



**CENTRE FOR
SUSTAINABLE
ENERGY**

Tackling fuel poverty at local & regional level: Opportunities to deliver action & policies to stimulate success

Paper to the Department for Environment, Food and Rural Affairs (Defra)

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The views expressed in this report are those of the authors. They should not be taken to represent the views of Defra or the Fuel Poverty Advisory Group or any of its individual members.

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Paper to Defra from the Centre for Sustainable Energy

Executive Summary

There has been little attempt to date to define how local and regional public bodies in England can contribute effectively to the national objective to eradicate fuel poverty. There is also no explicit requirement on local and regional bodies to contribute to this objective. As a result, beyond a few impressive pockets of 'best practice', only a limited contribution is being made.

Yet local and regional bodies already have a wide range of powers and responsibilities and provide public services which are directly implicated in the delivery of effective solutions to fuel poverty.

This study, commissioned by the Department for Environment, Food and Rural Affairs (Defra), reviews these policy and service delivery domains to outline the significant potential for action at local and regional level to tackle fuel poverty. It develops policy proposals to stimulate local and regional bodies to improve their performance and thus realise much more of this potential. It also makes recommendations on actions that might be pursued, particularly by the Fuel Poverty Advisory Group (FPAG), to ensure these policy proposals are taken forward.

• Fuel poverty as a 'cross cutting' issue

The causes of, and therefore the solutions to, fuel poverty are complex. This ensures that fuel poverty straddles a host of policy and service delivery domains. Many of these already have a strong local and/or regional dimension:

- Housing policy, strategic oversight, inspection and direct management (social, private rented, and owner-occupier)
- Energy efficiency standards for new and existing dwellings (and their enforcement)
- Renewal and regeneration programmes
- Planning policy for affordable housing and for buildings integrated renewables
- Social services (care provision and independent living)
- Primary care health services
- Welfare rights advice and benefits provision (e.g. Council tax benefit, housing benefit, free school meals)
- Energy advice delivery
- Engagement with energy supplier energy efficiency programmes and Warm Front (particularly via referral systems and integrated grant programmes)

Addressing fuel poverty through local and regional action is therefore not necessarily about new activities or new powers for local or regional bodies. It is about changing and/or improving relevant existing local and regional activities so that they more fully reflect (and contribute towards) the national objective of eradicating fuel poverty.

• The role of the 'Wilful Individual'

There are some impressive examples of what can be done locally and regionally to tackle fuel poverty. But such 'best practice' is undoubtedly the exception rather than the rule, with most achieving far less. Moreover, such 'best practice' is principally down to the work of enthused, informed and committed individuals.

With limited explicit requirements on local or regional bodies to take account of fuel poverty, these 'Wilful Individuals' have taken it upon themselves to secure progress. They have applied their willpower, doggedness and professional expertise, typically over several years, and managed to create conditions within their organisations in which they can operate effectively.

In the absence of more explicit requirements for action on fuel poverty by local and regional bodies, the 'best practice' established by these Wilful Individuals is unlikely to be replicable by anyone other than another Wilful Individual.

- **Beyond ‘best practice’ – securing more ‘good enough practice’?**

Indeed, there is little evidence that the ‘best practice’ of the few is managing to stimulate improvement in the performance by the many, in spite of programmes designed to achieve just this. It is certainly not the case that the best practice of 10 years ago is now the norm.

This may be because the high standards set by current ‘best practice’ actually represent the impressive summit of many years of sustained activity. Such ‘best practice’ can therefore create a disempowering sense of being beyond the reach of someone looking to improve their own practice.

There would be value in charting more precisely the steps from poor to excellent practice and in setting out clearly a benchmark for ‘good enough practice’ for local and regional bodies within a national effort to eradicate fuel poverty.

- **The focus for future policy: creating a context in which the less wilful can act**

The focus for policy must therefore be on creating conditions at local and regional level which enable and encourage less dogged, less wilful, but still professionally competent individuals to achieve much more.

- **Introducing the Local and Regional Fuel Poverty Action Matrix**

To define more clearly the opportunities for local and regional bodies to tackle fuel poverty, the project team has developed the Local and Regional Fuel Poverty Action Matrix. This analyses performance across the wide range of policy and service delivery domains relevant to fuel poverty. Guided by existing levers for action and existing examples of best practice, the Matrix describes four levels of performance for each domain – ‘weak’, ‘fair’, ‘good’ and ‘excellent’.

By detailing each level of performance (rather than just ‘best’/‘excellent’ practice), the Matrix provides a picture of the incremental steps associated with performance improvement. It therefore has the potential to act as both a yardstick to measure performance and a guide to improve it.

The Matrix can also guide national policy makers in terms of what potentially could be expected of local and regional bodies if they aligned their activities more effectively with national fuel poverty objectives (see pages 13 to 19).

The key areas for local and regional action

From the extensive range of actions identified in the Matrix, there are five areas where we believe the contribution of local and regional bodies can be most significant:

- Housing:** Decent Homes Standard, own and social housing stock, and plans for use of Housing Health and Safety Rating System in the private sector.
- Grants:** Integrating own grant funding with energy supplier EEC funding and Warm Front to improve targeting and fill in funding gaps where national entitlement rules fail to capture all genuine fuel poor households (potentially through effective sub-regional partnerships of local authorities).
- Coordination** Principally at sub-regional (eg ‘county’) levels, partnering with other local authorities, local energy agencies, health and social services, advice providers, to establish effective referral systems and sufficient critical mass for negotiating local funding and comprehensive delivery.
- Benefits take-up and advice:** With particular emphasis on increasing take-up of benefits which both increase income and ‘passport’ to funding for improvements to thermal performance of housing (Warm Front and EEC).
- Regional public health and housing strategies:** To reflect fully the importance of high standards of affordable warmth in the provision of affordable housing and effective public health.

- **Policies to secure improvement in performance by local and regional bodies**

The Matrix shows what could be done. But it cannot guarantee that it will be done. Indeed, it also shows that, within the range of possible responses, local and regional bodies could get away with doing virtually nothing.

It currently takes a Wilful Individual to deliver 'good' or 'excellent' performance. As a result, very few local or regional bodies meet these standards. Most are therefore falling well short of the contribution they could be making to national efforts to eradicate fuel poverty.

The policy-making focus must therefore be to create conditions in which the 'weak' and 'fair' are stimulated to improve their performance. This requires national effort to:

- Increase senior management attention on fuel poverty and the priority they give the issue
- Establish clear expectations for action to tackle fuel poverty by local and regional bodies and ensure that any failure to act has appropriate consequences
- Guide existing national programmes to take account of the potential for local and regional action
- Provide support, training and data to enable effective performance improvement.

