



# NORWICH City Council

**Committee Name:** Cabinet

**Committee Date:** 19/10/2022

**Report Title:** Sustainable Warmth Strategy 2022 – 2025 and Action Plan

**Portfolio:** Councillor Hampton, Cabinet member for climate change and digital inclusion

**Report from:** Head of Strategy, Engagement and Culture

**Wards:** All wards

## **Purpose**

The purpose of the Sustainable Warmth Strategy 2022-2025 is to provide an overview of NCC's strategic approach to alleviating fuel poverty in Norwich, across all housing tenures. The associated action plan sets out specific actions to be delivered by the Council and its strategic partners. Both documents are appended to this paper.

## **Recommendation**

It is recommended that cabinet approve the Sustainable Warmth Strategy and Action Plan

## **Policy Framework**

The Council has five corporate priorities, which are:

- People live independently and well in a diverse and safe city;
- Norwich is a sustainable and healthy city;
- Norwich has the infrastructure and housing it needs to be a successful city;
- The city has an inclusive economy in which residents have equal opportunity to flourish, and
- Norwich City Council is in good shape to serve the city.

This Strategy meets the "People live independently and well in a diverse and safe city' corporate priority.

This report sets out how the following corporate plan commitment is fulfilled:

*'Update the Affordable Warmth Strategy ready for winter 2022. Then deliver the strategy and its action plan over the next three years' strategic action in the Corporate Plan'.*

## Report Details

1. The new Sustainable Warmth Strategy 2022-2025 is an update of the existing Affordable Warmth Strategy 2018-2021. The new Strategy provides an overview of our work to prevent and alleviate fuel poverty in Norwich over the next three years. The title of the Strategy has been changed to align with other sustainability objectives, workstreams and funding sources.
2. As set out above, this new strategy will help meet the corporate aim of '*People live independently and well in a diverse and safe city*'. Furthermore, this work will augment our new upcoming Equality, Diversity and Inclusion Strategy and the Non- Commercial Debt Policy. The corporate plan commits us to publish this updated Affordable/Sustainable Warmth strategy by November 2022.
3. Since the last Strategy was published in 2018, the Council has undertaken a wide range of work to help people overcome fuel poverty, including:
  - The average SAP<sup>1</sup> rating of council housing is above 70. This means virtually all homes have had significant energy saving interventions including loft insulation, either cavity or external wall insulation, double glazing and draft proofing.
  - We have successfully bid for £3.95m of external funding from the government's Social Housing Decarbonisation Fund and Sustainable Warmth Fund. This funding combined with £0.5m of Council funds is being used to improve the energy efficiency of over 200 homes in Norwich over the next 12 months.
  - Over the last five years, we have made energy efficiency improvements to over 1,800 properties to improve the affordability of warmth and improve living conditions.
  - 207 private sector homes have been made safe (including cold hazards).
  - We have leveraged over £170,000 in Eco Flex grants for Norwich householders.
  - We have helped more than 9,000 people switch to a reduced cost energy supply, including in 2019 launching *Roar Power*, our own white label energy supplier providing affordable access to clean energy tariffs.
4. This updated Strategy sets out a definition for fuel poverty, as well as its causes, impacts and scale in the city, and how we intend to tackle and reduce fuel poverty, particularly through the associated and ongoing Sustainable Warmth Action Plan.
5. Energy costs are inflating greatly and even with a government cap of £2.5k pa, for many residents of Norwich paying these will not be achievable, and we will see them making hard choices between heating and eating. Already 10% of excess winter deaths in England are directly due to cold homes.
6. Fuel poverty was at 13.2% in 2020 (fuel poverty data runs two years behind) with some commentators predicting that over half of households will be in fuel

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<sup>1</sup> SAP is the UK Government's Standard Assessment Procedure for calculating the energy performance of buildings.

poverty, in the eastern region, during the coming winter. Therefore, this strategy is vital in tackling this crisis.

