

Plymouth City Council
Statement of Intent for ECO Flexible Eligibility
1st October 2018 Version 1.1

1. Introduction

Plymouth City Council wishes to make use of the new flexible eligibility criteria available to Local Authorities (LA) via the ECO obligation. This will enable the Council to help the estimated 15,000 households currently suffering from fuel poverty within the city. The Council will aim to identify households that may benefit from the installation of measures available under the flexible eligibility section of the obligation.

The energy suppliers or their agents/contractors make the final decision on whether a household receives an ECO measures. A declaration made by the LA to an obligated supplier does not necessarily guarantee installation of measures. The final decision will depend on i) survey carried out by suppliers agents/contractors and installation costs calculated, ii) the energy savings that can be achieved for a property, and iii) whether suppliers have achieved their targets or require further measures to meet their ECO targets.

2. Methodology for Determining Eligible Households.

The flexible eligibility element of ECO is effectively split into two groups of households: fuel poor households or low income and vulnerability to cold (LIVC) households. The Council will use the criteria below to determine if households are eligible.

Proposed Eligibility criteria

-
- a. *Criteria for identifying fuel poverty (FP) households:***
Those that meet the 10% disposable income spent on fuel poverty criteria or those that meet the Low Income High Costs (LIHC) criteria.

 - b. *Criteria for identifying low income and vulnerability to cold (LIVC) households:*** will be based on evidence that the household includes a person or persons who are in poor health or at risk of ill health, or with underlying health issues, or caring for a vulnerable person & or worried about living in a cold, damp home (e.g. low income indicators, health and vulnerability conditions)

Fuel Poor Households.

Eligibility for this will be made using the Centre for Sustainable Energy's (CSE's) Community Fuel Poverty Assessment Tool^[1].

The CSE Community Fuel Poverty Assessment Tool will be supported by two further steps to cross validate the Tool's assessment allowing marginal and non-standard households to be assessed for eligibility. In such cases, decisions will be informed by data collected to determine whether a household:

- Is on a low income; and
- Faces high energy costs.

The Council's approach for identifying whether a household is on a low income will be based on an annual maximum household income threshold (after housing and energy bills have been deducted) that will be set at £30,000.

The Council's approach for determining whether households face high energy costs will be based on the EPC rating for the property. Any property that is rated band D and below will be deemed to facing high cost. Where an EPC does not exist, assessment will be made by the responses to a list of 'high cost questions' detailed in Table I below. Once added together a higher score indicates a greater likelihood that a household faces high-energy cost and is in fuel poverty.

Question	Response	Score
How many bedrooms/ rooms being used as bedrooms are there in the home?	1	0
	2	10
	3	35
	4	55
	5	70
	6 or more	80
Are energy payments made by Direct Debit?	Yes	0
	No	15
What type of house is it?	Semi detached	30
	Terrace	20
	Flat	0
	Detached	30
What is the tenure?	Private rented	15
	Owner occupied	10
	Local Authority	5
	Registered Social Landlord	0
Is the property a holiday/ second home	Yes	Exclusion
	No	0
Does the home use a boiler/ central heating system?	Yes	0
	No	10
Is the homes boiler/ central heating system working reliably?	Yes	0
	No	10
Was the home built before 1964?	Yes	25

	No	0
What is the house construction?	Solid wall	10
	Cavity wall	0
What is the main fuel type?	Gas	0
	Electricity	30
	Coal/ Solid Fuel	25
	Other	15
Is there evidence of the damp in the home?	Yes	25
	No	0
Is there evidence of under heating of the property?	Yes	25
	No	0

Table 1^[2]: High Cost Questions

LIVC households

Households who have health conditions sensitive to cold /damp conditions will be eligible. Conditions which relate to list below would be deemed eligible, though the list is not intended to be exhaustive, and other health conditions may be eligible:

Respiratory conditions
 Circulatory conditions
 Musculoskeletal conditions
 Mental health conditions

If a situation occurs where demand exceeds the level of help available then households will be prioritised using the method below:

- **Highest priority** – those with a long term condition (LTC) sensitive to cold/damp (respiratory, circulatory, musculoskeletal and mental health) that has led to emergency attendances and/or admissions in the last 12 months.
- **Medium** – those with a long term condition (respiratory, circulatory, musculoskeletal and mental health) that has required ongoing treatment over the last 12 months.
- **Low** – those with mild and stable LTCs, or at higher risk of ill health caused by cold homes – children and older people.
- **Lowest** – no condition and not in higher risk age group.

^[1] Excel copies of this tool are at the date of publication available via the CSE Communities Team (communities@cse.org.uk)

^[2] Table based on questions developed by BEIS which are aimed at achieving a balance between simplicity and effective targeting of high cost homes tested in previous BEIS research

NB. Solid Wall Insulation projects and in-fill.

The council will seek to include SWI projects within its flexible eligibility approach. The inclusion of these will depend on the level of ECO funding available and attractiveness of this to the householder. The Council will work up detailed scheme requirements for these as and when viable opportunities become available.

3). Acting on behalf of another authority

Plymouth City Council is not currently planning on acting on behalf of neighbouring authorities. Though it is happy to consider a collaborative approach with neighbouring authorities where this would be of benefit.

4). Joint Statement of Intent

Plymouth City Council is not currently planning on issuing a joint statement of intent.

5). Governance

This Sol is signed off by Paul Barnard, Assistant Director for Strategic Planning and Infrastructure. The declarations for flexible eligibility will be signed off by:

Paul Elliott, Low Carbon City Officer
Ballard House
Plymouth
PL1 3BJ

6). Referrals

Plymouth City Council will look to utilise and develop existing referral networks with its community and health partners in order to find eligible households. Community organisations within the LA area are very well placed, and already working with, the target groups that could benefit from ECO measures. As such these will be The Council's primary source of referrals that lead to a declaration.

7). Evidence Monitoring and Reporting

Plymouth City Council will use the following data inform targeting and subsequently make declarations of eligibility:

- EPC's – The Council have approx. 75% of the city private domestic EPC's to accurately determine a property's level of energy efficiency
- Household income – The Council require the household to sign to the effect that the household income is not greater than the threshold detailed in section 2 above.
- Health conditions – Where appropriate the council will require evidence that health conditions are present in the household. This may include prescriptions, doctors notes, hospital appointments or other relevant documentation.

The Council will retain the above information in line with guidance provide by Ofgem and BEIS.

The Council will require any supplier/installer using it's declarations to provide a monthly monitoring report which outlines the status of each household in relation to the installation process.

8). Signature

A handwritten signature in black ink, appearing to read 'Paul Barnard', written in a cursive style.

Paul Barnard, Assistant Director , Strategic Planning and Infrastructure,