Six key policy priorities for national action are identified as a package to drive performance improvement across all English local authorities and regions:

1. The introduction of fuel poverty into Comprehensive Performance Assessment (CPA) for local authorities (tied to a legal duty to address fuel poverty) and into equivalent priority setting and assessment processes for regional bodies.
2. Clear and explicit guidance from national Government on what it expects from local and regional bodies in relation to fuel poverty, how these integrate with existing activities (e.g. housing management, local advice provision etc), and how they align with national policies and programmes.
3. An affordable warmth-driven SAP target within the DHS, in common with Warm Front, and alignment of the DHS private sector 'vulnerable households' target with that of the Fuel Poverty Strategy for England.
4. An explicit challenge to Warm Front Scheme managers and energy suppliers (in relation to their EEC Priority Group activities) to improve their engagement with local authorities (or appropriate regional co-ordinating functions) to maximise the opportunity for integration of assistance programmes which can benefit fuel poor households.
5. Training, support and co-ordination – to build skills and competencies, support organisational change and strategy development to reflect fuel poverty priorities, enable sharing of resources and experience (and avoid duplication), provide appropriate technical advice, and simplify funding streams.
6. Standard monitoring, evaluation and reporting methodologies and the provision of high resolution data on the local incidence of fuel poverty, insulation and heating improvement activities, and benefit take-up.

- **Actions to deliver these priorities**

To deliver this package of policy measures, we recommend that FPAG:

- a. Engage with the Local Government Association and ODPM on establishing fuel poverty as a tangible cross-cutting component of CPA and introducing an appropriate legal duty.
- b. Engage with Defra, EST and NEA to establish a clear target (and potentially funding) for EST and NEA work on fuel poverty through local and sub-regional organisations and regional programmes, building on such organisations' existing relationships and partnerships.
- c. Engage Defra, the Energy Retail Association and Eaga to improve the quality of engagement within EEC and Warm Front at regional or sub-regional level.
- d. Engage Defra and DTI and EST on access to data and standardising evaluation and reporting methodologies.
- e. Engage ODPM on ensuring local authority access to Home Condition Report energy performance data and EST on access to HEED and energy survey data.
- f. Review the specification for current best practice programmes for local authorities with view to providing more incremental guide to improvement and a stronger focus on improving performance amongst the currently weak and fair authorities.

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1 Introduction

In spite of the references in the Energy White Paper to a 'key role' for local authorities and regional public bodies to deliver sustainable energy objectives, there has been little work to define this role in relation to the target of eradicating fuel poverty. Indeed, consecutive annual progress reports on the UK Fuel Poverty Strategy and the Fuel Poverty Action Plan for England make only passing mention of the role of local and regional bodies.

This is perhaps surprising bearing in mind that local authorities (in their various forms) already have a range of powers and responsibilities and provide public services which are directly implicated in the delivery of effective solutions to fuel poverty. Similarly, regional bodies increasingly have strategic responsibilities – for example for housing, public health, regeneration – which are potentially relevant to fuel poverty.

Yet, with the possible exception of the Decent Homes Standard target for the social housing sector, these powers, responsibilities and services have not been systematically considered in terms of how they might be productively 'aligned' with the national fuel poverty policy objectives. As a result, beyond the few impressive pockets of 'best practice', the potential of local and regional action to address fuel poverty is not being realised.

This study was commissioned by the Department for Environment, Food and Rural Affairs (Defra) to address this apparent failing directly and meet the following objectives:

- to identify the levers and opportunities which exist for action at regional and local level to tackle fuel poverty;
- in the context of the available levers and opportunities, to define effective action on fuel poverty by both local and regional bodies;
- to develop policy proposals which could stimulate improved performance by local and regional bodies.

This study builds on a project led by the Centre for Sustainable Energy for the Climate Change Programme Review (CCPR) which examined the potential in England for local and regional action to curb carbon emissions.¹ It draws heavily on the approach developed for the CCPR study and takes advantage of the stakeholder consultation undertaken during that study, particularly in relation to national policy developments to stimulate improved performance by local and regional bodies.²

1 The report of the CCPR study 'Local and Regional Action to Cut Carbon' is available at www.cse.org.uk/pdf/pub1057.pdf

2 In terms of scope, this study has adopted the same definition of 'local and regional bodies' used in the CCPR study: "local authorities, Regional Development Agencies and Regional Assemblies in England including all formally connected committees, boards and groups." We have also considered the role of the local and regional health sector to the extent that these relate to the roles of the local and regional bodies.

2 Fuel poverty requires 'cross-cutting' solutions

Fuel poverty results from a combination of some or all of the following factors: low income; poorly insulated housing; inefficient and/or high cost heating options; poor energy using behaviour; extended need for warmth.

Sustained solutions to fuel poverty therefore lie in improving the thermal efficiency of housing, improving incomes, encouraging better energy using behaviour, and securing lower cost heating options (including lower cost fuel – potentially by tariff or fuel type) for households in, or at risk of, fuel poverty. It also requires us to find and identify those households in, or at risk of, fuel poverty.

Such a complex mix of causes and the similarly complex combination of solutions ensures that fuel poverty straddles a host of policy and service delivery domains. Many of these already have a strong local and/or regional dimension. For example:

- Housing policy, strategic oversight, inspection and direct management (social, private rented, and owner-occupier)
- Energy efficiency standards for new and existing dwellings (and their enforcement)
- Renewal and regeneration programmes
- Planning policy for affordable housing and for buildings integrated renewables
- Social services (care provision and independent living)
- Primary care health services
- Welfare rights advice and benefits provision (e.g. Council tax benefit, housing benefit, free school meals)
- Energy advice delivery
- Engagement with energy supplier energy efficiency programmes and Warm Front (particularly via referral systems and integrated grant programmes)

Addressing fuel poverty through local and regional action is therefore not necessarily about new activities for local or regional bodies. It is about changing and/or improving relevant existing activities so that they more fully reflect (and contribute towards) the national objective of eradicating fuel poverty.

3 The role of the 'Wilful Individual' – showing what can be done

To demonstrate what can be done by local and regional bodies to tackle fuel poverty, we are fortunate to have impressive examples of 'best practice'. As a result, many are familiar with the Newark & Sherwoods, Stocktons, Newcastles, Manchesters, Lutons, Cornwalls, and South East Regional Public Health Directors of this world.

However, from the evidence assessed for this study and the experience of the project team, these are the exception rather than the rule. Moreover, it is clear that this best practice at local and regional level is principally down to the work of a small number of enthused, informed and committed individuals. With few explicit requirements on local or regional bodies to take account of fuel poverty, these individuals have taken it upon themselves to secure progress.

Through their willpower, doggedness and professional expertise, these 'Wilful Individuals' have managed to create and sustain the conditions within a local authority or in some regional body in which they can operate effectively. They ensure that advantage is taken of new powers and opportunities to act (eg wellbeing powers, spend to save, decent homes

standards, housing health and safety rating etc) and they provide ample fodder for the various 'best practice' programmes that seek to encourage others to follow their lead.

Yet there is little evidence that other, less wilful individuals do follow their lead. Most local and regional bodies are doing poorly when compared with this best practice; it is highly unusual to find effective and sustained local authority action on some aspect of fuel poverty without the involvement of a Wilful Individual.

