

Dear Members

Cabinet

A meeting of the Cabinet will be held on **Thursday 2 September 2021 at 6.30pm** in the **Craddock Room, Civic Centre, Riverside, Stafford** to deal with the business as set out on the agenda.

Please note that this meeting will be recorded

Members are reminded that contact officers are shown at the top of each report and members are welcome to raise questions etc in advance of the meeting with the appropriate officer.



Head of Law and Administration

CABINET - 2 SEPTEMBER 2021

Chair - Councillor P M M Farrington

A G E N D A

- 1 Minutes of 5 August 2021 as circulated and published on 6 August 2021
- 2 Apologies
- 3 Councillors' Question Time (if any)
- 4 Proposals of the Cabinet Members (as follows):-

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(a) COMMUNITY AND HEALTH PORTFOLIO

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| (i) | Home Energy Conservation Act 1995: 2021 Update | 3 | - | 51 |
| (ii) | Temporary Accommodation Out of Area Placement Policy | 52 | - | 62 |

Membership

Chair - Councillor P M M Farrington

- | | | |
|------------------|---|---|
| P M M Farrington | - | Leader |
| R M Smith | - | Deputy Leader and Resources Portfolio |
| J M Pert | - | Community and Health Portfolio |
| J K Price | - | Environment Portfolio |
| F Beatty | - | Economic Development and Planning Portfolio |
| C V Trowbridge | - | Leisure Portfolio |

ITEM NO 4(a)(i)

ITEM NO 4(a)(i)

Contact Officer:	Sam Taylor
Telephone No:	01785 619253
Ward Interest:	Nil
Report Track:	Cabinet 02/09/2021 (Only)
Key Decision:	No

**SUBMISSION BY COUNCILLOR J M PERT
COMMUNITY AND HEALTH PORTFOLIO**

CABINET

2 SEPTEMBER 2021

Home Energy Conservation Act 1995: 2021 Update

1 Purpose of Report

1.1 To update the Council's Home Energy Conservation Act report for 2021.

2 Proposal of Cabinet Member

2.1 That the report be noted;

2.2 That the final report be published on the Council's website.

3 Key Issues and Reasons for Recommendation

- 3.1 The HECA return is prepared in accordance with guidance issued to local authorities under the Home Energy Conservation Act 1995. The 'Act' recognises local authorities' ability to use their position to improve the energy efficiency of all residential accommodation in their areas and requires authorities to provide information on what is being done and to report to the Secretary of State on progress in implementing related measures.
- 3.2 Historically there has been a requirement to produce a HECA report locally and to publish the updated version on the Council's own webpage bi-annually; the duty is fulfilled when a link to the report is submitted to the Department for Business, Energy and Industrial Strategy (BEIS). The previous report <https://www.staffordbc.gov.uk/home-energy-conservation-act> was published in 2019.

- 3.3 The published report sets out the Council's current performance in terms of our population and household demographics; data concerning the energy efficiency and thermal quality of our residents' homes; the relationship between these and resulting levels of fuel poverty; and our proposals to improve health, housing standards and energy efficiency in the Borough. The report sets out the actions the Council intends to take to continue improving the energy efficiency of residential accommodation in the area.
- 3.4 The updates for the HECA Report 2021 have been completed with close regard to the Council's objectives as detailed in the Corporate Business Plan 2021-2024; the Climate Change and Green Recovery Strategy 2020-2040 and the emerging Local Plan review.

4 Relationship to Corporate Business Objectives

- 4.1 To improve the quality of life of local people by providing a safe, clean, attractive place to live and work and encouraging people to be engaged in developing resilient communities that promote health and wellbeing.
- 4.2 To tackle Climate Change by implementing our Climate Change and Green Recovery objectives.

5 Report Detail

- 5.1 In 2019 and 2021, BEIS have preferred to collect home energy efficiency information via a template, with the Council's responses to questions on a range of key themes being submitted via a reporting system online. The themes are:
- Headline and Overview
 - Communication
 - Local Green Supply Chain
 - Social Housing
 - Private Rental Sector (PRS) Minimum Energy Efficiency Standards
 - Financial Support for Energy Efficiency
 - Fuel Poverty
 - Green Homes Grant: Local Authority Delivery
 - The Energy Company Obligation (ECO)
 - Smart Metering
- 5.2 All questions are optional but, responses to all are highly encouraged. Local authorities continue to be required to publish their responses, and they can do this in whichever form they wish, so long as the published report contains relevant information submitted via the digital platform. It is not necessary for councils to publish all the information submitted via the digital platform.

- 5.3 Stafford Borough Council's responses to the 2021 return have been provided via the digital platform as required.
- 5.4 The answers have been amalgamated into a fully updated HECA report. This contains all the information that has been supplied via the digital platform and is presented in the format of a strategic council document for publication on the Stafford Borough Council website, included in **APPENDIX 1**.

6 Implications	
6.1 Financial	<p>Stafford Borough Council has committed an annual budget of £15,000 to run the Warmer Homes Stafford programme up until 31st March 2022. A budget bid is planned to seek continued revenue funding for Warmer Homes Stafford beyond this point.</p> <p>Up to £20,000 worth of Fuel Poverty Top Up grants available to help the fuel poor and most vulnerable households in the Borough via its Housing Assistance Policy. This is from existing Private Sector Housing budgets with no additional resource requirements.</p>
Legal	Nil
Human Resources	Nil
Human Rights Act	Nil
Data Protection	Nil
Risk Management	Nil
6.2 Community Impact Assessment Recommendations	<p>The Borough Council considers the effect of its actions on all sections of our community and has addressed all of the following Equality Strands in the production of this report, as appropriate:-</p> <p>Age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation.</p> <p>Updated CIA June 2021 provided at APPENDIX 2.</p>

Previous Consideration - Nil

Background Papers – N/A

HOME ENERGY CONSERVATION ACT 1995

2021 Update

Samantha Taylor
Lead Officer, Health and Housing Strategy

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1. Introduction

- 1.1. This report is prepared in accordance with guidance issued to local authorities under the Home Energy Conservation Act 1995. The 'Act' recognises local authorities' ability to use their position to improve the energy efficiency of all residential accommodation in their areas and requires authorities to provide reports on what is being done and to report to the Secretary of State on progress in implementing related measures.
- 1.2. The report sets out the Council's current performance in terms of our population and household demographics; data concerning the energy efficiency and thermal quality of our residents' homes; the relationship between these and resulting levels of fuel poverty; and our proposals to improve health, housing standards and energy efficiency in the Borough.
- 1.3. The Council and its partners have been proactive in tackling the issues of cold homes and the impact they have on fuel poverty, health (including excess winter deaths) and carbon emissions through a variety of mechanisms, including:
 - Delivery of advice, assistance and measures through Warmer Homes Stafford, a partnership between the local authority and a specialist energy agent.
 - Promotion of low cost and free energy efficiency measures under the Energy Company Obligation.
 - Collaboration with other district and borough councils within Staffordshire, along with Staffordshire County Council, E. ON, Beat the Cold, Communitas Energy CIC and Affordable Warmth Solutions with National Grid.
 - Partnership working with the voluntary, community, social enterprise and health sectors; and with private and social housing landlords.
 - Supporting the local 'green' supply chain.
 - Enforcement of the Housing Health and Safety Rating System in relation to cold homes.
- 1.4. This report sets out the actions the Council intends to take to continue improving the energy efficiency of residential accommodation in the area.

2. Our Ambitions and Priorities

- 2.1. The Council's [Corporate Business Plan 2021-2024](#) sets out our vision for “A prosperous and attractive Borough with strong communities” and is a three-year plan for “how we will continue to deliver and sustain economic growth, respect our environment, support our communities and ensure that the Borough is a great place in which to live, work and visit.”
- 2.2. To ensure the Council achieves its strategic objectives within the plan, key pieces of work in respect of Home Energy Conservation are informed and shaped accordingly:
- 2.2.1. “To improve the quality of life of local people by providing a safe, clean, attractive place to live and work and encouraging people to be engaged in developing strong communities that promote health and wellbeing”.

We will continue with a ‘Health in All’ approach with our partners, ensuring that the health of local people is paramount in everything we do – this is a firm part of our agenda when considering the negative health impacts of cold homes and in preparing our localised schemes for tackling fuel poverty and improving housing standards.

We encourage and support our residents to take responsibility for their own wellbeing and lifestyle – equipping people with the right information advice and guidance to manage their energy costs and consumption and to plan for the future maintenance of their homes is an important part of building resilience and sustainability into our communities.

To work towards everyone having access to safe and suitable accommodation we will provide support to enable residents to choose a good quality home, where we encourage and promote high standards, in particular in the private rented sector and use our enforcement powers to remedy poor conditions. A new Housing and Wellbeing Strategy is being developed and will include policies on affordable warmth, carbon reduction and fuel poverty.

- 2.2.2. “To tackle Climate Change by implementing our Climate Change and Green Recovery objectives.”

[The Climate Change and Green Recovery Strategy 2020-2040](#) outlines how we will work with our partners and community to achieve a more sustainable borough. We have committed to supporting the reduction of carbon emissions from domestic properties. Through advice, information, and access to funding we will enable residents to improve the energy efficiency of their homes with low carbon heating solutions, better insulation and behaviour changes.

Our green recovery plans will align economic recovery measures with the achievement of long-term climate change goals. We will focus on economic growth through the promotion of green jobs and technology, recognising the importance of the local energy efficiency retrofit supply chain to support the decarbonisation of buildings.

[The Local Plan for Stafford Borough](#) is currently being reviewed. A key objective is to promote sustainable construction and house building and encourage renewable energy production. The Plan will include policies supporting the building of sustainable and carbon neutral homes and designs for community heating.

3. Data and evidence of need

- 3.1. In 2015, the Building Research Establishment (BRE) were commissioned to undertake a stock survey for housing within Stafford Borough. This identified areas with high numbers of households in fuel poverty by comparing Energy Performance Certificate ratings with local indices of deprivation and other related data.
- 3.2. More recently, Stafford Borough Council has been working to identify non-gas households. The gas network maps have been combined with data from online sources and the BRE Stock Survey to identify wards and streets with higher levels of fuel poverty, low income and deprivation than other parts of the borough.
- 3.3. As part of the Warmer Homes Stafford programme, our specialist energy agent engages with a variety of organisations across the Borough to identify users of other services who may also be households living in fuel poverty. Areas where households receive WHS measures are investigated to detect neighbouring, eligible, fuel-poor properties.
- 3.4. In 2021, the method used to measure fuel poverty in England is changing to use the Low-Income, Low Energy Efficiency (LILEE) indicator, replacing the previously used Low Income High Costs (LIHC) indicator.

Under the LILEE indicator, a household is fuel poor if:

- The home has a fuel poverty energy efficiency rating of band D or below, and;
- when the resident spends the required amount to heat their home, they are left with a residual income below the official poverty line.

There are 3 important elements in determining whether a household is fuel poor:

1. Household income.
2. Household energy requirements.
3. Fuel prices.

Data is not yet available at local authority level under the new LILEE indicator. The most recently published data using the LIHC methods indicates that more than one in ten Stafford households are living in fuel poverty. This is higher than the national average¹.

- 3.5. The typical demographic approaching the WHS advice service is people over age 65 and those with long-term health conditions. We are seeing an increasing ageing population in Stafford Borough. By 2030, it is predicted that there will be 6,000 additional people aged 75 and over. Stafford has a higher proportion of lone pensioner households compared to the national average. Additionally, there is a higher proportion of residents in the Borough with a limiting long-term illness compared to the national average. As a result of these forecasts, the demands on the service are predicted to increase which suggests there may be more households living in fuel poverty.