7. We have created a new Sustainable Warmth Policy, as part of the development of this Strategy, which is *'To ultimately eradicate fuel poverty in Norwich within the timescale of the 2040 City Vision, and in the immediate term support vulnerable groups to manage and reduce the impacts of fuel poverty.'*
8. The Strategy acknowledges the positive impact on fuel poverty which results from significant improvement of housing energy performance and community wealth building, and so supports existing strategic Council initiatives aimed at tackling these longer-term contributing factors.
9. The Strategy sets out 2 strategic objectives which apply to households of all tenures:
  1. Provide support to vulnerable groups
  2. Ensure support and resources are targeted according to risk

Relating to the delivery of these objectives, 9 key (existing) workstreams are identified including workstreams which both prevent and alleviate fuel poverty, including:

- Applying for and managing the delivery of government grants to improve the energy performance of housing.
- Supporting residents to utilise ECO funding to install loft and cavity wall insulation in low-income households.
- Providing small scale measures through the Council's Warm and Well Initiative – such as insulation and 'Winter Well' packs which include thermal clothing, blankets and soup.
- Referring residents through the Council's Home Improvement Team – to receive support and funding to stay in their homes, particularly residents at risk of hospitalisation and in cold homes.
- Identifying and mitigating hazards in Private Sector households such as excess cold.
- Providing vulnerable residents with emergency fuel payments using charitable donations kindly donated by Benevolent Association for the Relief of Decayed Tradesman.
- Providing emergency heating support in the form of radiator loans to residents without central heating or where central heating has failed.
- Offering the collective switching scheme Norfolk Energy Switch. This scheme utilises an innovative reverse-auction approach and consistently delivers £200+ savings on energy bills for residents per year. Although due to the stagnancy of the switching market, this scheme is currently on pause it will be restarted as soon as switching becomes viable again.
- Offering energy advice and support to residents to enable access to appropriate funding for heating repairs (if available) and to reduce fuel debts and provide general advice around billing and energy efficiency.

10. An associated action plan has been drafted which will guide the delivery of objectives over the next three years, including specific KPI's for each key action.
11. The Strategy sets out the need for successful internal cross team/directorate working as well as the need for successful partnership working with external Strategic Partners. A schedule of external Strategic Partners is included in the Strategy.

### **Consultation**

12. A significant public consultation is deemed unnecessary. External strategic partners will be consulted with post adoption around the ongoing development and implementation of the action plan.
13. The communication of this strategy will sit within the wider cost of living communication plan, which is already in place and being updated regularly, to ensure joined up communications to those affected.

### **Implications**

#### **Financial and Resources**

Any decision to reduce or increase resources or alternatively increase income must be made within the context of the council's stated priorities, as set out in its Corporate Plan 2022-26 and budget.

The new Strategy neither increases or reduces cost or other resources compared to the previous Affordable Warmth Strategy 2018-2021. Several grants have been successfully applied for and are listed below, three of which are from BEIS (Department for Business, Energy & and Industrial Strategy).

14. Decayed Tradesman Benevolent Fund (GF):  
£5 – £7.5k pa depending on charity income for which NCC is very grateful, used to fund emergency payments and Warm and Well workstream.
15. Collective Switching and Solar Scheme (GF):  
£5 - £6k pa depending on level of resident interest, although switching schemes are currently paused this will be relaunched as soon as the energy market allows.
16. BEIS - Thermal Warmth Budget (HRA):  
£0.854m capital grant received in 2021/22, to be used to improve the energy performance of the Council's social housing stock with an additional £0.300m financed by NCC. A contract has been awarded to EON and is forecast to be spent by 31 March 2023.
17. BEIS - Sustainable Warmth (GF):  
£3.700m capital grant in 2022/23, used for improving energy performance in the private rented sector. Contract in place with EON and must be spent by 31 March 2023.

18. BEIS - Green Homes Grant (GF):

£0.715m capital grant received 2021/22 for insulation, low carbon heat, draught proofing etc., this includes a further £0.150m which was secured in addition to the original grant award with over £0.547m budgeted to be spent in 2022/23.

As projects evolve that support the strategy each one will be assessed through the development of a business case relevant to the size of the scheme and funding identified.

### Legal

19. There are no relevant statutory provisions to this work and no legal implications; the Council's general power of competence through the Localism Act 2011 allows it to undertake activities where there is no other specific legal power. Legal advice needed for any workstreams relating to this Strategy, including bidding for funding, will be sought on a project-by-project basis.