The implication of this is that, unless the context for action changes or there is a sudden influx of extra Wilful Individuals into local and regional bodies to work on fuel poverty, the quality of local and regional action on fuel poverty will not significantly improve, however much best practice is documented and promoted.

4 Beyond 'best practice' – securing more 'good enough' practice?

A central approach of programmes to improve local and regional action on fuel poverty has been that improvement can be driven by exposing others to this 'best practice' and encouraging its replication. Yet there is no real evidence of a 'snowball' effect as others seek voluntarily to replicate this best practice. It is certainly not the case that the best practice of 10 years ago is now the norm.

This may be because many of the best practice cases actually represent the impressive summit of perhaps 15 or 20 years of sustained activity. Such best practice therefore appears way beyond the reach of someone looking to improve their own practice; it may actually demotivate rather than inspire.

Or it may be because best practice case studies often start quite a long way along the path towards their achievements and fail to show the early steps in the process – most particularly how to create the conditions in which action is permitted and resourced.

Best practice tends not to document the incremental steps required over time to move from 'weak' practice to 'best' practice. And it does not set a benchmark of 'good enough practice' at which a local or regional body is achieving 'what is expected of them' within a national effort to eradicate fuel poverty.

There is clearly value in documenting best practice to show and celebrate what can be achieved. However, the apparently limited impact of this approach on the quality of practice of most authorities indicates that a more comprehensive methodology to improving practice may be required.

4.1 The focus for policy: creating a context in which the less wilful can act

The focus of policy options identified in this study is therefore on creating conditions at local and regional level which enable and encourage less dogged, less wilful, but still professionally competent individuals to achieve much more.³

This theme is examined in more detail later. Beforehand, and guided by the examples set by the Wilful Individuals of what can be done, it is important to identify more precisely the opportunities for action at local and regional level to act on fuel poverty.

3 While still allowing the Wilful Individuals to flourish and innovate.

5 Defining opportunities for local and regional action

In Section 2 above, we examined briefly some of the policy and service delivery domains which are relevant to the eradication of fuel poverty and which have local and/or regional dimensions:

- Housing policy, strategic oversight, inspection and direct management (social, private rented, and owner-occupier)
- Energy efficiency standards for new and existing dwellings (and their enforcement)
- Renewal and regeneration programmes
- Planning policy for affordable housing and for buildings integrated renewables
- Social services (care provision and independent living)
- Primary care health services
- Welfare rights advice and benefits provision (e.g. Council tax benefit, housing benefit, free school meals)
- Energy advice delivery
- Engagement with energy supplier energy efficiency programmes and Warm Front (particularly via referral systems and integrated grant programmes)

There are also broader strategic opportunities (for example, through Local Area Agreements, the Community Plans of Local Strategic Partnerships, stand alone fuel poverty or affordable warmth strategies, and Public Service Agreements) to make a local commitment to eradicating fuel poverty and provision of affordable warmth. These can have the important effect of aligning priorities between a number of key local stakeholders (eg health sector and local authority) – and indeed between different individual departments and functions within a local authority.

However, with the exception of Warm Front, none of these domains has the alleviation of fuel poverty as a specific objective. Nor do they carry a requirement to take action which will explicitly address it. A focus on fuel poverty therefore tends to rely on the intervention and action of Wilful Individuals.

For example, within the housing policy and management 'domain', the Decent Homes Standard (DHS) requires local authorities to ensure that all social housing can provide a reasonable degree of thermal comfort with efficient heating and minimum insulation levels. However, while there is encouragement from ODPM for local authorities to go beyond these minimums, there is no requirement to ensure that every social sector home can be heated *affordably* and the standard itself does not stipulate this benchmark for eradicating fuel poverty.⁴

The DHS creates an opportunity to focus local strategies on the achievement of affordable warmth in all social sector housing. And a number of local authorities, principally those with active Wilful Individuals, are taking this opportunity to drive much higher thermal efficiency standards that will ensure affordable warmth in all properties. This typically involves linking in planned expenditure with energy supplier Energy Efficiency Commitment (EEC) funds and other programmes, putting in place programmes to tackle 'hard to treat' properties and,

4 Since the DHS is the government's chosen policy vehicle to deliver fuel poverty targets within the social housing sector in England, the failure of the standard to require, explicitly, *affordable* warmth can be considered a weakness. At present, local authorities and RSLs seem to be expected to rectify this weakness through their own additional actions. The Government rejected calls to include a SAP 65 standard within the DHS, the level deemed sufficient at the time to minimise fuel poverty risk. This seems anomalous given the use of this target for properties improved through Warm Front. Precedent also exists with the Welsh Assembly's inclusion of SAP targets within the Welsh housing quality standard.

in some cases, extending the approach to private sector housing. But the DHS does not ensure that this will happen.

The same may be true of the Housing Health and Safety Rating Scheme (HHSRS) when it comes into effect to replace the fitness standard in April 2006. Its inclusion of 'damp and mould' and 'excess cold' as housing hazard categories provides an opportunity to drive action to tackle fuel poverty, particularly in the private rented housing sector (including HMOs). And there will undoubtedly be some local authorities who succeed in using this new scheme as another tool to address fuel poverty.

However, there is no guarantee that the approach taken by local authorities to the HHSRS will consider fuel poverty (which requires some assessment of the household's needs and income) or deliver responses which adequately address the affordability of keeping the property warm enough for its current or potential future occupants.

It is no different at a regional level. Regional Housing Strategies, produced by Regional Housing Boards, are required to consider the provision of affordable housing but not required to consider affordable warmth (even though this is a key component of the affordability of housing if running costs as well as purchase/rental costs are considered).

Again, through the action of one or a few Wilful Individuals (witness Yorkshire and Humberside's Regional Housing Strategy) funded by regional programmes of EST or NEA, the opportunity can be taken to integrate fuel poverty objectives into the Strategy and thus to assert different priorities for the use of available housing funds.

A similar analysis can be undertaken for each of these policy and service delivery domains. It shows that there are ways in which they can be developed and delivered at local and regional level to ensure that they play a much fuller part in eradication of fuel poverty. Indeed, documenting these opportunities for action is a key objective of this paper.

However, the fact that these opportunities for action exist does not mean that local and regional bodies are necessarily taking them. And our contention is that it currently requires the presence of a Wilful Individual to ensure they are taken.

It also does not mean that there is a clear picture of what represents 'good enough' practice in how to take these opportunities.

5.1 Introducing the Local and Regional Fuel Poverty Action Matrix

In order to define more clearly the opportunities for local and regional bodies to tackle fuel poverty – and to establish yardsticks to measure the quality of such performance – the project team has developed the Local and Regional Fuel Poverty Action Matrix. It borrows directly from the approach developed for the CCPR study for carbon management.