¹ (Staffordshire County Council, 2018) *Stafford District Data Pack*. Retrieved from <https://www.staffordshireobservatory.org.uk/documents/District-Borough-Data-Packs/2018/Stafford-Data-Pack-2018.pdf>

- 3.6. A large number of homes in the borough are located in rural areas, where houses are typically older and are more likely to use traditional (solid fuel) methods to heat homes than in urban areas. As a result, there are more homes using oil and solid fuel in Stafford Borough (9%) than nationally and regionally (both 4%).
- 3.7. As a result of Covid-19, the cohort of households approaching the WHS advice service has changed in the last year. We are seeing an increasing number of young, employed, single parent families and couples with children contacting WHS for support. It is understood that this shift is being experienced on a national scale for energy advice services and is linked to reduced incomes due to the economic impact of the pandemic.

4. Delivery Mechanisms

4.1. Warmer Homes Stafford

Stafford Borough Council works in partnership with a specialist energy agent to deliver our [Warmer Homes Stafford](#) advice service. The scheme provides a platform for residents to access a range of energy saving advice (in line with guidance on the health risks associated with cold homes from the [National Institute for Health and Care Excellence](#)), heating and insulation grants, and measures which support carbon reduction.

Warmer Homes Stafford is a free to access, specialised energy advice service that provides advisory services to residents on how to save energy. This is provided over the telephone, in writing via email and letters, at public events, via health and voluntary sector partnerships or networking, and during home visits.

The Warmer Homes Stafford scheme offers residents a telephone and email advice service with a range of support and information. This includes advice on energy efficiency measures, support to access grants and funding, help with heating systems, how to effectively use heating controls, signing residents up to the Priority Services Register, checking eligibility for grants and government schemes such as the Warm Homes Discount and ensuring the resident is on the best energy deal from their supplier. The service also applies for grants on behalf of the householders, including hardship and energy efficiency funds.

To promote the service, Stafford Borough Council has a dedicated information page on its website with contact links and externally, there is a dedicated website - <https://warmerhomesstafford.org.uk/> - for the service, hosted by our specialist partner. Prior to Covid-19, the Council would work in Stafford Town Market Square, the Guildhall Shopping Centre and other community assets such as Rising Brook Baptist Church and Stone Community Hub to put on public displays, to promote the scheme to residents, and to host meetings and networking events; activity which we intend to resume when it is safe to do so and in line with government guidance.

Warmer Homes Stafford ordinarily operates at several outreach events in partnership with the Council or third sector organisations, such as Citizens Advice Bureau and Staffordshire Community Foundation, to bring advice and support to the community through a series of events and training/briefing sessions to frontline workers.

As a result of Covid-19, in-person events have not taken place throughout 2020/21 but the Warmer Homes Stafford team continue to work proactively to provide advice and support to the community. In November 2020, the Council set up a directory of signposting information, advice and guidance online in response to feedback from community groups, parish councils and statutory partners, in relation to community needs arising through impacts of Covid-19. A webinar on financial distress and hardship was organised for residents. A member of the

Warmer Homes Stafford team attended and provided information about the service to the audience.

Stafford Borough Council works with partners to create promotional material, which includes posters, flyers, leaflets, press releases, social media posts and website development. These materials are distributed at events, during home visits, through flyer handouts at public events, displayed in the Council offices and shared online.

Due to Covid-19, home visits were also not possible in 2020/21. However, the Warmer Homes Stafford team have adapted to new working methods and have been able to provide more regular and long-term support over the telephone to those individuals with complex situations.

The Council's [Housing Assistance Policy](#) makes capital funding available to provide Fuel Poverty Top-up grants. These assist households in fuel poverty to meet their contributions towards the costs of heating and insulation measures when there are shortfalls in external funding sources.

4.2. 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” programme allows councils 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.

Councils involved in the Flexible Eligibility 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 authority has been consulted on the installation of measures in a home. Stafford Borough Council published its most recent [Statement of Intent](#) in September 2020.

4.3. Staffordshire Warmer Homes

We also work collaboratively with other district and borough councils within Staffordshire, along with Staffordshire County Council, E. ON, Beat the Cold, Communitas Energy CIC and Affordable Warmth Solutions with National Grid. The consortium is known collectively as [Staffordshire Warmer Homes](#) and delivers several successful countywide schemes to improve energy efficiency, reduce carbon emissions and tackle fuel poverty. Through our WHS advice service, residents with identified needs are assisted with eligibility screening and referred seamlessly to Staffordshire Warmer Homes to receive a range of funded energy efficiency measures.

Staffordshire Warmer Homes projects have been funded as follows:

4.3.1. Warm Homes Fund - Category 1:

- £3.7 million provided by Affordable Warmth Solutions on behalf of Cadent and E.ON for measures across Staffordshire
- Approximately £462,500 is anticipated to be spent in Stafford Borough

4.3.2. Warm Homes Fund - Category 2:

- £562,000 provided by Affordable Warmth Solutions and matched by Energy Company Obligation monies and Communitas Energy CIC, providing a total amount of £1.41 million for measures across Staffordshire
- Approximately £176,000 expected to be spent in Stafford Borough

4.3.3. Green Homes Grants

Of the £2bn Green Homes Grant scheme introduced in summer 2020, £500m was assigned for Local Authority Delivery (LAD). LAD enables local authorities to bid for grant funding to support low-income households in their area with energy efficiency and low carbon heating upgrades. £200m was made available through local authority grant competitions in 2020, known as phases 1A and 1B and £300m was allocated under Phase 2 between the five regional Local Energy Hubs.

Staffordshire Warmer Homes was successful in its consortium application for Green Homes Grants LADS Phase 1. Since the end of 2020, the programme has been live, receiving applications and delivering measures throughout Staffordshire. Eligible households can receive a variety of measures from the following: External and Cavity Wall Insulation; Loft Insulation; Underfloor Insulation; Room in Roof Insulation; Air Source Heat Pumps; Solar Thermal; Windows and Doors; Heating Controls and Solar PV. Many households can receive multiple measures to retrofit their homes. The project ensures the average spend of measures per household is £10,000.

Recently, Stafford Borough Council received its allocation for Green Homes Grants LAD Phase 2 via the Midlands Energy Hub. Staffordshire Warmer Homes has received approval from the Midlands Energy Hub for the consortium to deliver a Phase 2 project collaboratively. Similarly to Phase 1, the same measures will be available for households at the same average spend level per household. Where funding for Phase 1 is taken from a combined Staffordshire-wide pot, in Phase 2 each district and borough council will retain its individually allocated funding level in the delivery of the project.

- Green Homes Grants - Local Authority Delivery Scheme (LADS) - Phase 1:
 - £920,000 provided by BEIS for measures across Staffordshire
 - Approximately £115,000 projected to be spent on measures in Stafford Borough
- Green Homes Grants - Local Authority Delivery Scheme (LADS) - Phase 2:
 - £605,000 provided by BEIS and released via Midlands Energy Hub for measures delivered in Stafford Borough.

Stafford Borough Council could not manage the delivery of a scheme such as GHG: LAD alone; it is only by virtue of the Staffordshire Warmer Homes consortium that we are able to offer this funding. A barrier we face in applying for funding alone is the limited time available to complete proper procurement in relation to securing funding and spending deadlines.

Through the Staffordshire Warmer Homes schemes, it is predicted that up to 58 measures funded by Green Homes Grants will be installed in homes across Stafford Borough per year, dependent on measure mix and the option of multiple measures being delivered in one household.

5. Delivery Performance

5.1. Warmer Homes Stafford

In 2020/21, the Warmer Homes Stafford scheme:

- Supported 566 individual households with advice, guidance, and referrals for measures.
- Referred 386 households for financial help with:
 - Covid-19 relief support through the Staffordshire Community Foundation. Up to £200 was available for households financially affected by Covid-19.
 - Fuel vouchers
 - Assistance with fuel bills by negotiating payment plans, debt resolution and changing tariffs.
- Made 109 onward referrals for part / wholly funded energy efficiency measures.
- Added 95 vulnerable households to the Priority Services Register.
- Employed 4 additional members of staff to meet the unusually high demand on the service because of Covid-19.
- Trained staff members to a minimum of NVQ Level 3 in Providing Energy Advice. The team has also created its own CPD training on fuel poverty.

5.2. The Energy Company Obligation

Since 2018/19 to May 2021, there have been 139 Flexible Eligibility (ECO) declarations issued to households. 73 have been issued for low-income, vulnerable households and 66 were issued for fuel poor households, to identify these residents as eligible for ECO funded measures under local terms.

5.3. Staffordshire Warmer Homes

Up to the end of 2020/21, the Staffordshire Warmer Homes schemes have:

- Installed 34 first time central heating systems into homes
- Replaced 28 boilers
- Referred 3 households to Communitas Energy CIC to receive Air Source Heat Pump installations
- Installed 1 measure through the Green Homes Grant LADS Phase 1 project
- Generated a pipeline of 12 further eligible, funded measures through the Green Homes Grant LADS Phase 1 project
- Reduced CO2 emissions through supporting the delivery of insulation measures

5.4. The following figures are forecasted targets for Stafford Borough by the end of each Staffordshire Warmer Homes scheme:

- Warm Homes Fund Category 1 – 100 First Time Central Heating Systems
- Warm Homes Fund Category 2 – 8 Air Source Heat Pumps
- Green Homes Grants - Local Authority Delivery Scheme (LADS) Phase 1 – 18 measures in 14 homes
- Green Homes Grants - Local Authority Delivery Scheme (LADS) Phase 2 – 14 External Wall Insulation, 14 Air Source Heat Pumps, 14 Solar PV, 12 Lower Cost Measures

6. Partnerships and Stakeholders

6.1. Voluntary, Community, Social Enterprise and Health partners

Warmer Homes Stafford is linked with local hospital discharge teams, elderly care facilitators from the NHS Midlands Partnership Foundation Trust Staying Well Service and NHS therapy centre, Greyfriars. The Warmer Homes Stafford service also communicates messages to the voluntary sector through the VCSE Locality Forum hosted by Support Staffordshire.

6.2. Local Economy

Stafford Borough Council is a member of the [Staffordshire Business and Environment Network \(SBEN\)](#). The Network help to enhance skills and knowledge through environmental training and counselling and provides businesses with practical advice on developing and implementing environmental policies as well as promoting examples of good environmental practice. The group have created a Low Carbon Business Enterprise Programme and part of this programme supports the decarbonisation of buildings. Stafford Borough Council attends events held by the SBEN and refers businesses to the Network for grant funding to support low carbon initiatives.

Stafford Borough Council is part of the Staffordshire Warmer Homes consortium, working with Beat the Cold, Staffordshire County Council, E. ON and Communitas Energy CIC to deliver the Warm Homes Fund Categories 1 and 2 and the Green Homes Grant Local Authority Delivery Schemes Phases 1 and 2.

6.3. Private Landlords

Stafford Borough Council has a partnership with the National Landlord Association to run regular landlord forums where changes in law are discussed. Where appropriate, the Council issues press releases, emails and letters and provides information on its website on changes to standards and any other issues relevant to private landlords and tenants.

6.4. Social Housing

6.4.1. Partnership working with Registered Housing Providers

The Warmer Homes Stafford scheme does not directly target social housing tenants. Instead, it prefers to work more closely with registered housing providers to support them in delivering measures and updating their properties in line with their set maintenance plans. Where funding schemes are open to social housing residents, it is found that the level of engagement is similar to that of residents in the private rented sector.