### Statutory Considerations

Consideration	Details of any implications and proposed measures to address:
Equality and Diversity	Equality Impact Assessment report appended
Health, Social and Economic Impact	Cold homes increase the risk of strokes and heart attacks. Cold conditions are also thought to lower resistance to respiratory infections and exacerbate asthma and chronic obstructive and pulmonary disease (COPD). Therefore reduction of fuel poverty is likely to have a positive impact on health.
Crime and Disorder	No implications
Children and Adults Safeguarding	Our action plan contains the commitment 'To continue to share appropriate information via the police, MASH (Multi Agency Safeguarding Hub) on children and vulnerable adults exposed to excess cold in line with safeguarding requirements.'
Environmental Impact	Any retrofitting work undertaken through this strategy will lead to carbon reduction in housing.

### Risk Management

Risk	Consequence	Controls Required
There are no significant risks associated with the Strategy		

### Other Options Considered

20. There are no other viable options. This Strategy fulfils our corporate commitment.

**Reasons for the decision/recommendation**

21. Our corporate plan commits us to 'Update the Affordable Warmth Strategy ready for winter 2022.' This strategy fulfils this requirement and will guide our important fuel poverty reduction work over the next three years. Therefore, the recommendation is to approve this Strategy.

**Background papers: None**

**Appendices:** Equalities Impact Assessment, Sustainable Warmth Strategy and Action Plan.

**Contact Officer: Affordable Warmth Officer**

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<b>What is being assessed</b>	Sustainable Warmth Strategy 2022 - 2025	<b>Status</b>	First assessment of revised policy
<b>Officer completing</b>	Rachel Sowerby	<b>Role</b>	Affordable Warmth Officer
<b>Team</b>	Environmental Strategy	<b>Directorate</b>	Community Services
<b>Senior leadership team sponsor</b>	Helen Chamberlin	<b>Role</b>	Head of Strategy, Engagement and Culture

**What are the main aims or purpose of the policy, practice, service or function?** *(include links to project briefs, cabinet reports etc)*

To outline our proposed work to reduce fuel poverty in Norwich from 2022 - 2025

**How does it fit with other services and policies, and how does it support our [corporate objectives](#) and [City Vision](#)?**

This report meets the People live independently and well in a diverse and safe city corporate priority

This report addresses 'Update the Affordable Warmth Strategy ready for winter 2022. Then deliver the strategy and its action plan over the next three years' strategic action in the Corporate Plan

The Environmental Strategy 2020 – 2025 sets out as Priority 4: 'to increase the energy efficiency of all housing stock in the city'

**What is the reason for the proposal or change (financial, legal etc)?** *The Equality Act requires us to make this clear.*

A new strategy is required as our current one has ended

**Who implements, carries out or delivers the policy, practice, service or function?** *(person/team/body and other organisations who deliver under procurement or partnership arrangements)*

The Affordable Warmth Officer within the Environmental Strategy team coordinates and leads on strategy delivery

**What outcomes do we want to achieve, why and for who?**

Reduction of fuel poverty in the city of Norwich. All residents can benefit from this.

## Equality Impact Assessment

The strategic objectives fall into two main categories, as follows:

- Providing support to vulnerable groups
- Ensuring support is targeted according to risk

**Will anyone be disproportionately affected by the programme, and/or will it create any benefits?** (*customers, employees, groups in the wider community etc*)

This will create benefits for residents in fuel poverty who will be supported. No residents will be disproportionately negatively affected.