The 'Matrix' draws out the levers and types of action available to local and regional bodies to address fuel poverty, principally within the domains listed above. It then defines four levels of performance quality associated with each lever – as 'weak', 'fair', 'good' and 'excellent'⁵ – and describes the behaviour which corresponds with that level of

5 These categories mimic the terminology which has been used by the Audit Commission in its Comprehensive Performance Assessment (CPA) system for assessing local authorities. In fact there are five categories used in CPA but the lowest grading, 'poor', is generally considered so dreadful that, in the context of fuel poverty, it would represent actions akin to the wilful withdrawal of heating provision or benefits payments. The 'poor' to 'excellent' terminology has recently been replaced by a star rating system (0 – 4 stars) for easier public understanding; these correspond, by and large, with the original five categories.

performance. In general 'excellent' has been defined to capture (roughly) current examples of best practice where they are known to the project team.

By detailing behaviours at each level of performance, the Matrix provides not only a sense of the opportunity available but also a picture of the incremental steps involved in improving performance. It therefore has the potential to act as both a yardstick to measure performance and a guide to improve it. It can also guide national policy makers in terms of what they could potentially expect of local and regional bodies in response to national policy initiatives.

Currently a relatively unsophisticated draft in need of further refinement, a similar Matrix approach to local and regional actions on carbon management was welcomed by stakeholders consulted during the CCPR study as a potentially effective performance assessment tool.

In reviewing the Matrix in its current draft, it is worth considering the following questions:

- Is there anything missing from the levers as things currently stand?
- Are there things which are happening somewhere in England which are not captured?
- Are there behaviours described which are not currently possible or no one is doing? (i.e. does this accurately capture the range of opportunities available to local and regional authorities to act?)
- Do the levels of performance 'read down the page' on a reasonably consistent basis? (i.e. do most of the 'fair' level behaviours tend to go with one another and/or are they consistent?)
- What other (possibly new) levers/powers should be considered which aren't covered here?

While it is tempting to simplify the Matrix, there is a risk that doing so would hide the full range of options open to local and regional bodies to take action within their existing policies and service delivery domains. It would also assume a reasonable level of understanding and knowledge about fuel poverty and the wide range of potential actions; such a level of understanding is likely to be absent amongst the very local and regional bodies whose performance can most improve.

The key areas for local and regional action

The Matrix provides an extensive range of possible actions by local and regional bodies to contribute effectively to the national objective to eradicate fuel poverty. Within this, we have identified five areas which we believe represent the domains where this contribution can be most significant:

Housing: Decent Homes Standards, own and social housing stock and plans for use of Housing Health and Safety Rating System in the private sector.

Grants: Integrating own grant funding with energy supplier EEC funding and Warm Front to improve targeting, fill in funding gaps where national entitlement rules fail to capture all genuine fuel poor households (potentially through effective sub-regional partnerships of local authorities).

Coordination Principally at sub-regional (eg 'county') levels, partnering with other local authorities, local energy agencies, health and social services, advice providers, to establish effective referral systems and sufficient critical mass for negotiating effective local funding and comprehensive delivery.

Benefits take-up and advice: With particular emphasis on increasing take-up of benefits which both increase income and act as 'passports' to funding (Warm Front and EEC) to improve thermal performance of housing.

Regional public health and housing strategies: To reflect fully the importance of high standards of affordable warmth in the provision of affordable housing and effective public health.

5.2 The Local and Regional Fuel Poverty Action Matrix

FUEL POVERTY: LOCAL					
LEVEL	LEVER	<i>Weak</i>	<i>Fair</i>	<i>Good</i>	<i>Excellent</i>
District/unitary	OVERALL APPROACH	No real engagement with fuel poverty	Some public commitment to concept of affordable warmth/fuel poverty but limited action or strategic engagement	Senior strategic and political engagement with fuel poverty with resourcing, 'champion' with power to act and effective internal and external partnerships	Full engagement with effective cross-dept action, relevant strategic commitments, and several active staff
	Strategic engagement and resourcefulness	Minimal attention to fuel poverty within corporate plans and strategies	Broad commitment to importance of fuel poverty but no clear plan of action or resourced programme	Clear strategic focus on fuel poverty with resourced programme for achieving targets. Affordable Warmth Strategy developed a feature of Community Strategy and LSP activity, with measurable targets for achievement. Understanding and use of range of powers [wellbeing, Private Sector Housing Renewal Strategy (PSHS), Decent Homes Standard (DHS) etc] and potential of effective partnerships	As 'good' plus clear plan for achieving UK Fuel Poverty Strategy targets for FP eradication with local authority taking responsibility for leading delivery within community
	Local Area Agreements (LAAs)	No reference made to affordable warmth.	Reference made to affordable warmth but no clear sense of how LAA will address.	Affordable warmth strategic objectives integrated into LAAs	Affordable warmth 'stretch' targets incorporated within LAAs
	Planning policy	Limited plans for affordable housing and no reference to affordable warmth within this.	Plans for affordable housing include explicit reference to affordable warmth	Plans include provision of integrated renewable and high insulation standards for affordable housing (social and private), with implications for affordable warmth analysed and considered.	Plans include provision of extensive zero heating/cooling affordable housing (social and private)

FUEL POVERTY: LOCAL					
LEVEL	LEVER	<i>Weak</i>	<i>Fair</i>	<i>Good</i>	<i>Excellent</i>
District/unitary (cont.)	HOUSING Own stock management	No assessment of fuel poverty status of tenants. Limited SAP data analysis for properties	SAP data analysed for properties with plans to improve (but no strategic consideration of affordable warmth therein)	SAP data analysed with clear picture of impact on heating costs and fuel poverty. Target for improvement based on funds available rather than fuel poverty eradication. Some provision for HTT	Improvement plan based on SAP-driven affordable warmth analysis to 'fuel poverty-proof' homes for future tenants, with funding strategy in place. including full provision for HTT. Plan integrated with PSHRS
	HOUSING Own stock transfer activities	No focus on affordable warmth as factor in transfer planning	Affordable warmth a factor within stock transfer, with options considered to improve thermal efficiency but without clear SAP target framework or prioritised programme	Affordable warmth targets integral to stock transfer planning, with SAP target set (eg SAP 65) to secure affordability and spending plans to achieve this.	Comprehensive, funded programme to eliminate fuel poverty in stock and 'fuel poverty proof' stock for all future tenants, together with commitments to provide support and advice to tenants on ongoing basis
	HOUSING Social housing sector DECENT HOMES	Planning to meet Decent Homes Standard. Minimal liaison with RSLs in area	Some attention to thermal properties in building but no integration with affordable warmth activities or programmes and no strategic approach to delivery of targets or priority actions	Set clear affordable warmth standards that considerably exceed DHS, with clear programme for achievement and spending prioritised accordingly. RSLs integrated into local strategy for improving social housing (including provision of information on progress)	As good plus strategy to apply same standards to all housing in district
	HOUSING Private sector housing Private Sector Housing Renewal Strategy (PSHRS)	Minimal PSHRS, minimal grants provided and long waiting lists for those that do exist. No clear plans as to how DHS for vulnerable groups will be achieved.	Basic PSHRS in place with some grants provided and fairly lengthy waiting lists. Programme in place for achieving DHS 70% target for vulnerable households.	Clear PSHRS in place with generous grant programme, short waiting times; specific grants allocated for EE improvement. Programme for achieving DHS for vulnerable households before national target dates	Good plus integration of PSHRS with social housing improvement programme (common contractors etc). Programme in place to meet DHS for all vulnerable households by 2010.
	HOUSING Private sector inspection Housing Health & Safety Rating System (HHSRS)	No sense of fuel poverty or affordable warmth as appropriate consideration in inspection	Some attention to thermal properties efficiency in buildings but no integration with affordable warmth activities or programmes	LA already using HHSRS to meet Affordable Warmth objectives. Strong licensing regime with Affordable Warmth integrated and referral to grant schemes in event of failure	<i>Difficult to define, as HHSRS has not yet come into effect. Integrate with health sector to ensure cross-referral system and common targeting rationale for HHSRS and follow-up support</i>