Communication with registered housing providers is currently being undertaken by our specialist energy advice agent on behalf of Stafford Borough Council, through the Staffordshire Warmer Homes schemes to explore opportunities to install energy efficiency or low carbon heat measures in social housing. The partnership is working to develop relationships with registered housing providers to install measures into eligible households and retrofit homes where the EPC rating is D or lower.

As part of the Warm Homes Fund Category 1 scheme, we successfully liaised with a registered housing provider who supported permissions for a community scheme, connecting several of their properties to the gas mains and installing first time central heating systems. This approach benefitted more fuel poor households than another part of the Warm Homes Fund project, which had delivered numerous one-off connections to individual properties.

6.4.2. Shared information and understanding

To access the information and knowledge that we would expect to need for social housing retrofit projects, on-going and proactive partnership working between Stafford Borough Council and registered housing providers with homes in the borough is essential. Whilst Energy Performance Certificate data is publicly available, there is a requirement to engage effectively with providers, and to have access to their stock condition survey to make meaningful and jointly relevant, strategic delivery plans.

With mutual commitment to key objectives relating to fuel poverty and carbon reduction we hope to develop greater understanding and insight into matters such as stock condition; property data; provider approaches to procurement; costings; alignment with existing internal maintenance/upgrade plans; tenant engagement and management plans. To date, there is limited alignment for social providers between energy efficiency retrofit, and maintenance plans.

6.4.3. Challenges

As part of the Warm Homes Fund Category 1 project, connecting homes to the gas mains and installing first time central heating systems, the Staffordshire Warmer Homes partnership is focussing on delivering measures via community schemes: connecting a whole street or estate to the gas mains. Where successful, this has resulted in more residents benefitting from the scheme and whole communities being alleviated from fuel poverty.

In practice, the delivery of a community scheme can be very difficult. For the scheme to be financially viable, approximately 90% of homes on the targeted street / estate need to sign up for connections. This can create barriers where a small number of residents choose not to engage and / or a large proportion of properties are rented; the need to seek approval from the landlord can elongate the process. Effective partnership working with registered providers is a welcome solution to this; challenges remain with properties rented from private landlords.

The Warm Homes Fund Category 2 project, funding 120 air source heat pumps across Staffordshire presents challenges in finding the most suitable property type to receive this measure and achieve the required outcomes. In practical terms, some properties simply do not have enough outside space to store the heat pump, for example, in blocks of flats or terraced houses.

The approach to retrofit change for leaseholders in mixed tenure blocks is different to the approach for residents who are renting their home. Liaising closely with registered housing providers throughout the process of works encourages cooperation. The challenge occurs in the time required for housing providers to complete a Section 20 (Landlord and Tenant Act 1985) consultation for the property they wish to improve. The minimum timescales for statutory consultation often do not fit within the tight timescales of funding periods. This can discourage registered housing providers from engaging in government funded projects.

7. Local Green Supply Chain

- 7.1. As part of the regeneration programme for Stafford Town Centre, we are working with local businesses and stakeholders, including the Chamber of Commerce, to understand how we can support the local supply chain in public sector projects.
- 7.2. All installers employed through E. ON's installer framework for the Staffordshire Warmer Homes projects are required to be PAS2035 compliant. This includes Trustmark registration.
- 7.3. Within the Climate Change and Green Recovery Strategy 2020-2040, we have committed to focus on economic growth through the promotion of green jobs and technology.

8. Enforcement of MEES

8.1. Resources

- 8.1.1. The Housing Standards Team is a sub-team of the wider Health and Housing Team at Stafford Borough Council. The Lead Officer for Housing Standards is

responsible for leading on enforcement of the Private Rented Sector Minimum Energy Efficiency Standards (MEES).

- 8.1.2. The Housing Options sub team sits alongside Housing Standards. This setup enables the Council to take a holistic approach to housing issues. The sub-teams collaborate to provide residents with advice on housing standards as an upstream homelessness prevention approach. In December 2019, the Options team recruited a Housing Solutions Officer who works to improve the council's relationship with private landlords. The objective of the role is to find more housing options for residents who are homeless or potentially homeless, as well as increasing communication with landlords and tenants to improve knowledge and awareness of housing standards legislation.

8.2. Challenges

- 8.2.1. A key barrier Stafford Borough Council faces is limited staffing resources. We would need to conduct a cost benefit analysis of the impact of enforcement before undertaking specific actions to proactively enforce MEES. We would also need to proactively identify non-compliant properties and landlords as we currently do not have access to this information. We will keep under review any opportunities to bid for relevant funding and support, or to work in partnership which may enable us to overcome these barriers.
- 8.2.2. Stafford Borough Council does not currently directly target properties which do not comply with MEES due to prioritisation of resources but addresses concerns where it becomes aware of such properties following the normal course of housing standards or housing advice cases. Advice and enforcement is provided if determined at an inspection conducted by the Housing Standards team. In these instances, the Council's [Enforcement](#) and [Housing Assistance Policies](#) also apply.

9. Smart Metering

- 9.1. As part of the delivery of Warmer Homes Stafford, smart meters are not actively promoted to residents accessing the service. However, where enquiries are received in relation to smart meters, impartial advice is given. WHS utilise materials from Smart Energy GB and provide these to residents who have enquired about wanting a smart meter.

10. Future Schemes and Wider Incentives

- 10.1. We will continue to access further schemes, and / or successors to current schemes.
- 10.2. Through the Staffordshire Warmer Homes consortium, we will actively seek additional funds to provide support to residents in saving energy and reduce carbon production, as and when these become available.

HECA Report 2021

Current Performance Data

ECO measures installed in households

Area Name	Carbon Saving Target (CERO)	Carbon Savings Community (CSCO)	Affordable Warmth (HHCRO)	ECO measures installed	Households with at least one usual resident	ECO measures per 1,000 households
Stafford	2,020	212	1,565	3,797	57,733	65.8
Staffordshire	15,819	3,236	15,076	34,131	366,751	93.1
West Midlands	100,464	63,852	196,038	360,354	2,366,567	152.3
England	874,183	402,049	1,194,572	2,470,804	22,884,180	108.0

(BEIS, 2021)

Households in receipt of ECO measures

Area Name	Households in receipt of ECO measures	Households with at least one usual resident	Households in receipt of ECO measures per 1,000 households
Stafford	2,927	57,733	50.7
Staffordshire	26,239	366,751	71.5
West Midlands	250,357	2,366,567	105.8
England	125,419	22,884,180	78.4

(BEIS, 2021)

Mean Domestic Gas Consumption

Area Name	Mean Domestic Gas Consumption (kWh)
Stafford	14,036
West Midlands	13,737
England	13,516

(BEIS, 2019)

Average Domestic Electricity Consumption

Area Name	Mean Domestic Electricity Consumption (kWh)
Stafford	3,677
West Midlands	3,615
England	3,611

(BEIS, 2019)

Fuel Poverty

In 2021, the method used to measure fuel poverty in England is changing to use the Low-Income Low Energy Efficiency (LILEE) indicator, rather than the old Low Income High Costs (LIHC) indicator.

Under the LILEE indicator, a household is considered to be fuel poor if:

- They are living in a property with a fuel poverty energy efficiency rating of band D or below and
- When they spend the required amount to heat their home, they are left with a residual income below the official poverty line.

There are 3 important elements in determining whether a household is fuel poor:

4. Household income
5. Household energy requirements
6. Fuel prices

(BEIS, 2021)

Data is not yet available at local authority level under the new LILEE indicator.

Most recent data published that uses the former LIHC indicator is as follows:

More than one in ten Stafford households are living in fuel poverty. This is higher than the national average. (Staffordshire County Council, 2018)

Households in Fuel Poverty

Area name	Number of households	Number of households in fuel poverty	Proportion of households fuel poor (%)
Stafford	59,511	8,493	14.3%
Staffordshire	379,914	57,618	15.2%
West Midlands	2,454,896	429,730	17.5%
England	23,661,751	3,175,979	13.4%

(BEIS, 2021)

24% of the Borough's LSOAs have higher levels of fuel poverty than the borough-wide, county, regional and national averages. (BEIS, 2021)

Borough Profile

Population

Stafford Borough is home to 137,280 people. The population has increased by nearly 4% since 2014. (ONS, 2019)

Demographics

The overall population of Stafford is projected to increase between 2017 and 2027 by 3% with a significant growth in people aged 65 and over (17%) and aged 85 and over (37%). The rate of increase in the number of older people in Stafford is faster than the England average and equates to 1,300 additional residents aged 85 and over by 2027.

5% of Stafford residents (7,100 people) live within the most deprived national quintile.

The dependency ratio for older people in Stafford is 36 older people for every 100 people of working age which is higher than England. (Staffordshire County Council, 2018)

Household Profile

Indicator	Period	Stafford	West Midlands	England
Lone parent households. % of households	2011	5.4	7.5	7.1
Household overcrowding. % of households	2011	2	4.6	4.8
% of children in low income families (under 16)	2016	10.9%	20.3%	17%
% of older people in poverty: income deprivation affecting older people	2019	8.3	10	14.2

(Public Health England, 2021)

Employment Rates

75.8% of 16–64-year-olds in Stafford Borough are in employment. This is higher than both regional and national levels (73.7% and 75.4% respectively).

Indicator	Stafford (No.)	Stafford (%)	West Midlands (%)	Great Britain (%)
Economically Active	66,900	78.9	78	79.1
In Employment	64,500	75.8	73.7	75.4
Employees	59,300	69.7	64.4	65.2
Self Employed	5,200	#	9.2	9.9
Unemployed	2,400	3.6	5.3	4.6

(Nomis, 2020)

Around 24% (31,900) of the population of Stafford are estimated to be financially stressed, i.e. find it difficult or very difficult to cope on their current income. (Staffordshire County Council, 2018)

The gap in the employment rate between those with a long-term health condition and the overall employment rate is higher in Stafford (12.7) than the gap regionally (9.9) and nationally (10.6). (Public Health England, 2021)

Health of Population

Life expectancy at birth in Stafford for both males (80.3 years) and females (84.2) is higher than the national averages (79.8 and 83.4 respectively), and similar for females to the national average at 83 years. (Public Health England, 2021)

Excess Winter Deaths

An estimated 28,300 excess winter deaths occurred in England and Wales in winter 2019 to 2020, which was 19.6% higher than winter 2018 to 2019.

Overall, the excess winter mortality index in 2019 to 2020 for England was higher for males than females for the first time since 1994-95.

Respiratory diseases continued to be the leading cause of excess winter deaths that occurred in 2019 to 2020.

When using deaths data including COVID-19 there were an estimated 8,700 EWD during the 2019 to 2020 winter. This is the lowest number recorded since the data time series began in 1950 to 1951. However, the low estimate is explained by the comparison with the large number of COVID-19 deaths that occurred mainly in the non-winter months April to July, rather than an exceptionally low number of winter deaths. (ONS, 2021)

The EWD Index (below) is calculated as excess winter deaths divided by the average non-winter deaths, expressed as a percentage. The percentage of EWD in Stafford Borough was significantly lower than rates in both the West Midlands and England.