**If yes, complete the relevant sections below for any benefits and adverse impacts identified.**

Affected group	Key findings from analysis of data and evidence. Identify any gaps in data here	Level & type of impact: low/medium/high, positive/adverse	Justifiable if adverse	Actions to mitigate impacts, maximise benefits or address identified gaps in data	By when
<b>Age</b>	Based on central government recommendations residents under 5 or over 65 have been identified as particularly vulnerable to cold homes	High, positive		Our vulnerability criteria includes age	Over the lifetime of the strategy
<b>Disability</b>	Based on Public Health England guidelines people with a disability have been identified as particularly vulnerable to cold homes	High, positive		Our vulnerability criteria includes people with health conditions made worse by the cold and/or receiving disability related benefits	Over the lifetime of the strategy
<b>Gender reassignment</b>					
<b>Marriage and civil partnership</b>					
<b>Pregnancy and maternity</b>	Based on central government recommendations pregnant residents have been identified as particularly vulnerable to	High, positive		Our vulnerability criteria includes pregnant people	Over the lifetime of the strategy

## Equality Impact Assessment

	cold homes				
<b>Race/ethnicity</b>					
<b>Religion and belief</b>					
<b>Sex/gender</b>					
<b>Sexual orientation</b>					
<b>Other groups</b>	Income is a driver of fuel poverty and therefore low income households are more likely to be in fuel poverty. This is reflected in the fuel poverty definition – Low Income, Low Energy Efficiency	High, positive		Our vulnerability criteria includes people on a low income and/or receiving means tested benefits	Over the lifetime of the strategy
<p><b>What evidence and data has been used for this assessment, including community engagement and consultation? (include links to data sources, consultations etc)</b></p> <p>Fuel Poverty Definition and Statistics – Department of Business, Energy and Industrial Strategy</p> <p>Local action on health inequalities: Fuel poverty and cold home-related health problems (Public Health England, 2014)</p>					
<p><b>How has the equality impact assessment informed or changed the proposal?</b> Vulnerability criteria includes protected characteristics</p>					
<p><b>What actions have been identified going forward?</b> Continue to support vulnerable people in Norwich at risk of fuel poverty</p>					
<p><b>How will the impact of your proposal and actions be measured moving forward?</b> Fuel poverty reporting by central government</p>					

## Equality Impact Assessment



<b>Officer completing assessment</b>	<b>Rachel Sowerby</b>	<b>Date</b>	<b>21/09/2022</b>
<b>Senior leadership team sponsor</b>	<b>Helen Chamberlin</b>	<b>Date</b>	<b>11/10/22</b>
<b>Equality lead (strategy team)</b>	<b>Helen Chamberlin</b>	<b>Date</b>	<b>11/10/22</b>

**Norwich City Council**

**Sustainable Warmth Strategy  
2022-2025**

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## 1. Foreword

1.1 Our Sustainable Warmth Strategy (hereafter ‘this Strategy’) is vital for leading and coordinating the numerous activities and relationships which reduce fuel poverty. Helping people escape fuel poverty, especially at this time of unprecedented energy cost increases, is a key corporate aim of Norwich City Council (hereafter ‘the Council’). This new Strategy has been renamed and was previously known as the Affordable Warmth Strategy.

1.2 Since the last Strategy was published in 2017 the Council has undertaken a wide range of work to help people overcome fuel poverty, as set out in the paragraphs below:

- Our ongoing energy efficiency housing retrofit programme is exemplary. 98 per cent of Council homes meet the Norwich Standard<sup>1</sup> and the average SAP rating<sup>2</sup> of council housing is above 70. This means virtually all homes meet current building regulations for existing properties including for loft insulation, either cavity or external wall insulation and draft proofing.
- In May 2018, local authorities and housing associations in Norfolk were awarded more than £3 million in Warm Homes funding to help homes without gas central heating. Through this we installed almost 100 new first time central heating systems on the Templemere estate in Norwich, at no cost to residents.
- During 2021/22 we successfully bid for £3.9m of funding from the government’s Social Housing Decarbonisation Fund and Sustainable Warmth Fund. This funding combined with £0.5m of Council funds is being used to improve the energy efficiency of over 200 homes in Norwich over the next 12 months.
- Over the last five years, we have made energy efficiency improvements to over 1,800 properties to improve the affordability of warmth and improve living conditions. Advice on household budgets is constantly available to support and help manage energy debt, via charitable trusts with which we’ve forged important relationships.
- We’ve also enabled the installation of energy-saving measures in private sector homes through our Cosy City scheme and small-scale improvements through our Winter Wellbeing programme. 207 private sector homes have been made safe (including cold hazards). We have leveraged over £170,000 in Eco Flex grants for Norwich householders.