FUEL POVERTY: LOCAL					
LEVEL	LEVER	<i>Weak</i>	<i>Fair</i>	<i>Good</i>	<i>Excellent</i>
District/unitary (cont.)	HOUSING Home Energy Conservation Act	Officer has HECA responsibility among other duties but low priority. Minimal reporting of FP activity.	F/T HECA officer in place (or senior officer partly responsible for HECA) with some influence over housing activities. Descriptive account of FP activity in area	HECA officer has considerable influence over housing and non-housing activities. Integration of LA-wide Affordable Warmth Strategy into HECA process. CSE's FPI or similar used to report on extent of FP.	As good, plus influence over other non LA agencies. Integration of multi-agency Affordable Warmth Strategy, led by Council, into HECA process. FP data (through high quality survey or Warm Zone-style assessment process) reported.
	Regeneration / economic development schemes	No use of regeneration funds for affordable warmth work.	Opportunistic use of regeneration funds used for some affordable warmth improvement works (e.g. end of year under-funds)	Integration of affordable warmth improvement programmes with regeneration strategy and priorities. Strategic approach to use of EEC, social housing funds etc to provide match funding for regeneration programmes targeted at affordable warmth	Good plus, extensive fuel poverty training and employment schemes, aligned with affordable warmth improvement programmes
	Building regulations enforcement	Little attention to Part L in building control activities	Part L assessment within building control but not high priority within enforcement	Part L assessment within building control a priority focus of enforcement activity	Systematic assessment and review of Part L aspects of plans and enforcement review of actual construction
	Energy advice provision	Occasional distribution of EEAC materials	Distribute EEAC materials regularly and modest funding (<£5K)	Consistent support and engagement with local EEAC including funding, joint promotions, own staff training	As 'good' plus clear policy of training and supporting front-line staff in energy efficiency advice and signposting
	Income maximisation and benefit/grant administration	Little welfare rights advice. Assessed as weak by CPA for benefit administration. Little integration with private sector home improvement grants (if any provided)	Some welfare rights advice, minimal debt and financial advice. Assessed as 'fair' for CPA requirements for benefit administration. Some links with private sector home improvement grants.	High quality advice sector (welfare rights, financial, debt), including integration of EE advice. Cross referral systems in place, including feedback loops for referral back into WF and LA grants. Assessed as 'good' for benefit administration. Good links with administration of home improvement grants	As good, plus multi-benefit assessment system in place (including home improvement grants), backed up with extensive high quality advice provision (in-house and external).

FUEL POVERTY: LOCAL					
LEVEL	LEVER	Weak	Fair	Good	Excellent
District/unitary (cont.)	Grant and e.e. delivery schemes (EEC, Warm Front etc)	Minimal advice or referral to Warm Front (WF). Little use made of EEC.	Some advice given and some referrals to WF. Some use of EEC but limited integration with mainstream social housing and private sector renewal schemes.	Wide range of mechanisms to promote take-up of WF, including promotion to HB/CTB recipients, referral through front line staff, use of HHSRS to 'trigger' referrals. Extensive integration of EEC to social housing improvement and of WF to private sector renewal (including funding of pre-WF remedial measures).	Systematic identification of WF eligible households through Warm Zone-style assessment process. Full integration of schemes to ensure 'whole house' solutions and seamless service to recipients.
	Monitoring and reporting	Basic HCS carried out with no FP data. Social housing monitoring carried out to meet basic legislative requirements. No data supplied to NROSH. AWS unlikely to exist, therefore no monitoring.	Good quality HCS undertaken but FP data not collected. Social housing stock monitoring carried out but FP data not collected and not integrated with HCS data. Social housing data supplied to NROSH but not at level of individual properties. Reference made to health indicators. If AWS in place, reference made to housing information but not fully integrated into tracking progress on AWS. Limited PIs in place for monitoring non housing elements of AWS.	Integrated social and private sector property database (DB) with SAP data and active use of DB for tracking progress. Good quality HCS, inc FP information; allows comparison with EHCS FP data within reasonable confidence levels. Social housing data supplied to NROSH to full specification. Regular cross reference of housing and health indicators. Robust plans for monitoring progress on non housing elements of AWS. Monitoring information used extensively to track progress and inform regular evaluation of AWS.	Good plus, detailed property DB for all sectors (SAP, hard to treat and FP status), with regular updates and systems in place for tracking progress on AWS. DB negates need for HCS; FP data allows comparison with EHCS FP data on narrow confidence levels. Detailed set of quantitative and qualitative PIs in place for monitoring progress on non housing elements of AWS.
County/sub-regional partnerships (also Unitary)	Social services	No strategic or practical engagement with fuel poverty as an issue with a social care dimension	Practical engagement of staff through partnerships (eg Affordable Warmth) in specific programmes but piecemeal and not strategically considered	Clear strategic engagement with fuel poverty and potential role of social services in problem identification and referral systems. Practical engagement with local schemes and commitment to staff training.	As 'good' with 'proactive' systems for referral and 'client' tracking to maximise take up of grants, programmes and benefits. Systematic and sustained approach to staff training in fuel poverty issues and their potential role in solutions

FUEL POVERTY: LOCAL					
LEVEL	LEVER	<i>Weak</i>	<i>Fair</i>	<i>Good</i>	<i>Excellent</i>
County/sub-regional partnerships (also Unitary) (continued)	Engagement with health sector (Primary Care Trusts) (NB Refers to local authority activity which triggers health sector involvement)	No effective engagement with health sector	Identified PCT contact with engagement within local or sub-regional affordable warmth partnership or similar. Some health sector participation in programmes, but piecemeal and no strategic commitment secured in PCT	Active engagement with PCT at strategic level (eg through LSP) leading to integration of relevant health staff into fuel poverty referral schemes and training	Routine and effective co-ordination with health sector including integration of local fuel poverty initiatives into health staff activities and training with easy referral schemes with tracking and information sharing. Combined communications to target vulnerable (eg flu clinics, pharmacists)
	Co-ordination of district-level activity and technical advice/support	No effective co-ordination between districts	Erratic engagement with sub-regional co-ordination, mainly reactive to third party efforts (e.g. LASP)	Active engagement with LASP programme/HECA fora, with sharing of technical advice and support and joint development of schemes (EEC, other grants) and strategies	Strong partnership approach across the sub-region with clear strategic goals and action plan to delivery them