Excess Winter Deaths Index (Aug 2018 - Jul 2019)	Stafford	West Midlands	England
	6.6%	13.9%	15.1%

(ONS, 2020)

Mental Health

Indicator	Period	Stafford	West Midlands	England
Emergency Hospital Admissions for Intentional Self Harm	2019-20	273.5	189.1	192.6
Suicide rate (persons)	2017-19	13.1	10.2	10.1
% of common mental disorders in population aged 16+	2017	14.1	17.7	16.9
% reporting depression or anxiety	2016-17	12.9	14.1	13.7

(Public Health England, 2021)

Age of Housing Stock

In 2012, more than 18% of dwellings in Stafford Borough were constructed prior to 1930, a time period where dwellings are likely to have solid walls or hard to heat cavities.

Property Build Periods	Stafford		Staffordshire (%)	West Midlands (%)	England (%)
	No.	%			
Pre 1900	6,320	11.19%	11.37%	11.93%	16.25%
1900 – 1918	1,820	3.22%	3.98%	4.71%	5.58%
1919 – 1929	2,130	3.77%	3.40%	5.83%	5.32%
1930 – 1939	4,320	7.65%	8.21%	12.53%	11.19%
1945 – 1954	5,090	9.02%	7.93%	8.21%	7.12%
1955 – 1964	8,130	14.40%	13.61%	12.76%	10.95%
1965 – 1972	7,220	12.79%	14.43%	12.27%	10.52%
1973 – 1982	6,590	11.67%	12.74%	10.03%	9.85%
1983 – 1992	4,150	7.35%	7.86%	6.96%	7.62%
1993 – 1999	3,360	5.95%	6.19%	5.37%	5.54%
2000 – 2009	5,220	9.25%	7.80%	7.08%	7.75%
2010 – 2012	500	0.89%	0.98%	1.06%	1.30%
Unknown	1,610	2.85%	1.49%	1.28%	1.01%

(Valuation Office Agency, 2012)

Housing Delivery

Within its Local Plan 2011-2031, Stafford Borough Council has committed to delivering 500 new homes annually (Stafford Borough Council, 2014). The Local Plan for Stafford Borough is currently being reviewed. The New Local Plan 2020-2040 will include a key objective to promote sustainable construction and house building and encourage renewable energy production. The Plan will include policies supporting the building of sustainable and carbon neutral homes and designs for community heating. (Stafford Borough Council, 2021)

Since 2011, 5,582 new homes have been delivered in the Borough, with an average of 620 homes delivered every year.

Year	2011-12	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20	Total	Average
No. of Homes Delivered	425	306	411	428	688	1,010	863	699	752	5582	620

(Stafford Borough Council, 2020)

Urban-Rural Distribution

There are approximately 43,300 people in Stafford living in rural areas, which equates to 32.2% of the population (Staffordshire County Council, 2018). This is significantly higher than the proportion of people living in rural areas across the West Midlands (15%) and England (17%). Research conducted by the National Housing Federation shows that rural areas have suffered from a lack of investment in new homes and the improvement of existing homes. Rural areas typically have older housing that use traditional, often more expensive, methods to heat homes than urban homes (National Housing Federation, 2018).

Housing Tenure

As shown in the table below, Stafford has a significantly higher percentage of owner-occupied homes than across England. Levels of social and private rented properties are subsequently lower in Stafford than England.

Indicator	Stafford		England	
	No.	%	No.	%
Social Housing	8,719	14%	4,174,286	17%
Owner-Occupied	46,877	76%	15,276,733	63%
Privately Rented	5,853	10%	4,807,635	20%
Total Households	61,444	100%	24,258,654	100%

(ONS, 2019) (ONS, 2021)

Central Heating

Stafford Borough has a similar proportion of homes on the gas mains as regional and national figures. The proportion of homes using electricity as a heating source is slightly lower in Stafford than regionally and nationally.

The number of homes in Stafford using oil and other heating types is more than double the proportion as the West Midlands and England.

Proportion of Households with Central Heating Types

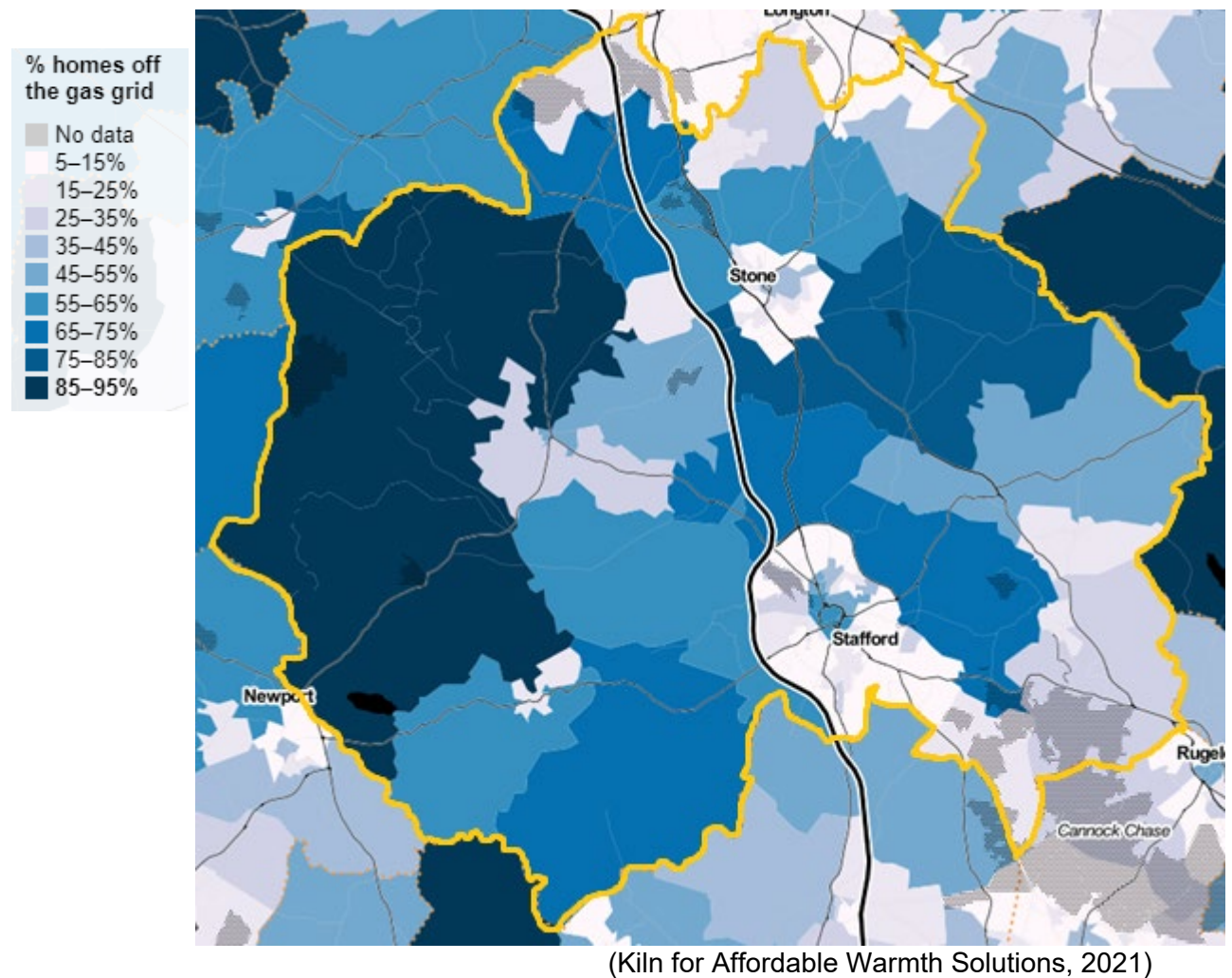
Method of Heating / Fuel Type	Stafford (%)	West Midlands (%)	England (%)
Community Heating Scheme	1%	2%	4%
Electricity	8%	11%	11%
Heat Pump	1%	1%	1%
Mains Gas	80%	81%	79%
Oil	6%	3%	3%
Other*	3%	1%	1%

**Includes dual fuel, solid fuel, tank or bottled gas, wood, B30K, bioethanol, biogas, biomass and liquid biofuel.*

(ONS, 2020)

Households off the Gas Grid

16,534 (27.3%) properties in Stafford Borough are estimated to have no access to gas. Of these, 66% are more than 23km away from a gas mains.



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Title Of Community Impact Assessment	HECA Report 2021
Date Conducted	21.06.2021
Lead Officer and Service Area	Sam Taylor, Development
CIA Team (To include a range of people with the appropriate knowledge and expertise in the subject area)	Sam Taylor Emily Rowley
Head of Service Sign off and Date	

Community Impact Assessment

Please ensure that you have read the following before completing the CIA

- A CIA will help you to identify the potential impacts, risks and benefits of your proposed policy, service or project. Doing this at an early stage enables engagement and research to be undertaken to identify actions that will either lessen the risk or maximise the benefits. The assessment will also help you to identify mitigating factors whereby risks may be balanced out to an extent by the benefits.
- This template should be used to support the development of a proposal during the planning stage, therefore should identify how it contributes to the Council's MTFS and Corporate Business Plan.
- A CIA Team should be identified with different, but relevant expertise to ensure that a full range of views are considered.
- Engagement and/or consultation should take place with appropriate and representative groups of people that are most likely to be affected. This must then be used to help shape the design/outcomes of the project. Please note that due to the publication of CIAs, it is advisable not to record personal details of members of the public, such as names or addresses.
- Once completed, the main findings from your CIA should be incorporated into your Cabinet report before submission and then included as an appendix. Please ensure that this is signed off by your Head of Service.

Community Impact Assessment

The table below describes what is required when completing the key sections of your assessment.

Which groups will be affected	Benefits	Risks	Mitigations / Recommendations
Which groups of people will be impacted by the proposed policy, service or project? This could be people in a particular area, a street, or a group of people with similar characteristics e.g. older people, young people or people with care needs. Also consider staff, residents and other external stakeholders.	Think about the impact the proposal may have on each of the different category areas, and identify the benefits of each decision.	Think about the impact the proposal may have on each of the different category areas, and identify the risks associated with the proposal.	Set out any recommendations as to how the benefits will be maximised and the risks minimised. Also highlight any trade-offs that may occur.
Please note: <ul style="list-style-type: none"> Potential impacts should not be included if it is considered highly unlikely that they would occur. Where no major impacts have been identified, please state N/A. Due to the publication of CIAs, it is advisable not to record personal details of members of the public, such as names or addresses. 			
Evidence Base: (Evidence used/ likelihood/ size of impact) How certain are you about the assessment of each potential impact, and what evidence have you used to arrive at the decision? E.g. Data – population trends data, census data, service data. Research – national, regional, local research. Engagement/ Consultation – with partners, the public, the voluntary sector.			

Use the following template to highlight the impacts of your proposal on each of the following categories: the Public Sector Equality Duty (PSED), Health and Care, the Economy, the Environment, and Localities/ Communities.