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<sup>1</sup> Norwich Standard – Kitchens no more than 20 years old, bathrooms no older than 30 years, boilers no older than 15 years

<sup>2</sup> 70.6 average SAP rating

- In April 2022 we approved funding of £500k in Affordable Warmth Grants to replace old inefficient boilers. We anticipate around 65 households will benefit from this scheme. This replacement of gas boilers of greater than 15 years old saves both energy, cost to the householder and carbon emissions. Savings of 20-30% can be expected.
- We have helped more than 9,000 people switch to a reduced cost energy supply, including in 2019 launching *Roar Power*, our own white label energy supplier providing affordable access to clean energy tariffs.
- With regards the most vulnerable residents of Norwich, we have developed successful relationships with external partners to ensure a coordinated and effective approach. Our Winter Wellbeing conference has, for 7 years, brought key partners together to network, coordinate local schemes and receive training provided by the Council in partnership with National Energy Action (NEA) and Community Action Norfolk (CAN).<sup>3</sup>

1.3 These investments have paid dividends. Improving energy efficiency in whole communities, especially fuel poor households, not only greatly improves local health outcomes and living conditions, but it also improves prosperity by reducing utility bills *and* through the creation of local employment opportunities such as for providers of energy efficiency services and products.

1.4 But this strategy and other related strategies and workstreams to which it is linked, must now address the most severe and concerning increase in *both* fuel poverty and the cost of living. The Council is actively seeking to support communities in the short-term as well as develop longer-term solutions.

1.5 We must be bold, innovative and ambitious. We must lead not only local partners but also play a role in establishing a new approach to the eradication of fuel poverty. The benefits of this overarching approach are manifold and include the shift towards net zero carbon emissions and an equitable society.

Emma Hampton

**Councillor Emma Hampton**

**Cabinet member for climate change  
and digital inclusion**




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<sup>3</sup> In person events were disrupted by to the Coronavirus pandemic and will now recommence.

## 2. The Need and Context for this New Strategy

This section initially defines fuel poverty and then goes on to set out its scale, impacts, causes and relevant legislative and strategic frameworks.

### 2.1 Fuel poverty defined

In simple terms, a fuel-poor household cannot afford to keep their home adequately warm at a cost that is reasonable and affordable.

The government's current definition for a fuel poor household uses the low income, low energy efficiency (LILEE) indicators, as follows:

- Low Income – having a residual income<sup>4</sup> below the poverty line<sup>5</sup> *and*
- Lives in a home that has an energy efficiency rating below band C<sup>6</sup>

The government's definition, however, increasingly fails to predict and capture the scale of fuel poverty, as discussed below.

### 2.2 The causes of fuel poverty

At the time of writing this Strategy (during 2022), energy costs are inflating greatly and in doing so are changing the dynamics of fuel poverty. Recent data shows that 46%<sup>7</sup> of fuel poor households are not receiving qualifying benefits i.e., they are entering fuel poverty even though they are not low-income households. With regards energy efficiency, households are entering fuel poverty even though they occupy homes with good energy performance i.e., EPC band C<sup>8</sup> or above. For those already in poverty, the crisis has worsened significantly.

The factors which lead to fuel poverty, either individually or in combination, are:

- Poverty and low income - which in turn are caused by unemployment, low wages and insecure jobs, lack of skills, an ineffective benefit

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<sup>4</sup> Residual income is defined as equivalised income after housing costs, tax and National Insurance. Equivalisation reflects that households have different spending requirements depending on who lives in the property.

<sup>5</sup> The poverty line (income poverty) is defined as an equivalised disposable income of less than 60% of the national median.

<sup>6</sup> An energy performance rating is a rating of how energy efficient a property is. The certificates are graded on a scale of A (most efficient) to G (least efficient).

<sup>7</sup> Annual Fuel Poverty Statistics Report, 2020 data (BEIS, 2022)

<sup>8</sup> An Energy Performance Certificate (EPC) includes a rating of how energy efficient a property is. The certificates are graded on a scale of A (most efficient) to G (least efficient).

system, high costs and family problems<sup>9</sup>. Poverty has also recently been exacerbated by the loss of Universal Credit uplift.