FUEL POVERTY: REGIONAL					
LEVEL	LEVER	<i>Weak</i>	<i>Fair</i>	<i>Good</i>	<i>Excellent</i>
REGIONAL	OVERALL APPROACH	No real sense of regional role on fuel poverty	Regional action taking place but without reflection in key regional public health and housing strategies	Regional strategies reflecting fuel poverty objectives with clear action plan to realize objectives	Full engagement at regional level on fuel poverty with clear strategic approach to delivery and effective co-ordination of local action
	Regional Housing Strategy	No explicit engagement with fuel poverty aspects of housing policy or spending priorities.	Fuel poverty acknowledged as relevant issue for consideration in housing but little reflection of this within strategy or priorities	Basic SAP targets for affordable warmth with some analysis of what is required to meet them	SAP targets for affordable warmth plus clear and prioritised investment programme to meet target within deadline
	Regional Public Health engagement	No acknowledgement that fuel poverty is a factor to be considered in public health planning	Acknowledgement that fuel poverty (or cold homes) is an influential factor in public health.	Regional fuel poverty data and implications for public health clearly analysed and reflected in regional public health strategies, with encouragement for greater engagement with affordable warmth programmes	Clear sense of priority given to public health implications of fuel poverty with action programme for involvement of public health sector at regional and PCT levels within affordable warmth programmes and spreading of good practice
	Regional Sustainable Development Framework	No acknowledgement of fuel poverty as sustainable development issue	Fuel poverty included in broad sweep of social issues but no implications for policy drawn out	Demonstrable understanding of the implications for policies and practices of problem of fuel poverty	Clear commitment to considering current needs for affordable warmth as part of coherent SD framework
	Regional Affordable Warmth or Fuel Poverty Strategy	None	Strategy developed which mimics national objectives but no real action plan to deliver and limited buy in from key regional players	Well-supported strategy with targets and clear sense of how fuel poverty objectives integrate into range of regional activities and priorities	Clear, well-supported strategy with action plan based on regional evidence and appropriate institutional focus on delivery
	Regional Spatial Strategy	No acknowledgement of fuel poverty or link to planning for affordable housing or buildings integrated renewables	Limited promotion of buildings integrated renewables in new build (thus lowering running costs for occupants), including affordable housing elements	Housing planning defining affordability with affordable warmth in mind. 10% on-site renewables target for new build housing developments (above 10 homes)	As good plus aim of delivering affordable warmth in all new housing and explicit requirement for on-site renewables target to apply equally to new affordable housing.

FUEL POVERTY: REGIONAL					
LEVEL	LEVER	<i>Weak</i>	<i>Fair</i>	<i>Good</i>	<i>Excellent</i>
REGIONAL	Regional economic development		Recognition of social exclusion as economic factor which should be addresses	Active consideration of potential for infrastructure projects (eg gas extension, district heating, CHP etc) to address fuel poverty	Affordable warmth seen as regional economic issue with clear linkage to housing, planning and public health strategies and commitment of funds to support specific initiatives
	Skills & sector development	No recognition of range of skills and training requirements associated with addressing fuel poverty	Acknowledgement that fuel poverty targets have implications for sector and skills development but limited analysis of actual skills requirements or training needs	Need to address fuel poverty considered within sector and skills thinking, particularly insulation/building and plumbing trades; limited assessment of training needs or current provision	As 'good' but with comprehensive picture of training needs, current provision and clear plan to ensure sustained availability of adequate skills to meet strategic targets on fuel poverty
	Co-ordination of sub-regional activity and national funding streams	Limited co-ordination through EEACs and HECA forum but no sense of regional role	Value of regional activity acknowledged and some resource provided but no clear action plan or stakeholder buy-in	Strategic approach to regional activity on domestic e.e. and fuel poverty with stakeholder buy-in, appropriate resources and clear locus for action	Regional co-ordination of domestic e.e. and fuel poverty activity and funding, supporting appropriate delivery of advice and support at local, sub-regional and regional level

6 Securing improvement in performance by local and regional bodies

The Local and Regional Fuel Poverty Action Matrix shows that there are many opportunities for local and regional bodies to take action to contribute to the eradication of fuel poverty. It also shows that, within the range of possible responses to these opportunities, local and regional bodies could do virtually nothing - or they could play a significant role.

As discussed in Section 3.1, in the current context for local and regional action on fuel poverty, it takes a Wilful Individual to deliver good or excellent performance. There are few consequences of inaction for a local or regional body since there are no requirements to act.

It was beyond the scope of this study to examine the additional impact on the incidence of fuel poverty by a local authority or regional body improving its performance from, say, 'weak' to 'good'. However, the available evidence of impact in local authorities delivering some or many aspects of 'excellent' behaviours would suggest that the gulf between 'weak' and 'excellent' is significant.⁶

It is therefore highly probable that improving the quality of performance by local and regional bodies would make a significant contribution to national efforts to tackle fuel poverty. Indeed, it is arguable that without such improvement national efforts will fall short of their targets.

The question now is: what policies and programmes are needed in order to deliver that level of performance improvement?

Within current powers and resources, there are already some local authorities achieving excellent performance on some aspects of fuel poverty and more which are reaching 'good enough practice'. It is therefore not immediately obvious that further powers are required to stimulate improvement (or that further powers would have the effect of stimulating improvement in the absence of a Wilful Individual).

Revisiting the analysis of Section 3.1 on the role which the Wilful Individual has played to date, the key challenge for the future is to create conditions within which less wilful individuals will be able to improve performance without having to sustain quite the same levels of personal commitment, drive and determination as their wilful counterparts.⁷

The policy-making focus should therefore be on policies, mechanisms and programmes which can mainstream activities to tackle fuel poverty for local and regional bodies by driving, encouraging and supporting performance improvement.⁸

6 For example: Impetus and ACE (2003), *A review of English local authority fuel poverty reports and strategies*, Eaga PCT; Baker W & Preston I (2004), *North East affordable warmth scoping study*, CSE; CSE & NEA (2006), *Warm Zones external evaluation: final report*, EST

7 As mentioned in Section 3.2, it is also important that the new policy context continues to provide opportunities for Wilful Individuals to flourish and innovate.

8 The same focus emerged for the CCPR study in relation to improving performance on carbon management and was the subject of discussion with expert stakeholders representing local authorities and regional bodies and with that study's cross-departmental steering group (DTI, Defra, ODPM, DfT, EST, Carbon Trust). The conclusions drawn from those discussions and based on a strong consensus are, we believe, directly transferable to the issue of fuel poverty.