Community Impact Assessment

Public Sector Equality Duty (PSED) – Use this section to identify if the proposal will impact on our legal obligations under the Equality Act 2010 for both residents and staff. In summary, those subject to the general equality duty must have due regard to the need to: Eliminate unlawful discrimination, harassment and victimisation, advance equality of opportunity between different groups and foster good relations between different groups. Consider the following questions:			
1. Who is currently using the service, across the protected characteristics? 2. What relevant information is available from the Census and population trends data? 3. What were the findings of the engagement/consultation? 4. What do we know about their experiences and outcomes?		5. Is there any relevant national, regional and/or local sources of research/evidence available? 6. Is there any relevant information from partners or voluntary, community, social enterprise organisations? 7. What is the analysis of the impact on those with relevant protected characteristics?	
General Comments regarding protected characteristics		The typical demographic approaching the Warmer Homes Stafford advice service is people over age 65 and those with long-term health conditions. Partner insight tells us that as a result of Covid-19, the cohort of households approaching the WHS advice service has changed in the last year. We are seeing an increasing number of young, employed, single parent families and couples with children contacting WHS for support.	
Protected Characteristics:	Who may be affected? ✓	Please indicate what the potential impact and or risks will be?	Mitigations / Recommendations
<ul style="list-style-type: none"> Race 	People whose first language is not English	Risk: exclusion; Access to the service is often via online or telephone-based channels of communication, where language may be a barrier.	We will work with customers and their families, support networks and partner agencies where applicable to translate conversations and provide key documents such as policies and funding agreements in other languages.
<ul style="list-style-type: none"> Disability 	The typical demographic approaching the Warmer Homes	Risk: exclusion; Access to the Warmer Homes Stafford service is often via online or telephone-based channels of communication. People with a sight impairment, learning disability, hearing or speech impairment, poor literacy skills or physical disability	Mitigation: In line with NICE guideline [NG6] ² , the service will: 1. In collaboration with relevant local authority departments, use existing data, professional contacts

² Excess winter deaths and illness and the health risks associated with cold homes; Published: 05 March 2015

Community Impact Assessment

	<p>Stafford advice service is people with long-term health conditions.</p>	<p>preventing the use of IT and phones, may not be able to make an enquiry into the service.</p> <p>Risk: Access to home energy provider services may present similar challenges to those above.</p> <p>Impact: Cold homes can affect or exacerbate a range of health problems including respiratory problems, circulatory problems, and increased risk of poor mental health.¹</p> <p>Impact: More vulnerable residents are receiving support and improved heating systems, which could lead to a reduction in the number of households living in fuel poverty and excess winter deaths.</p> <p>Risk: Temporary disruption may be caused in homes where measures are being installed and the occupier is sensitive to change, noise, temperatures, etc.</p>	<p>and knowledge to identify people who live in cold or hard-to-heat homes. This includes people who are particularly vulnerable to the cold.</p> <p>2. Include this information in the person's records and use it (with their consent) to assess their risk and take action, if necessary.</p> <p>3. Ensure data sharing issues are addressed so that people at risk can be identified.</p> <p>The service will include options for home visiting, correspondence by letter where preferred, including using large print.</p> <p>Mitigation: Warmer Homes Stafford will work on the client's behalf (with their consent) to deal with tariff switching, energy bill queries, energy related debts and funding applications.</p> <p>Recommendation: Wherever possible, services and funding will be targeted to give priority and increased eligibility to those who are vulnerable to the effects of living in a cold home due to disability or health condition.</p> <p>Recommendation: Residents who are eligible (due to being disabled or chronically sick; having a long term medical condition; hearing or vision impairment or additional communication needs) will be advised and supported to join the Priority Services Register.</p>
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¹ Hills J. Getting the measure of fuel poverty: Final Report of the Fuel Poverty Review. London: 2012

Community Impact Assessment

			Mitigation: Our specialist energy advice agent will provide a single point of contact for the resident for queries. Clear information will be provided in advance in relation to proposed works e.g. amount of disruption it will cause, length of time it will take for measures to be installed, appropriate advice and guidance on how to use new heating systems/technologies.
• Sex	N/A	N/A	
• Age	<p>Typically, people over age 65 are approaching the Warmer Homes Stafford advice service.</p> <p>As a result of Covid-19, there is an increasing number of young families with children approaching the service.</p>	<p>Risk: Groups who are already vulnerable such as young children, older people and those with pre-existing health problems will be particularly susceptible to cold. Cold homes and poor housing condition have been linked with a range of health problems in children and young people, including respiratory health, mental health, growth and long-term health.³</p> <p>Risk: Cold homes can [] affect wider determinants of health, such as educational performance among children and young people, as well as work absences.⁴</p> <p>Risk: Temporary disruption may be caused in homes where measures are being installed and the occupier is sensitive to change, noise, temperatures, etc.</p> <p>Impact: More vulnerable residents are receiving support and improved heating systems, which could</p>	<p>Mitigation: Wherever possible, services and funding will be targeted to give priority and increased eligibility to those who are vulnerable to the effects of living in a cold home due to their age.</p> <p>Recommendation: Residents who are eligible (due to being of pensionable age or living with children under the age of 5) will be advised and supported to join the Priority Services Register.</p> <p>Mitigation: Our specialist energy advice agent will provide a single point of contact for the resident for queries. Clear information will be provided in advance in relation to proposed works e.g. amount of disruption it will cause, length of time it will take for measures to be installed, appropriate advice and</p>

³ Harker L, Shelter. Chance of a lifetime : the impact of bad housing on children's lives: London : Shelter; 2006

⁴ [Local action on health inequalities: Fuel poverty and cold homerelated health problems](#); Reuben Balfour and Jessica Allen, Public Health England 2014

Community Impact Assessment

		lead to a reduction in the number of households living in fuel poverty and excess winter deaths.	guidance on how to use new heating systems/technologies.
<ul style="list-style-type: none"> Religion or Belief 	In some religious denominations, the manifestation of belief and laws of religion can impact on dealings with money and finances.	Risk: In some Islamic denominations, observers are not permitted to benefit from lending money or receiving money from someone. This may impact on a resident's ability to accept help with their home energy efficiency through grant funding for measures, debt relief like fuel vouchers or repayment plans.	Mitigation: Residents will be supported to consider a range of solutions and opportunities available to them, to improve the energy efficiency and thermal comfort of their home, including support to self-fund works and to access appropriate finance products.
<ul style="list-style-type: none"> Gender Reassignment 	Where an individual is actively involved in transitioning and their health is impacted by the effects of living in a cold home.	<p>Risk: A person who is receiving medical intervention to support gender reassignment may be temporarily vulnerable to the effects of living in a cold home, due to the use/side effects of medication or during recovery from hospital treatment.</p> <p>Risk: a person who is transitioning may experience discrimination or unconscious bias in the application of eligibility criteria for funded measures which is based on combined household income if advisors or application forms do not recognise diverse households.</p>	<p>Mitigation: Residents who are eligible (due to being in a vulnerable situation) will be advised and supported to join the Priority Services Register. A vulnerable situation may include:</p> <ul style="list-style-type: none"> people with certain mental health conditions which impact their understanding of an energy bill. people who cannot top up their pre-payment meter due to injury. temporary circumstances, where the resident might need extra support for a limited amount of time. <p>Recommendation: residents using the Warmer Homes Stafford service will be asked which pronouns they prefer to use and this information will be included in the person's records.</p> <p>Mitigation: information on gender may be collected on application forms for funded measures. This is to</p>

Community Impact Assessment

			<p>support equalities monitoring and improvement, but additionally will be used to determine household composition.</p> <p>In Stafford Borough Council's Flexible Eligibility Statement of Intent for Energy Company Obligation (ECO) funding, there are clear criteria for determining households on a low income who may be experiencing fuel poverty. In the criteria, household income thresholds are set out in relation to the number of adults and children occupying an address and avoids the use of language which infers bias towards any particular gender.</p>
<ul style="list-style-type: none"> Sexual Orientation 	<p>Services may not have good understanding of the problems or challenges that members of the LGBTQ+ community are facing.</p>	<p>Risk: a person from the LGBTQ+ community may experience discrimination or unconscious bias in the application of eligibility criteria for funded measures which is based on combined household income if advisors or application forms do not recognise diverse households.</p>	<p>Mitigation: information on sexual orientation may be collected on application forms for funded measures. This is to support equalities monitoring and improvement, but additionally will be used to determine household composition.</p> <p>In Stafford Borough Council's Flexible Eligibility Statement of Intent for Energy Company Obligation (ECO) funding, there are clear criteria for determining households on a low income who may be experiencing fuel poverty. In the criteria, household income thresholds are set out in relation to the number of adults and children occupying an address, as opposed to outdated household models referring to couples and families. The policy avoids the use of language which infers bias towards any particular sexual orientation, i.e. "Mr & Mrs".</p>
<ul style="list-style-type: none"> Pregnancy and Maternity 	<p>As a result of Covid-19, there is an increasing</p>	<p>Risk: Groups who are already vulnerable such as young children, older people and those with pre-existing health problems will be particularly susceptible to cold. Cold homes and poor housing</p>	<p>Mitigation: Wherever possible, services and funding will be targeted to give priority and increased eligibility to those who are vulnerable to the effects of living in a cold home due to their age. A vulnerable</p>

Community Impact Assessment

	<p>number of young, single parent families and couples with children contacting WHS for support.</p>	<p>condition have been linked with a range of health problems in children and young people, including respiratory health, mental health, growth and long-term health.⁵</p> <p>Impact: The changing demographic could result in more children and families benefitting from home energy efficiency measures and support. This could reduce the number of families living in fuel poverty in the borough.</p> <p>Risk: Temporary disruption may be caused in homes where measures are being installed and the occupier is sensitive to change, noise, temperatures, etc.</p>	<p>situation may include temporary circumstances, where the resident might need extra support for a limited amount of time, such as during pregnancy.</p> <p>Recommendation: Residents who are eligible (due to being of pensionable age or living with children under the age of 5) will be advised and supported to join the Priority Services Register.</p> <p>Mitigation: Our specialist energy advice agent will provide a single point of contact for the resident for queries. Clear information will be provided in advance in relation to proposed works e.g. amount of disruption it will cause, length of time it will take for measures to be installed, appropriate advice and guidance on how to use new heating systems/technologies.</p>
<ul style="list-style-type: none"> Marriage and Civil Partnership 	<p>As a result of Covid-19, there are an increasing number of couples approaching the WHS for support.</p>	<p>Risk: people who are co-habiting may experience discrimination or unconscious bias in the application of eligibility criteria for funded measures which is based on combined household income if advisors or application forms do not recognise diverse households.</p>	<p>Mitigation: information on marital status may be collected on application forms for funded measures. This is to support equalities monitoring and improvement, but additionally will be used to determine household composition.</p> <p>In Stafford Borough Council's Flexible Eligibility Statement of Intent for Energy Company Obligation (ECO) funding, there are clear criteria for determining households on a low income who may be experiencing fuel poverty. In the criteria, household</p>

⁵ Harker L, Shelter. Chance of a lifetime : the impact of bad housing on children's lives: London : Shelter; 2006

Community Impact Assessment

			income thresholds are set out in relation to the number of adults and children occupying an address and avoids the use of language which infers bias towards any particular relationship status i.e., Mr & Mrs”.
Evidence Base: (Evidence used/ likelihood/ size of impact): The assessment of each potential protected characteristic impact is based on evidence obtained from: government data; census data; service data; national, regional and local research and feedback from service partners and residents.			

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Health and Care – Use this section to determine how the proposal will impact on resident's health and wellbeing, and whether the proposal will impact on the demands for, or access to health and care services.