- Fuel cost inflation - which is due to several factors, including:
  - Increasing global demand for finite fossil fuel reserves
  - Reduced supply due to war and other geopolitical constraints
  - Increasing cost of redressing climate change as renewable and low carbon energy infrastructure often requires higher capital expenditure than fossil fuels, although the longer-term costs to society as a whole are less<sup>10</sup>
  - The cost of energy to the most vulnerable people being higher than those who are more able to pay
- Energy inefficient homes – most of the housing in the UK was built at a time when energy was sufficient and affordable; although not environmentally sustainable. Applying all conventional energy efficiency measures to a home, such as loft and cavity wall insulation, are now less able to prevent energy poverty. This is particularly true for households with low income.
- Unnecessary consumption of energy including under-occupancy of dwellings.

### 2.3 The scale of fuel poverty

Reports published by BEIS in 2022<sup>11</sup>, using data from 2020, showed that at that time in England 13.2% households are in fuel poverty, equating to 3.16m dwellings. More than 2m households in the UK could not afford to heat their homes sufficiently even though a member of the household was in work. In Norwich in 2020, 12.3% of households were experiencing fuel poverty which equated to 7,804 dwellings<sup>12</sup>.

At the time of writing the country is going through an unprecedented cost of living crisis with inflation at a generational high, with forecasts predicting very significant energy price inflation over the winter of 2022/23. Some commentators<sup>13</sup> are predicting that over half of households will be in fuel poverty, in the eastern region, during the coming winter.

The graph below<sup>14</sup> shows fuel poverty in 2020 in each Norwich Ward. This and other data, such as excess winter deaths, will be developed and updated

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<sup>9</sup> According to *UK Poverty: Causes, Costs and Solutions* Joseph Roundtree Foundation

<sup>10</sup> According to the *Stern Review of the Economics of Climate Change*, 2006

<sup>11</sup> Government department of Business, Energy and Industrial Strategy

<sup>12</sup> Annual Fuel Poverty Statistics Report, 2020 data (BEIS, 2022)

<sup>13</sup> <https://cpag.org.uk/news-blogs/news-listings/fuel-poverty-estimates-uk>

<sup>14</sup> Data from Norfolk Insight – 2020 data

as part of the associated Action Plan to effectively target resources at areas of greatest need.