The emphasis needs to be on ensuring that fuel poverty moves significantly up the agenda of local and regional bodies so that it gains senior management and political attention and where failure to improve performance has an impact on their priorities and finances.

As indicated above, this is less about providing additional powers or opportunities to act and more about building the importance of fuel poverty into the mechanisms and tools which currently determine local and regional priorities, most particularly Comprehensive Performance Assessment and national government guidance.

Overall, we have identified six key priorities for national policy to drive improvement in local and regional performance on fuel poverty. These should be considered as a package:

- The introduction of fuel poverty into Comprehensive Performance Assessment (CPA) for local authorities (tied to a legal duty to address fuel poverty) and into equivalent priority setting and assessment processes for regional bodies.
- Clear and explicit guidance from national Government on what it expects from local and regional bodies in relation to fuel poverty, how these integrate with existing activities (e.g. housing management, local advice provision etc) and how they align with national policies and programmes.
- An affordable warmth-driven SAP target within the DHS, in common with Warm Front, and alignment of the DHS private sector 'vulnerable households' target with that of the Government's Plan for Action on Fuel Poverty in England.
- An explicit challenge (potentially a requirement) to Warm Front Scheme managers and energy suppliers (in relation to their EEC Priority Group activities) to improve their engagement with local authorities (or appropriate regional co-ordinating functions) to maximise the opportunity for integration of assistance programmes which can benefit fuel poor households.
- Training, support and co-ordination – to build skills and competencies, support organisational change and strategy development to reflect fuel poverty priorities, enable sharing of resources and experience (and avoid duplication), provide appropriate technical advice, and simplify funding streams.
- Standard monitoring, evaluation and reporting methodologies and the provision of high resolution data on the local incidence of fuel poverty, insulation and heating improvement activities, and benefit take-up, to enable the development of an evidence base of costs and impacts of action and improved targeting of programmes that contribute towards the eradication of fuel poverty.

These are outlined in more detail below.

6.1 Putting fuel poverty into Comprehensive Performance Assessment (CPA), tied to statutory duty to address fuel poverty

CPA has been highlighted by local authority officers as a powerful motivator for senior management and local politicians to give an issue higher priority. The CPA process – which grades local authorities as poor, weak, fair, good or excellent (or 0 - 4 stars) and ties overall results to funding – can ensure an issue receives at least some senior attention and 'asks the question'. It therefore has strong potential to

create conditions in which local authority leaders will be looking to enable less wilful people to be more effective in tackling fuel poverty.

The Audit Commission, which undertakes the CPA, indicated to the project team for the CCPR study that such an approach will only have significant impact if it is tied to a statutory duty (eg in this case, 'to address fuel poverty') – since this will give their audit greater teeth and the consequences of failure will be more significant.

Bearing in mind that the incidence of fuel poverty is partly determined by fuel prices and income levels achieved from means-tested benefits, it may be unreasonable to establish a specific fuel poverty reduction target for local or regional bodies as part of the CPA process. These bodies do not have sufficient control over all the factors which impact on fuel poverty.

A more productive approach might be to establish a performance improvement target based on the Matrix approach, which contains clear behavioural indicators for each of the different grades of performance with the potential to be 'evidenced' for assessment purposes. Tying the CPA process to some version of the Matrix would also draw attention to the steps involved in improvement.

The advantage of this Matrix approach to CPA is that it requires local and regional bodies to tackle fuel poverty on a cross-cutting basis, ensuring that it features as a higher priority across all of the relevant policy and service delivery domains.

Within the framework of CPA – as recently developed and used by the Audit Commission for single tier and county councils and now being consulted upon for District Councils – the role of fuel poverty would potentially fit within all five 'achievement' priority areas for the corporate assessment: sustainable communities including transport; safer and stronger communities; healthier communities; older people, and; children and young people. It should also feature strongly in the specific service assessment for housing, benefits, social care, and children and young people.

Indeed, it is important that fuel poverty does 'cross cut' CPA in this way and thus becomes an integral consideration in mainstream delivery of these services, rather than be treated as a 'bolted on' added extra.

The Matrix approach would also enable the Audit Commission to make its assessment of 'direction of travel' in terms of level and rate of improvement by a local authority.

6.2 Clear guidance and explicit expectations for local and regional action

The Government needs to make more explicit within its Fuel Poverty Plan for Action what it expects local and regional bodies to do to contribute to the national strategy to eliminate fuel poverty. This guidance is currently lacking, leaving local and regional bodies without a national framework within which to play their part. In the absence of a Wilful Individual, these authorities will struggle to develop coherent approaches (even if a CPA-based approach ensured they were bothered to struggle). National guidance will be crucial to a truly nationwide programme of effective local and regional action.

The Government should also ensure that there is more explicit reference to fuel poverty and appropriate local and regional action within national guidance for related policy and service delivery domains – from housing management and benefits

provision to public health and social care. A more refined and tested version of the Matrix could potentially provide a framework for such guidance.

6.3 Decent Homes Standard with adequate SAP target for affordable warmth

The Decent Homes Standard does not currently provide sufficient clarity on the levels of thermal efficiency and comfort which must be achieved in social housing. The success of the standard in the genuine alleviation of fuel poverty is therefore reliant on the informed and wilful to overlay their own analyses of how it can be used to eliminate fuel poverty.

This could be rectified by the adoption of an affordable warmth-linked SAP target to provide clear and unambiguous direction to local authorities, together with guidance (see 6.2) on how to address the task, analyse stock needs and establish funded improvement plans. The level of the SAP target (eg 'at least SAP 65') may need to reflect regional climatic differences within England (since, for example, the North East is colder than the South West) and also take account of anticipated fuel prices and likely income levels and their impacts on affordability.

6.4 Improving local/regional engagement by national programmes

There is varied interest and ability amongst energy suppliers to engage with local authorities – particularly smaller district authorities – with regard to the suppliers' EEC programmes. This reduces the potential for local authorities – or schemes supporting them on a sub-regional level (like the EST's Local Energy Support Teams) – to integrate the various sources of funding (including their own) and the delivery of energy efficiency and heating improvements. This is particularly important because the schemes and funding have different purposes (for example EEC does not explicitly carry a fuel poverty objective).⁹

Yet it is only by achieving such integration (as achieved, for example, in the Gloucestershire and Somerset Warm & Well schemes) that a comprehensive service is delivered for all fuel poor homes as opposed to those homes defined principally by benefit or income status.

With increased pressure from other policy recommendations outlined here, it is likely that local authorities individually or collectively will seek engagement with energy suppliers and Warm Front to enable such integration at a local level. An explicit challenge to (or even 'requirement of') energy suppliers and Warm Front's Scheme Manager, Eaga Partnership, to improve their engagement with local authorities – potentially through sub-regional or regional co-ordination – would ensure that the doors are open when local authorities approach.

