council does not receive reactive enquiries from tenants regarding non-compliant properties as affordable private rented accommodation is in low supply within the borough.

MEEs enforcement needs to link with the current Government review of the HHSRS to ensure legislation is consistent and in step. Where the Council is already taking enforcement action under Housing Act legislation, we will use this to deal with excess cold as it gives greater powers to remedy the situation.

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

If yes, how? If no, please explain.

See Q 29.

We have tailored our targeted landlord activity using an informal compliance and enforcement approach in the first instance which we believe best suits our TMBC MEEs initiative and has been productive in initiating a good response from landlords.

The Council will use remaining project funding to enforce MEEs regulations in 2021/22 where targeted landlords have not engaged or complied with the MEEs regulations following the informal enforcement approach. TMBC Minimum Energy Efficiency Regulations charging policy received Cabinet Member endorsement on 21 July 2020.

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 used, where such funding is sourced and where it is targeted.

We have an annual budget of £60,000 for our discretionary Housing Assistance funding, which includes funding of up to £10,000 (repayable on sale of the property) per property subject to certain eligibility criteria to remove category one hazards (Home Improvements Assistance) or to ensure a home is adequately heated and insulated (Warm Homes Assistance). Eligibility criteria for the Warm Homes Assistance includes owners or tenants with a repairing obligation who are:

- In receipt of an ECO eligible benefit
- have a health condition which could be made worse by living in a cold home

The Housing Assistance policy was amended in February 2019 to make available funding to encourage private rented sector landlords to improve the least energy efficient homes (EPC rated F or G), where a Category 1 Excess Cold hazard is present.

The Council participates in Local Authority Flexible Eligibility (LA Flex) to assist ECO eligible households who are low income and vulnerable to cold to access ECO funding.

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

The Council plans to participate in the following funding schemes to allow eligible households to benefit from funded energy efficiency measures and/or low carbon heat measures:

- GHG LAD 2 (2021/22) and any similar GHG LAD scheme in future
- Home Energy Upgrade scheme (2022) GHG LAD 2 or similar LAD schemes
- TMBC ECO LA Flex
- Social Housing Decarbonisation Fund (if Local Authority lead)
- TMBC Warm Homes Assistance

Fuel Poverty

Does your local authority have a fuel poverty strategy?

The Council has adopted **'Delivering Affordable Warmth, A Fuel Poverty Strategy for Kent'**. The Strategy has the aim of reducing fuel poverty, in line with national targets, and reducing the negative impact of cold homes on the health and wellbeing of Kent residents.

<https://www.tmbc.gov.uk/downloads/download/274/delivering-available-warmth>

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?

The Council commissioned a dwelling level housing stock modelling database in 2020 which provides an estimate of the presence of fuel poverty. We also utilise various data sets such as Government sub regional fuel poverty at LSOA and Energy Performance Certificates and GSEEH collated data.

It's significant challenge for local authorities to identify low-income households that are also living in the worst energy efficient housing. This involves processing, verifying, and combining various data sets that often includes modelled data, which is labour intensive.

Further barriers include compliance with data protection laws and the resource needed to ensure this.

Schemes could be more effectively targeted at fuel poor households with access to low-income data and vulnerability data such as the priority services data.

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

Our Climate Change Strategy and action plan includes a Housing and Energy Conservation theme which focuses on improving housing condition ensuring homes safe and warm by encouraging and supporting the installation of energy conservation and energy efficiency measures. Additional benefits for residents include improving homes to reduce energy consumption and therefore lower energy bills, improved thermal comfort and improved well-being.

The Kent and Medway Environment Strategy sets the framework and identifies domestic energy and fuel poverty as a key priority/strand. This is further complimented by the Fuel Poverty Strategy developed and co-ordinated by the Kent Energy Efficiency Partnership.

The strategy aims to create actions to eliminate poor air quality, reduce fuel poverty and deliver an affordable, clean, and secure energy supply for Kent and Medway.

Please highlight any fuel poverty issues specific to your area.

Tonbridge and Malling area has a thriving growing private rental sector which has increased significantly over the last 10 years. 16% of dwellings are estimated to be privately rented (8,773) and 27% of private sector households are estimated to have a low income with 18% of households estimated to be in fuel poverty (Housing Stock Modelling Data BRE 2020). 5.8% of PRS properties (508) have an EPC rating below band E and it is estimated that 10% of dwellings in the private rented sector are estimated to have a Category 1 hazard.

The area has high housing costs: average 3-bedroom house market price is £363,117 (ONS 2020); average 3-bedroom rental value is £1250 pcm (ONS). In TMBC we have 3 Local Housing Allowance areas where 3-bedroom house rental prices range between £845-£1,126 pcm.

In TMBC 2% (1,343) of residential homes have listed building status and 9% (5,104) are in a conservation area.

We estimate that 648 'off gas' properties have a Simple SAP rating of less than 68.

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.