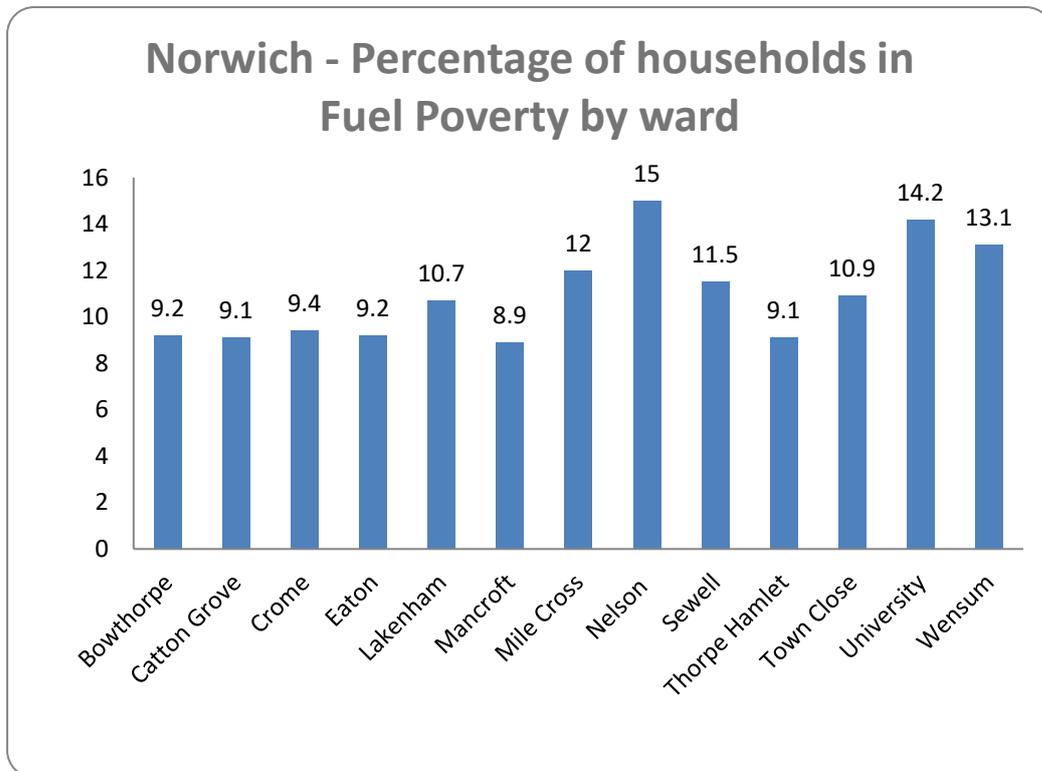


Figure 1: Norwich Fuel Poverty by Ward 2020

## 2.4 Impacts of fuel poverty

Fuel poverty has a range of negative impacts including:

- Worsening health – cold homes increase the risk of strokes and heart attacks. Cold conditions are also thought to lower resistance to respiratory infections and exacerbate asthma and chronic obstructive and pulmonary disease (COPD).
- Excess winter deaths – during the months of December to March, the number of deaths recorded nationally exceeds the average death rate for the remainder of the year. A significant number of these are thought to be linked to cold conditions particularly amongst the elderly.

Out of 30 major European countries, the UK has the sixth-worst long-term rate of excess winter deaths. 10 per cent of these excess winter deaths are directly attributable to fuel poverty<sup>15</sup>. In 2019-2020 this represented 8,500 people dying due to cold homes<sup>16</sup>. Many of the health impacts of fuel poverty are preventable and, in addition to the benefits to

<sup>15</sup> Local action on health inequalities: Fuel poverty and cold home-related health problems (Public Health England, 2014)

<sup>16</sup> New ONS figures reveal cold homes death toll (National Energy Action, 2020)

the individuals themselves, could result in significant savings in health-care costs.

- Increased accidents – mobility and dexterity lessen when people are cold which increases the risk of falls and injury as well as potentially affecting arthritis.
- Social exclusion – people can be reluctant to invite friends to their homes when they are cold, which can result in increased social isolation.
- Dilapidation of property – inability to heat homes can lead to issues such as dampness and freezing pipes, increasing maintenance costs for the owner.

## 2.5 Legislative and strategic frameworks

The following government targets have been set to redress fuel poverty:

- As many fuel poor homes as is reasonably practicable, meet an EPC<sup>17</sup> rating of D or above by 2025<sup>18</sup>.
- As many fuel poor homes as is reasonably practicable, meet an EPC rating of C or above by 2030<sup>19</sup>.
- All homes meet an EPC rating of C or above by 2035, where practical, cost-effective and affordable<sup>20</sup>.

These targets are based on EPC ratings for fuel poor homes rather than a specific fuel poverty level.

The Climate Change Committee recommends that all rented homes meet an EPC rating C or above by 2028. The Government published proposals<sup>21</sup> in September 2020 to require all privately rented homes to meet an EPC rating of C or above by 2028. This would apply to all new lettings from 2025.

A more comprehensive list of related government policies, strategies and plans is included in Appendix Section 9<sup>22</sup>.

## 2.6 Housing statistics and relevant data

Fuel poverty statistics show that social housing, such as council housing and housing provided by registered housing providers<sup>23</sup>, has higher SAP ratings

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<sup>17</sup> An Energy Performance Certificate (EPC) is a rating of how energy efficient a property is. The certificates are graded on a scale of A (most efficient) to G (least efficient).

<sup>18</sup> HM Government Cutting the cost of keeping warm: A fuel poverty strategy for England 2015

<sup>19</sup> BEIS Sustainable Warmth - Protecting Vulnerable Households in England February 2021

<sup>20</sup> HM Government Clean Growth Strategy 2017.