Category Area	Who will be affected? ✓	Please indicate what the potential impact and or risks will be?	Mitigations / Recommendations
Mental Health and Wellbeing Will the proposal impact on the mental health/wellbeing of residents or services that support those with Mental Health issues?	Residents receiving support from the Warmer Homes Stafford service and associated projects.	<p>Impact: Cold homes can affect or exacerbate a range of health problems including respiratory problems, circulatory problems and increased risk of poor mental health⁶.</p> <p>The Home Energy Conservation Act Report Update 2021 sets out the ways in which Stafford Borough Council will work to improve the energy efficiency of homes and reduce fuel poverty within the Borough.</p> <p>The impact on people with mental health concerns may include improved mental health and wellbeing due to improved thermal comfort at home, reduced energy bills, fuel debt relief and associated support received.</p> <p>Risk: People with mental health concerns such as anxiety may find it difficult to advocate for themselves in matters relating to home fuel bills, minimum energy efficiency standards required of private landlords and applications for (funding) support. They may be less able to cope with pressure sales tactics when sourcing affordable energy deals or lack the confidence to pursue a query or complaint.⁷</p>	<p>Mitigation: In line with NICE guideline [NG6]⁸, the Warmer Homes Stafford service will:</p> <ol style="list-style-type: none"> 1. In collaboration with relevant local authority departments, use existing data, professional contacts and knowledge to identify people who live in cold or hard-to-heat homes. This includes people who are particularly vulnerable to the cold. 2. Include this information in the person's records and use it (with their consent) to assess their risk and take action, if necessary. 3. Ensure data sharing issues are addressed so that people at risk can be identified. <p>The service will include options for home visiting and a range of communication methods to best support the needs and preferences of the individual.</p> <p>Mitigation: Warmer Homes Stafford will work on the client's behalf (with their consent) to deal with tariff switching, energy bill queries, energy related debts and funding applications to avoid stressful situations or overloading information and advice.</p>

⁶ [Local action on health inequalities: Fuel poverty and cold homerelated health problems](#); Reuben Balfour and Jessica Allen, Public Health England 2014

⁷ Vulnerability in the Domestic Energy Market: National Energy Agency Webinar 28th July 2020

⁸ Excess winter deaths and illness and the health risks associated with cold homes; Published: 05 March 2015

Community Impact Assessment

Category Area	Who will be affected? ✓	Please indicate what the potential impact and or risks will be?	Mitigations / Recommendations
		<p>Risk: Disruption whilst energy efficiency measures are being installed may lead to temporary discomfort or distress.</p>	<p>Recommendation: Wherever possible, services and funding will be targeted to give priority and increased eligibility to those who are vulnerable to the effects of living in a cold home due to disability or health condition.</p> <p>Recommendation: Residents who are eligible (due to being disabled or chronically sick; having a long term medical condition; hearing or vision impairment or additional communication needs) will be advised and supported to join the Priority Services Register.</p> <p>Mitigation: Our specialist energy advice agent will provide a single point of contact for the resident for queries. Clear information will be provided in advance in relation to proposed works e.g. amount of disruption it will cause, length of time it will take for measures to be installed, appropriate advice and guidance on how to use new heating systems/technologies. Signposting may be offered to partner agencies and relevant voluntary sector groups offering related services e.g. peer support, befriending.</p>
Healthy Lifestyles Will the proposal promote independence and personal responsibility, helping people to make positive choices around	Residents receiving support from the Warmer Homes Stafford	Poverty is associated with poor long-term physical and mental health and low life expectancy. Living in poor quality housing, being exposed to poor quality environmental conditions, poor quality work and unemployment, not being able to afford nutritious food and sufficient heating for example all impact on	Signposting may be offered to partner agencies and relevant voluntary sector groups offering related services e.g. food banks, physical activities, smoking cessation support, fire and rescue.

Community Impact Assessment

Category Area	Who will be affected? ✓	Please indicate what the potential impact and or risks will be?	Mitigations / Recommendations
physical activity, healthy food and nutrition, smoking, problematic alcohol and substance use, and sexual health?	service and associated projects.	<p>health. Poverty is also stressful. Coping with day-to-day shortages, facing inconveniences and adversity and perceptions of loss of status all affect physical and mental health in negative ways.⁹</p> <p>The Home Energy Conservation Act Report outlines improvements to energy efficiency of homes and the specialist energy advice service offered to residents. Through the Warmer Homes Stafford and associated projects, measures to retrofit homes will reduce the number of households living in fuel poverty and increase the number of people living in a warm home environment.</p> <p>Additional outcomes include improved wellbeing, improved financial capacity, greater control over circumstances. In turn, these benefits may also contribute to improvements in healthy lifestyle choices.</p>	
Accidents and Falls Prevention Does the proposal reduce or increase the risk of: falls in older people, childhood accidents, road accidents, or workplace accidents?	Residents receiving support from the Warmer Homes Stafford service and associated	Older people may also be particularly vulnerable to the impacts of cold homes. Among older people, cold temperatures increase risks of strokes and circulatory problems, respiratory problems, hospital admission, and lower strength and dexterity leading to an increase in the likelihood of falls and accidental injuries. ¹⁰	

⁹ [The Marmot Review 10 Years On](#)

¹⁰ Woodhouse PR, Khaw KT, Plummer M. Seasonal variation of blood pressure and its relationship to ambient temperature in an elderly population. Journal of hypertension. 1993;11(11):1267-74.

Rudge J, Gilchrist R. Excess winter morbidity among older people at risk of cold homes: a population-based study in a London borough. Public Health (Oxf). 2005;27(4):353-8

Community Impact Assessment

Category Area	Who will be affected? ✓	Please indicate what the potential impact and or risks will be?	Mitigations / Recommendations
	projects; primarily older people and those with health concerns.	<p>In 2019/20 there were 655 emergency hospital admissions due to falls in people aged 65 and over in Stafford Borough.¹¹</p> <p>Improvements to home energy efficiency by the installation of measures or improving a resident's financial capacity to heat their home through reduced debts, better value tariffs and behaviour change can increase warmth and thermal comfort, which in turn can help to prevent falls at home.</p>	
Access to Social Care Will the proposal enable people to access appropriate interventions at the right time?	N/A	<p>N/A it is unlikely that the services described in the Home Energy Conservation Act will lead to people accessing interventions; on the contrary, social care functions will often be the agencies making referrals into home energy advice services having identified a need. Warmer Homes Stafford service providers are equipped to make referrals to social care services including Staffordshire Cares, social prescribing and Staying Well.</p>	<p>The energy advice service delivering the Warmer Homes Stafford scheme is linked with local hospital discharge teams, elderly care facilitators from the NHS Midlands Partnership Foundation Trust Staying Well Service and NHS therapy centre, Greyfriars. Primarily this is collaborative working with relevant professionals who can help to identify people living in cold or hard-to-heat homes.</p>
Independent Living Will the proposal impact on people's ability to live independently in their own home, with care and support from family, friends, and the community?	Residents receiving support from the Warmer Homes Stafford service and associated projects;	<p>The Home Energy Conservation Act Report outlines improvements to energy efficiency of homes and the specialist energy advice service offered to residents. Through the Warmer Homes Stafford and associated projects, measures to retrofit homes, action taken to enforce minimum energy efficiency standards will reduce the number of households living in fuel poverty and increase the number of people living in a warm home environment.</p>	<p>Recommendation: Residents who are eligible will be advised and supported to join the Priority Services Register. This ensures the provision of additional support from energy suppliers and network operators which further enables ongoing independent living for the resident.</p>

¹¹ [Public Health Profiles](#)

Community Impact Assessment

Category Area	Who will be affected? ✓	Please indicate what the potential impact and or risks will be?	Mitigations / Recommendations
	primarily older people and those with health concerns.	Additional outcomes include improved wellbeing, improved financial capacity, greater control over circumstances, reduced likelihood of falls, reduced admissions to hospital, faster discharge from hospital. In turn, these benefits may also contribute to sustained independent living.	
Safeguarding Will the proposal ensure effective safeguarding for the most vulnerable in our communities?	Residents receiving support from the Warmer Homes Stafford advice service and associated projects.	Specialist energy advice partners and other delivery agents and stakeholders are obligated to ensure a duty of care for all children and adults across our services and are committed to ensuring that those using the services organised and provided by us are protected and kept safe from harm. Partners recognise that in addressing fuel poverty in particular, services are often targeted at vulnerable households. Risk assessments are carried out where appropriate and safeguarding processes are in place.	
Evidence Base: (Evidence used/ likelihood/ size of impact) The assessment of each potential health impact is based on evidence obtained from service data; local research and feedback from service partners and residents.			

Community Impact Assessment

Economy – Use this section to determine how the proposal will impact on the economy of Stafford Borough and the income of residents.

Category Area	Who will be affected? ✓	Please indicate what the potential impact and or risks will be?	Mitigations / Recommendations								
Economic Growth Will the proposal promote the Borough and make it easy for businesses to start up, innovate and expand?	Local Green Energy Supply Chain	In participating in collaborative schemes such as Staffordshire Warmer Homes and by publishing our Home Energy Conservation Act Report, along with the ECO Flexible Eligibility Statement of Intent, Stafford Borough Council are making clear our intentions to improve home energy efficiency in the Borough via the installation of heating and insulation measures. This enables us to lever in external funding and to make central government funding from the Department for Business, Energy and Industrial Strategy available locally. Local businesses in retrofit, home heating, insulation and climate change industries can start up, innovate and expand to meet the needs of households and property owners looking for suppliers and trades to complete funded work to their homes.									
Poverty and Income Will the proposal have an impact on income? Will it reduce the gap between high and low earners?	Residents being supported through the Warmer Homes Stafford service.	<p>24% of the Borough's Lower Super Output Areas have higher levels of fuel poverty than the borough-wide, county, regional and national averages. (BEIS, 2021)</p> <table border="1"> <thead> <tr> <th>Area name</th><th>Number of households</th><th>Number of households in fuel poverty</th><th>Proportion of households fuel poor (%)</th></tr> </thead> <tbody> <tr> <td>Stafford</td><td>59,511</td><td>8,493</td><td>14.3%</td></tr> </tbody> </table> <p>Support available from the Warmer Homes Stafford service includes switching suppliers and changing tariffs and retrofitting properties with more energy efficient heating systems. This support will help to reduce fuel bills. In addition, the service will assist residents to check their entitlement to</p>	Area name	Number of households	Number of households in fuel poverty	Proportion of households fuel poor (%)	Stafford	59,511	8,493	14.3%	<p>The Energy Company Obligation (ECO) is an obligation on energy suppliers aimed at helping households cut their energy bills 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" programme allows councils to make declarations determining that certain households in fuel poverty or with occupants on low incomes are referred to ECO obligated suppliers for support under the Affordable Warmth element of ECO.</p>
Area name	Number of households	Number of households in fuel poverty	Proportion of households fuel poor (%)								
Stafford	59,511	8,493	14.3%								

Community Impact Assessment

Category Area	Who will be affected? ✓	Please indicate what the potential impact and or risks will be?	Mitigations / Recommendations
		benefits, make applications and signposting to other agencies such as debt and money advice services.	Councils involved in the Flexible Eligibility 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 authority has been consulted on the installation of measures in a home. Stafford Borough Council published its most recent Statement of Intent in September 2020 .
Workplace Health and Environments Will the proposal impact on working conditions and the health of the Borough's workforce?	The projects described in the report will not impact on working conditions and the health of the borough's workforce.	N/A	
Access to jobs/ Good quality jobs Will the proposal create the right conditions for increased employment in more and better jobs?	Local Green Energy Supply Chain	Local businesses in retrofit, home heating, insulation and climate change industries can provide additional employment and training opportunities as they expand to meet the needs of households and property owners looking for suppliers and trades to complete funded work to their homes.	
Evidence Base: (Evidence used/ likelihood/ size of impact) The assessment of the economic impacts is based on feedback from service partners and residents.			