We have signposted households to:

- Kent & Medway Warm Homes referral for heating and insulation measures
- Housing Improvement Team for grant and private sector housing advice
- Kent Energy Deal collective energy switching scheme

This may involve referral for insulation or heating measures through:

- Fuel Poor Network Extension scheme for gas connection (ECO & LA FLEX)
- Kent & Medway Warm Homes scheme (ECO & LA FLEX)
- TMBC Warm Homes Assistance (ECO or vulnerable to cold due to a health condition)
- Other available funding for example SGN's Central Heating fund until March 2021 (ECO & LA Flex)

The Council continues to participate in Local Authority Flexible Eligibility (ECO) to help low-income households benefit from discounted insulation and heating measures

<https://www.tmbc.gov.uk/downloads/download/273/energy---flexible-statement-of-intent>

TMBC makes available Warm Homes Assistance to ensure owner occupier and private tenants with a repairing obligation have adequate heating and insulation where they receive an income related benefit, or a member of the household has a health condition that may be exacerbated by living in a cold home. Funding is also available to encourage private sector landlords to improve the least energy efficient homes where a Category 1 Excess Cold hazard is present (50% landlord match funding required).

In 2020/21 Covid Winter Grant was paid to upper tier councils to ensure that vulnerable households, particularly those with children, were not struggling to pay for food or fuel over the winter months. Kent County Council distributed some of this funding to district councils and TMBC received £58,017.55. The Council ran a Covid Winter Grant Scheme aimed to help families access food and pay for fuel. Examples of the Covid Winter Grant Scheme initiatives in relation to fuel poverty include:

- Tonbridge Baptist Church supporting 30 identified vulnerable households in Tonbridge who have been adversely affected by Covid with £100 per month for three months, to help towards gas and electricity bills from January to March via monthly credits to prepayment fuel cards.
- Citizens Advice in North and West Kent providing targeted financial support for vulnerable households and families, in the form of crisis payments to meet urgent essentials such as utility or water bills, where they have no other realistic alternative to meet the need.

The Council also funded the following health initiatives:

- One You Your Home Officer (FTE) based for two days a week in a GP surgery (to end September 2020)
- West Kent Health and Housing Coordinators based at two local hospitals and linked handyperson services, and

Other initiatives also included:

- targeted energy efficiency schemes to households in the borough
- offline registrations to our collective switching scheme enabled wider advice to be offered at registrations

The Council does not own housing stock. The main registered provider of social housing, Clarion Housing, has a regional energy advice service for their tenants.

Green Homes Grant Local Authority Delivery

Of the £2bn Green Homes Grant scheme introduced in summer 2020, £500 m 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.
- If no, please indicate what barriers prevented you from participation in the scheme.

The Council does not own any social housing stock. We concluded it would be inappropriate for TMBC to bid for LAD1a and LAD1 b funding independently as it is likely we would be unable to meet the required bid thresholds (£500k and £250K respectively) solely based on identifying suitable private sector homes within the bid delivery timescale.

TMBC is a partner on Dartford District Council's Phase 1a bid along with Tunbridge Wells, Gravesham, Dover, Ashford, and Swale Councils where we can signpost eligible households to Dartford DC (lead authority).

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.

The Council is participating in GHG LAD Phase 2. Greater South East Energy Hub is acting as lead authority and has set up a Dynamic Purchasing scheme. A managing agent has been procured by GSEEH for LAD Phase 2.

With this type of programme/administrative support, the Council would be keen to deliver energy efficiency upgrades for a similar scheme such as LAD in 2022.

TMBC stock modelling data (BRE 2020) estimates the following number of properties across all tenures. The anticipated number of homes for a scheme like LAD2 will be subject to whether the household meets low-income criteria:

- Total number of homes - 54,476
EPC Band E, F, G - 7,004
- Number of private rented sector homes - 8,773
EPC Band E, F, G properties - 1,168
- Number of private sector owner occupied homes - 36,571
EPC Band E, F, G properties - 4,560
- Number of social housing homes - 9,132
EPC band E, F, G properties - 1,276

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?

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?

11

How many declarations were issued for Fuel Poor households?

None

How many declarations were issued for in-fill?

None

What is the highest income cap published in your Sol?

£30,000

If you used a gross 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.

Please provide further on activities relating to smart metering, including but not limited to:

- Integrating approaches to delivering energy efficiency improvements in residential accommodation
- Arranging for smart meters to be installed by the energy suppliers in vacant social housing premises.
- Using social landlords to promote smart meter uptake
- Including smart meters in landlord licencing schemes
- Supporting residents who have had appliance condemned for safety reasons
- Other supporting activities

We do not actively promote smart metering. Our Housing Improvement Team will make part of our conversation with landlords/tenants and signpost to smart meter information.

If the Council receives enquiries or referrals for a resident who have had a heating appliance condemned for safety reasons following a smart meter installation our Housing Improvement Team can offer advice and/or visit to carry out an inspection and signpost owner or landlord/tenant to funding assistance where applicable. ECO funding or Warm Homes Assistance may apply depending on household circumstances.

Future Schemes or Wider Initiatives

Please outline any future schemes or wider initiatives not covered above that your local authority has carried out or is planning to undertake to improve the energy efficiency of residential accommodation.

As part of the Council's homelessness strategy, we purchased ten temporary accommodation properties, including six self-contained flats.

South East Energy Hub has undertaken a feasibility assessment for four temporary accommodation units which will inform the conversion/renovation works due to take place in 2021/2022. It is anticipated that all units will be well insulated with low carbon heating systems (air source heat pumps) helping reduce carbon emissions and providing homeless households with affordable to heat, warm accommodation.