6.5 Training, support and co-ordination

Local and regional bodies will need assistance to improve their performance, even in the context of performance assessment and clearer guidance. There will need to be activity to build skills and competencies to reflect fuel poverty priorities, to enable

⁹ The lack of a fuel poverty objective in EEC means that its application and targeting is not necessarily on the fuel poor. This is not a criticism of EEC or energy suppliers as such. More it is a recognition that the lack of objective means that the use of EEC resources as a funding/installation scheme which can be used to assist the fuel poor is likely to require additional intervention by, for example, local or sub-regional bodies to integrate its application with other sources of funding/activity which are more targeted at – and designed for – fuel poverty eradication.

sharing of resources and experience (and avoid duplication), provide appropriate technical advice and simplify currently fragmented funding streams.

There are already a number of programmes run by the Energy Saving Trust or NEA (e.g. Practical help, Local Energy Support Programme, Energy Efficiency Best Practice, Managed Housing programme, regional officer support etc) which are providing training and advice and support to local and regional bodies.

At present, there are unclear relationships between these programmes and organisations in terms of who is doing and/or funding what. It is also ambiguous the extent to which, for the EST, they have an explicit fuel poverty (cf carbon reduction) objective which is reflected in programme priorities and support.

This uncertainty is unhelpful for the local and regional bodies which need support. The EST – through its energy efficiency advice and sustainable energy centres, the Local Energy Support Programme, and its increasing involvement in regional energy policy – is providing funding for local agencies which have, or are developing, exactly the relationships, communication channels, co-ordinating functions and funding insights which are relevant to cutting fuel poverty as *well* as cutting carbon emissions.

Yet there is not a clear requirement from Defra on EST to ensure these programmes realise their potential to contribute to effective local and regional action on fuel poverty (alongside their clear requirement to work on reducing carbon emissions).

This lack of explicit drive by the EST in these programmes on fuel poverty issues may be explained by (we understand) it lacking a key performance indicator (KPI) relating to its impacts on fuel poverty or impacts on improving local and regional performance on fuel poverty.

Creating such a KPI and linking it to Defra funding and reporting would potentially correct this situation. This would give greater legitimacy to EST programmes (and more particularly the local and sub-regional organisations funded to deliver them) which are building effective local, sub-regional and regional activities on fuel poverty as well as domestic carbon emission reduction.

This is not to muddy the EST's priorities; it is simply to optimise the use of existing relationships, communication channels and co-ordinating functions and to build upon effective existing activities being carried out locally by agencies delivering EST-funded programmes.¹⁰

Beyond this, there is a need for the various existing programmes to move beyond simply encouraging the reporting and replication of best practice. Such an approach tends to provide additional insight and opportunity for already 'good' and 'excellent' authorities. However, it does little for the currently underperforming. Existing support programmes may have far greater impact if they focused on driving performance improvement towards 'good enough practice' amongst 'weak' and 'fair' local authorities; this is where there is actually most to gain in terms of additional impact on fuel poverty.

10 An alternative approach might be to provide NEA with funding to enable it to fund, EST-like, these same local and sub-regional organisations to use the relationships they already have (often by virtue of their current EST-funded activities) to deliver on local and regional fuel poverty objectives.

The Matrix (or preferably a more refined version of it) again provides a potential framework for guiding performance improvement with active support from these programmes.

It is not clear that there is a comprehensive understanding of training needs across all the policy and service delivery domains which have an influence on fuel poverty. This is needed, together with a lead national agency to ensure appropriate training and support is delivered to establish the knowledge, understanding and skills to integrate fuel poverty into the wide range of relevant existing activities (including health and caring services, benefits and other support agencies etc).

Fuel poverty should also become a central aspect of all local authority and regional body staff and professional training – so that the implications for fuel poverty and the need for affordable warmth of all management and service delivery decisions becomes a routine consideration.

6.6 Standardised methodologies for evaluation, reporting and data provision

There is currently no standard methodology for evaluating the impact of programmes on fuel poverty, be they national, regional or local in scale.¹¹ Nor is there a standardised approach to reporting on local and regional activities to tackle fuel poverty. Rectifying this would provide a clearer basis for comparing performance and understanding the impact of different types of programmes and actions at local and regional level.

Data on the regional incidence of fuel poverty is provided through the English House Condition Survey but it is not available at lower resolution. The local Fuel Poverty Indicator developed by CSE and the University of Bristol is currently being updated with funding from DTI, Ofgem, Eaga PCT and Energy Retail Association (due mid 2006). The Fuel Poverty Indicator will indicate how the EHCS-measured fuel poverty is distributed across England at small area level (eg super output area). The provision of this data, together with guidance on how to interpret and apply it, will enable improved targeting of programmes.

This data will be even more valuable if it can be combined with information about activities undertaken to improve the thermal efficiency of dwellings on an area by area basis. This should be available through the EST's HEED database (provided that information from EEC suppliers and Warm Front is submitted on a timely basis).

There is also potential to use future Home Condition Report (HCR) data and other energy survey data (eg EST home energy check advice survey data) on a local and regional basis to understand better the precise thermal condition of the local housing stock and enable prioritised improvement programmes to be developed. It is, however, not yet clear whether local authorities will automatically have access to the HCR energy survey data, either through access to a national database or through local provision for incorporation into their own datasets.

¹¹ This said, the reporting required of Eaga Partnership by Defra under the latest phase of Warm Front will give a better indication of likely impact on fuel poverty than previous reporting arrangements. In addition, an evaluation methodology was developed by NEA and CSE and used in the EST-managed evaluation for Defra of the Warm Zones pilots.

6.7 Possible strategies for FPAG to work with Government to secure these improvements in policy and practice

The measures recommended here are designed to work together and reinforce one another. As a whole we believe they represent a purposeful intervention with the potential to integrate local and regional bodies fully into a unified national effort to eliminate fuel poverty.

However, in order for them to be realised, the FPAG and others will have to persuade policy makers, programme managers, funders and other key stakeholders to make changes to their existing practices. In particular, we recommend that FPAG:

- Engage with the Local Government Association and ODPM on establishing fuel poverty as a tangible cross-cutting component of CPA and introducing an appropriate duty.
- Engage with Defra, EST and NEA to establish a clear target (and potentially funding) for EST and NEA work on fuel poverty through local and sub-regional organisations (already funded to deliver EEACs and LESP) and regional programmes, building on such organisations' existing relationships and partnerships.
- Engage Defra, the Energy Retail Association and Eaga to improve the quality of engagement within EEC and Warm Front at regional or sub-regional level.
- Engage Defra and DTI and EST on access to data and standardising evaluation and reporting methodologies.
- Engage ODPM on ensuring local authority access to HCR data and EST on access to HEED and energy survey data.
- Review the specification for current best practice programmes for local authorities with view to providing more incremental guide to improvement and a stronger focus on improving performance amongst the currently weak and fair authorities.