Community Impact Assessment

Environment – Use this section to identify the impact of the proposal on the physical environment. How does the proposal support the utilisation and maintenance of Staffordshire’s built and natural environments, thereby improving health and wellbeing and strengthening community assets?			
Category Area	Who will be affected? ✓	Please indicate what the potential impact and or risks will be?	Mitigations / Recommendations
Built Environment/ Land Use Will the proposal impact on the built environment and land use?	Residents receiving retrofit measures, including through grant funding, and their neighbours.	<p>There is a minimal impact on the built environment in respect of retrofitted measures to existing domestic dwelling spaces.</p> <p>Space is required for measures e.g. gas meter box, air source heat pumps.</p> <p>Measures changing the appearance of properties e.g. rendered look as a result of external wall insulation, gas meter box being installed on front of homes being connected to gas mains etc.</p> <p>Impact: Expansion of the gas mains network. This will enable more buildings, both domestic and non-domestic to be connected to gas.</p>	<p>Full property surveys to be conducted prior to measures installed to identify whether new measure(s) can feasibly fit on the property’s land.</p> <p>Planning permission sought where applicable.</p>
Rural Environment Will the proposal impact on the rural natural environment or on access to open spaces?	N/A	N/A	
Air, Water and Land Quality Will the proposal affect air quality (e.g. vehicle, industrial or domestic emissions), drinking water quality or land quality?	Residents applying retrofit measures to their homes, including through grant funding.	Where retrofitted energy efficiency measures are installed domestic emissions can be reduced in some cases. This supports Stafford Borough Council’s Climate Change and Green Recovery Strategy 2020-2040.	

Community Impact Assessment

Waste and Recycling Will the proposal affect waste (e.g. disposal) and recycling?	Residents applying retrofit measures, including through grant funding	Many of the measures available produce less waste than the older heating systems being replaced e.g. where oil is replaced with a gas central heating system, or air source heat pump, there is no longer a need for tankers of oil to be delivered to the property. This reduces waste.	
Agriculture and Food Production Will the proposal affect the production of healthy, affordable, culturally acceptable food?	The projects described in the report will not affect agriculture and the production of food.	N/A	
Transport Will the proposal affect the ability of people/ communities/ business to travel? Will the proposal impact on walking/ cycling opportunities?	The projects described in the report will not affect the ability to travel.	N/A	
Noise Will the proposal cause disruptive noise?	Residents applying retrofit measures, including through grant funding, and their neighbours.	<p>Disruption may be caused whilst measures are being installed into property.</p> <p>Air source heat pumps can be noisy.</p> <p>The installation of additional glazing layers or uPVC doors and windows can reduce the impact of noise.</p>	<p>Forewarning of the works provided to residents and their neighbours with anticipated dates of work and other relevant information.</p> <p>Contractors to provide as much information about the new measures as possible to residents before measures are installed.</p> <p>Heat pumps make a noise, but it's not loud. There are strict guidelines within the design standard of</p>

Community Impact Assessment

			where you can put a heat pump and how far it can be from a neighbour's bedroom or living room window.
Evidence Base: (Evidence used/ likelihood/ size of impact) The assessment of each potential impact is based on evidence obtained from: government data; service data; national, regional and local research and feedback from service partners and residents.			

Community Impact Assessment

Localities / Communities – Use this section to identify the impact of the proposal on communities. How will the proposal strengthen community capacity to create safer and stronger communities? It is important to recognise the different communities your proposal may impact upon, and identify any communities that could be more adversely impacted than others.

Category Area	Who will be affected? ✓	Please indicate what the potential impact and or risks will be?	Mitigations / Recommendations
Community Development/ Capacity Will the proposal affect opportunities to work with communities and strengthen or reduce community capacity?	Residents being supported by Warmer Homes Stafford service.	<p>The projects described in the report will expand our opportunities to work with communities. In response to residents contacting the Warmer Homes Stafford service for support, we will be able to better identify areas around the borough that require warm homes improvements and fuel poverty assistance.</p> <p>Some grant funding opportunities require a critical mass of several properties within a small area receiving measures simultaneously, e.g. gas network extension schemes. In order to generate sufficient eligible applications, “Community Schemes” are developed and it can strengthen communities when residents actively share information and recommend improvements to their neighbours.</p> <p>In order to increase the positive wellbeing outcomes that are possible from interventions with vulnerable and low-income households, specialist energy advisors will signpost residents to relevant voluntary sector and community groups offering related services e.g. peer support, befriending.</p>	
Crime/ Community Safety Will the proposal support a joint approach to responding to crime and addressing the causes of crime?	The projects described in the report will not support our approach to	N/A	

Community Impact Assessment

	addressing crime.		
Educational Attainment and Training Will the proposal support school improvement and help to provide access to a good education? Will the proposal support the improved supply of skills to employers and the employability of residents?	Children of residents receiving support from the Warmer Homes Stafford service.	Risk: Cold homes can [] affect wider determinants of health, such as educational performance among children and young people, as well as work absences. ¹² Where heating improvements are made to properties it will reduce the number of children living in fuel poverty. This could, indirectly, increase school attendance, or educational attainment as children are less likely to be away from school due to illness exacerbated by living in a cold home.	
Leisure and Culture Will the proposal encourage people to participate in social and leisure activities that they enjoy?	The projects described in the report will not influence people's participation in social and leisure activities.	N/A	
Volunteering Will the proposal impact on opportunities for volunteering?	Beat the Cold; fuel poverty charity volunteers	Warmer Homes Stafford is a partnership between Stafford Borough Council and independent fuel poverty charity, Beat the Cold. Beat the Cold offer opportunities for volunteering to support their projects and services when appropriate.	
Best Start Will the proposal impact on parental support (pre or	The projects described in the report	N/A	

¹² [Local action on health inequalities: Fuel poverty and cold home related health problems](#); Reuben Balfour and Jessica Allen, Public Health England 2014

Community Impact Assessment

postnatally), which helps to ensure that children are school-ready and have high aspirations, utilising a positive parenting approach?	will not impact on parental support.		
Rural Communities Will the proposal specifically impact on rural communities?	Residents receiving support from Warmer Homes Stafford service.	One of the funding streams currently available, the Warm Homes Fund Category 2 project, is specifically aimed at rural properties that use more traditional heating methods. Residents who approach the Warmer Homes Stafford service can benefit from upgrades to their heating systems in the form of air source heat pumps. Many of the other funding streams and services provided by Warmer Homes Stafford can also support residents living in rural communities.	
Evidence Base: (Evidence used/ likelihood/ size of impact) The assessment of each potential impact is based on evidence obtained from: service data; local research and feedback from service partners and residents.			

Community Impact Assessment

Checklist	Action Completed ✓	Comments/Actions
Does the project support the Corporate Business Plan, business objectives and MTFS.	✓	<p>The HECA Report includes detail within Section 2 ‘Our Ambitions and Priorities’ that outline how the projects support the Corporate Business Plan objectives:</p> <ul style="list-style-type: none"> 1.1. To improve the quality of life of local people by providing a safe, clean, attractive place to live and work and encouraging people to be engaged in developing resilient communities that promote health and wellbeing. 1.2. To tackle Climate Change by implementing our Climate Change and Green Recovery objectives. <p>The report includes evidence of how the projects support the MTFS – identifying the community benefit outcomes, evidence of successful partnership working, evidence of robust performance management.</p>
It is clear what the decision is or what decision is being requested.	✓	<p>Section 4 of the HECA Report: ‘Delivery Mechanisms’ sets out the actions the Council intends to take to continue improving the energy efficiency of residential accommodation in the area.</p> <p>Section 5 of the report: ‘Delivery Performance’ provides evidence of the impact of the energy efficiency schemes available to residents.</p>

Community Impact Assessment

For decisions going to Cabinet, the CIA findings are reflected in the Cabinet Report and potential impacts are clearly identified and mitigated for (where possible).	✓	The HECA Report outlines the impact of the projects through Section 5 'Delivery Performance'.
The aims, objectives and outcomes of the policy, service or project have been clearly identified.	✓	This is detailed in Section 2 of the HECA Report 'Our Ambitions and Priorities'.
The groups who will be affected by the policy, service or project have been clearly identified.	✓	Section 3 of the HECA Report 'Data and evidence of need' outlines the groups who will be identified to benefit from the projects and the typical demographic that receives support through the projects.
The communities that are likely to be more adversely impacted than others have been clearly identified.	✓	Section 3 of the HECA Report 'Data and evidence of need' outlines the communities who will be impacted by the projects.
Engagement / consultation has been undertaken, and is representative of the residents most likely to be affected.	✓	Through the Warmer Homes Stafford programme, our specialist energy agency engages with residents and is able to identify the cohort(s) of people most affected / in need of warmer homes support. The findings of these engagements have been reflected in the report.
Appropriate evidence has been provided and used to inform the development and design of the policy, service or project. This includes data, research, engagement/consultation, case studies and local knowledge.	✓	The HECA Report includes national, regional and local data, research and performance data to inform the development and purpose of the report.
The CIA evidences how the Council has considered its statutory duties under the Equality Act 2010 and how it has considered the impacts of any change on people with protected characteristics.	✓	Evidence provided on pages 4-9 of the CIA.
The next steps to deliver the project have been identified.	✓	Section 4 of the HECA Report: 'Delivery Mechanisms' sets out the actions the Council intends to take to continue improving the energy efficiency of residential accommodation in the area.
Findings have been incorporated into the Cabinet report for consideration.	✓	The Cabinet report includes data concerning the energy efficiency and thermal quality of our residents' homes; the relationship between these and resulting levels of fuel poverty to provide evidence in support of the policy and the Council's warmer homes schemes.

Please return this completed CIA to Ella Smith: esmith@staffordbc.gov.uk

ITEM NO 4(a)(ii)**ITEM NO 4(a)(ii)**

Contact Officer:	Hayley Smith
Telephone No:	01785 619554
Ward Interest:	Nil
Report Track:	Cabinet 02/09/2021 (Only)
Key Decision:	Yes

**SUBMISSION BY COUNCILLOR J M PERT
COMMUNITY AND HEALTH PORTFOLIO**

**CABINET
2 SEPTEMBER 2021
Temporary Accommodation Out of Area Placement Policy**

1 Purpose of Report

- 1.1 To request approval for the adoption of the Temporary Accommodation Out of Area Placement Policy.

2 Proposal of Cabinet Member

- 2.1 To approve the Temporary Accommodation Out of Area Placement Policy.

3 Key Issues and Reasons for Recommendation

- 3.1 All local authorities are required to have a policy of how homeless households will be prioritised for temporary accommodation when there is either no suitable temporary accommodation available within the local authority area or there is no temporary accommodation in the area within the local authority district that the household would prefer to be placed. (Nzolameso v City of Westminster 2015).
- 3.2 Temporary accommodation is provided locally and Stafford Borough do not rely on out of area placements. The proposed policy is not a statement of intent but a required document should the authority be in a position where temporary accommodation needs to be sourced out of the Borough. There is no intention to change working practices as a result of this document and the authority will continue to provide, where reasonable and practical, suitable accommodation within the local authority area.

- 3.3 There will be some instances where temporary accommodation placements within the local authority area will not be suitable, for example for those at risk of domestic abuse or harassment and other violence. This policy will provide the framework for those decisions to be made.

4 Relationship to Corporate Business Objectives

- 4.1 Objective 2: To improve the quality of life of local people by providing a safe, clean, attractive place to live and work and encouraging people to be engaged in developing strong communities that promote health and wellbeing.

5 Report Detail

- 5.1 The full detail of the Temporary Accommodation Out of Area Placement Policy is contained within the **APPENDIX**; the next paragraphs set out the key elements.
- 5.2 All temporary accommodation placements are made on the basis of a comprehensive assessment of a household's circumstances and need. This is balanced against the needs of all households requiring temporary accommodation and the type and location of accommodation that is available at any given point.
- 5.3 The policy will prioritise those who have the greatest need to be accommodated within our Borough, taking into account:
- Affordability of available temporary accommodation;
 - Distance of temporary accommodation from the last settled address of the household, taking into consideration any possible disruption to employment, education, caring responsibilities, access to essential medical facilities and support that is essential to the wellbeing of any household member;
 - Accessibility of local amenities, services and transport.
- 5.4 The supply of temporary accommodation, including property type and location is regularly reviewed and reflects current service demand as far as is reasonably practical therefore decisions around prioritising local temporary accommodation will be minimal. The Policy provides us with discretion to provide temporary accommodation outside of Stafford Borough for households if it would be unsafe, or not practical, to house them on a temporary basis in the local area.
- 5.5 The implementation of the Domestic Abuse Act, which gives those fleeing domestic abuse priority need status, is likely to put increased demand on temporary accommodation and may necessitate placements in a location away from the perpetrator for safety reasons. Increased demand, the changing nature of demand, along with our temporary accommodation model, will be monitored in accordance with our current Homelessness and Rough Sleeper Strategy.

6 Implications

6.1 Financial	
Legal	Compliant with the Housing Act 1996 (as amended) along with relevant caselaw and policy changes.
Human Resources	Nil
Human Rights Act	Article 8, 'right to respect for his private and family life, his home and his correspondence' and the provision of suitable accommodation. Article 14 'protection from discrimination' around the provision of accommodation for protected characteristics.
Data Protection	Nil
Risk Management	Nil

6.2 Community Impact Assessment Recommendations	<p>The Borough Council considers the effect of its actions on all sections of our community and has addressed all of the following Equality Strands in the production of this report, as appropriate:-</p> <p>Age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation.</p>
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Previous Consideration - Nil

Background Papers - Homelessness and Rough Sleeper Strategy 19 January 2020
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Out of Area Temporary Accommodation Placement Policy

Introduction

This document sets out the Stafford Borough Council's policy for how homeless households will be prioritized for temporary accommodation (TA) when there is no TA available in:

- (a) The local authority area, or
- (b) An area within the local authority district that an applicant would prefer to be placed into to access for example, schools, place of work, family

The policy applies to all households placed in temporary accommodation by the Council under Section 188 *The Relief of Homelessness Duty* and Section 193 *The Main Homelessness Duty* arising out of the Housing Act 1996. It also applies to any accommodation:

- 1 Secured under a power to provide temporary accommodation pending a review or appeal.
- 2 Secured to meet any duty owed to an intentionally homeless household.
- 3 Secured to meet any interim accommodation duty pending the outcome of a local connection referral to another local authority.

This document should be read in conjunction with the Council's most recent Homelessness Strategy and action plan as this document sets out how the Council is seeking to develop more local temporary and permanent accommodation options to meet demand for households owed any duty under the Part 7 of the Housing Act 1996 as amended by the Homelessness Reduction Act 2017.

This out of area placement policy is compliant with the advice set by the Supreme Court in April 2015 for the case of *Nzolameso and Westminster Council*.

This Temporary Accommodation (TA) Out of Area Placement Policy seeks to ensure that all placements are made on the basis of:

- (a) A comprehensive assessment of a household's circumstances and needs, and
- (b) A balanced assessment of the needs of all households requiring temporary accommodation set against consideration of the type and location of accommodation that is available to be allocated at any given point

Our policy is to provide, wherever reasonably practicable, suitable accommodation within our Local Authority area and to consider a person's links to any area within our Borough, except in cases where there is a specific reason why the household should not be accommodated within our Borough (for example, applicants at risk of domestic violence or other violence). However, our ability to meet this policy objective is subject to the supply of suitable temporary accommodation being available.

The Council is making efforts to ensure that its temporary accommodation portfolio reflects the most common locations for applicants presenting as homeless in our Borough. We review our needs and will consider developing new schemes to increase the number of units in areas within our Borough where the evidence indicates there may be a shortage of temporary accommodation. However, inevitably we cannot always meet the requested location that an applicant presenting as homeless may wish to be temporarily housed in.

The Out of Area Temporary Accommodation Placement Policy

This policy is intended to ensure that we prioritise those who have the greatest need to be accommodated within our Borough.

In assessing the suitability of the location of any property to be used as temporary accommodation for a homeless household, the Council will consider whether the applicant can afford to pay for their temporary accommodation without being deprived of basic essentials such as food, clothing, heating, transport costs and all other reasonable expenditure. We will therefore take into account the rent that the household can afford as well as any additional costs, such as travel costs, resulting from the location of the accommodation.

The Council will also take account the distance of any offer of temporary accommodation from the last address they have presented as homeless. We will consider any possible disruption to employment, education or caring responsibilities, accessibility of essential medical facilities and support that are essential to the wellbeing of any household member, and accessibility of local amenities, services and transport.

An assessment of these matters will be completed when an applicant is being matched to any available temporary accommodation unit.

Any decision regarding an allocation of temporary accommodation will have regard to the Council's obligations under Section 11 of the Children Act 2004 including the need to both safeguard and promote the welfare of children.

This policy fully complies with the requirements of:

Sections 206, 208, and 210 of the Housing Act 1996 as amended by the Homelessness Reduction Act 2017.

- (a) The Homelessness (Suitability of Accommodation) (England) Order 2012.
- (b) Whether the accommodation is affordable.
- (c) The relevant sections of the DCLG Allocations and Homelessness.
- (d) The MHCLG Supplementary Guidance on the homelessness changes in the Localism Act 2011 and on the Homelessness (Suitability of Accommodation) (England) Order 2012 (November 2012) Applicants accommodated under this policy under section 193 of the Housing Act 1996 can request a statutory

review of the suitability of any accommodation offered to them, in accordance with section 202 of the Act.

- (e) Advice from the Courts to local authorities regarding when temporary accommodation is suitable including the leading case of *Nzolameso* and Westminster Council.
- (f) The Equalities Act 2010.

Guidelines on the Location of Accommodation

For the purposes of making an allocation, all units of TA that may be offered to an applicant owed a temporary accommodation duty will be categorised simply as:

‘Within the local authority area, or

‘Outside of the local authority area - Defined as Temporary Accommodation located ideally in a neighbouring authority but if this is not possible located no more than 1 hours travelling distance by public transport

Where there are insufficient units of temporary accommodation in this Council’s Geographical boundaries a suitable offer will be made outside of our area.

The Council may also keep aside local vacant units in anticipation of applicants presenting who meet the criteria for a local placement. This has been confirmed as a reasonable practice in the 2018 Court of Appeal case for *Adam and Alibkhiet v Westminster and Brent Councils*.

How we will prioritise households for an offer of temporary accommodation in our area where there are more applicants requiring a local area placement than properties available.

All households will be placed in accommodation in our area if a sufficient number of suitable units are available at the time of placement. Where there is a shortage of local units on any given day the Council may decide to keep aside a number of local vacant units in anticipation of applicants presenting who meet the criteria for a local placement.

If there isn’t a sufficient number of local temporary accommodation units available, a household will be placed in a suitable unit outside of our area, but as close to this local authority’s Borough as possible based on the practicality of sourcing units on any given day.

Relevant facts regarding the household’s circumstances will be gathered by officers in the course of their enquiries through completing their assessment of an applicant’s circumstances under section 189A of the Housing Act 1996.

Households will be given priority for a placement in area if they meet the following criteria. Please note this does not mean that they are guaranteed to receive an offer of ‘in area’ accommodation when any TA duty arises. It may be that at the time any temporary accommodation duty is owed there are no vacancies in area and, if this is

the case, an offer of suitable TA will be made as close as possible with priority given to any household that meets one or more of the criteria set out below, to be given a suitable offer of temporary accommodation within area as soon as is reasonably practicable to do so.

The 'in area placement criteria'

- 1 Households with one child (or more) in secondary school in their final year of Key Stage 4 (generally Year 11) with exams to be taken within the next six months. Wherever practicable we will seek to place such households within area and as close as possible to existing schools to minimise public transport travelling distance and costs.
- 2 Households with one child (or more) who has a Statement of Special Educational Needs who is receiving education or educational support in our area and where a change of schools would be extremely detrimental to their well-being because either the impact of moving on that child or that a similar package of support is unlikely to be available. Wherever practicable we will seek to place such households within area and as close as possible to existing schools to minimise public transport travelling distance and costs
- 3 Households with significant medical or severe learning disability where a child attends a special school. Wherever practicable we will seek to place such households within area and as close as possible to existing schools to minimise public transport travelling distance and costs
- 4 Households where one person (or more) has a severe and enduring mental health problem where they are receiving psychiatric treatment and aftercare provided by community mental health services **and** have an established support network in this area so that a placement outside of this area may severely impact on their well being.
- 5 Households where one person (or more) is in permanent and settled employment This group will be prioritised for temporary accommodation as close as possible to their workplace. Where this is not possible we will endeavor to place a household no more than 60 minutes by public transport away from their place of employment and will continue to seek suitable accommodation closer to their place of work.
- 6 Households who have a longstanding arrangement to provide care and support to another family member in the local area, and that person would be likely to require statutory health and social care support if that care and support ceased and there are no other relatives willing and able to provide that care and no other suitable alternative arrangements available.

Please note the following:

- 1 The above categories do not mean that no other special circumstances will be taken into account. Whenever an applicant is owed an interim or full temporary accommodation duty a full assessment will be carried out of their household's housing needs and circumstances. Following that assessment it may be decided that an applicant should qualify for a local area offer for a special reason despite not meeting the criteria set.
- 2 The time likely to be spent in the accommodation will also be taken into account when determining the suitability of any offer of temporary accommodation out of area.
- 3 Where there are no in area temporary accommodation units immediately available which meets the household's identified needs, a homeless household may be placed on an emergency basis into accommodation in any location where there is availability on that day as long as it has been assessed as being suitable.
- 4 Households in receipt of welfare benefits or who may be on a low income may be subject to restrictions on the amount of benefit they can receive, which may affect their ability to pay their temporary accommodation rent. Placement in a local area is subject to suitable accommodation being available that the applicant can afford.
- 5 Given the shortage of available properties, it may be required to make a decision regarding how to prioritise the allocation of a particular property on a particular day where more than one household requires TA and more than one household meets the local area criteria set out above. The following circumstances will be taken into account when prioritising between households. Please note the circumstances listed are not in descending order of importance and do not form an exclusive set of criteria as other factors may also be relevant:
 - Level of need relating to the welfare and safeguarding of any children in the household
 - Level of educational need
 - Identified risks posed by living in particular areas
 - Permanency/flexibility of employment
 - Access to transport
 - Level of need to be close to services and amenities
 - Level of need to be close to health services
 - Level of need to be close to support networks

- Level of need to be close to cultural or religious amenities
- Impact on caring responsibilities
- Affordability of the accommodation
- Impact of the relocation, and of occupying the accommodation on a continuing basis, on the well-being of household members
- Impact of the relocation, and of occupying the accommodation on a continuing basis, on the well-being of any children in the household, having regard to the Council's duty under the Children Act 2004 to safeguard and promote their well-being

The impact of these and any other relevant circumstances will be considered both individually and cumulatively.

Policy Adopted Date:

Policy Update	Date Changes Implemented	Approval