<sup>21</sup> BEIS Improving the Energy Performance of Privately Rented Homes in England and Wales 2020

<sup>22</sup> These have been adapted from the website of South Tyneside Council to whom the Council is grateful

<sup>23</sup> Register Housing Providers were previously known as Housing Associations

than other sectors, and lower levels of fuel poverty than the private rented sector<sup>24</sup>. This suggests that work done by councils and Registered Housing Providers reduces the scale of fuel poverty amongst their tenants and in particular decreases costs associated with heating.

At a national level 18.7% of households in social housing are in fuel poverty, compared to private sector landlords where 25 % of residents are fuel poor. 8.4% of owner occupier households are in fuel poverty<sup>25</sup>.

In Norwich, households by tenure type are shown in the table below.

Owner Occupied	Privately Rented	Rented from the Council	Rented from Registered Providers	Total
43.9%	21.7%	25.2%	7.4%	98.2%*

\*Remaining 1.8% made of shared ownership (0.7%) and living rent free (1.1%)

### 3. Council Policy and the 2040 City Vision

Norwich City Council has created a new Sustainable Warmth Policy, as part of the development of this Strategy, which is:

*To ultimately eradicate fuel poverty in Norwich within the timescale of the 2040 City Vision, and in the immediate term support vulnerable groups to manage and reduce the impacts of fuel poverty.*

This Strategy supports the Council’s corporate aim of:

*‘People live independently and well in a diverse and safe city’.  
It helps meet our 2040 city vision to be ‘A liveable city’.*

### 4. Aims and Scope of this Strategy

The aims of this Strategy are to highlight the issue of fuel poverty and its impact on the residents of Norwich, and to:

- a) Inform the development and implementation of a Sustainable Warmth Action Plan;
- b) Establish and quantify the need for external funding to meet the objectives;

<sup>24</sup> Fuel Poverty Detailed Statistics (BEIS, 2018)

<sup>25</sup> Fuel Poverty Details Statistics (BEIS, 2022 – 2020 data)

- c) Set out the generalities of the Council's approach to delivering its Sustainable Warmth policy commitment
- d) Set out how the Council will provide leadership and coordinate services of the Council, its contractors and partners, and enable a reduction of fuel poverty in Norwich.
- e) Provide assurance about how the relevant parts of the 2040 City Vision will be realised

This Strategy covers homes in the owner occupied, privately rented and homes rented by the council and Registered Housing Providers in the city.

It is envisaged that this Strategy is reviewed and amended every 3 years to ensure it continues to meet these strategic aims, or as required.

## **5. The Strategic Objectives**

This section sets out the strategic objectives and summarises the actions required to reduce fuel poverty in Norwich. The actions summarised here are developed further in the associated Action Plan.

The strategy acknowledges the positive impact on fuel poverty which result from significant improvement of housing energy performance and community wealth building, and so supports existing strategic Council initiatives aimed at tackling these longer-term contributing factors.

The strategic objectives fall into two main categories, as follows:

- Providing support to vulnerable groups
- Ensuring support is targeted according to risk

The sections below set out the individual workstreams which will be focused upon to reduce fuel poverty in Norwich.

### **5.1 Provide support to vulnerable groups**

Norwich City Council will support households in fuel poverty through a range of initiatives including:

- a) Applying for and managing the delivery of government grants to improve the energy performance of housing;

- b) Supporting residents to utilise ECO funding<sup>26</sup> through the Council's Cosy City scheme ([www.cosycity.co.uk](http://www.cosycity.co.uk)) to install loft and cavity wall insulation in low-income households;
- c) Providing small scale measures through the Council's Warm and Well Initiative, – such as insulation and 'Winter Well' packs which include thermal clothing, blankets and soup;
- d) Referring residents through the Council's Home Improvement Team – to receive support and funding to stay in their homes, particularly residents at risk of hospitalisation and in cold homes;
- e) Identifying and mitigating hazards in Private Sector households such as excess cold, which are set out in the Housing Health and Safety Rating System, introduced under the Housing Act 2004. This system enables the Council to identify and protect tenants against health hazards relating to poor quality housing.
- f) Providing vulnerable residents with emergency fuel payments using charitable donations kindly donated by Benevolent Association for the Relief of Decayed Tradesman, and signposting to other sources of emergency fuel payments.
- g) Providing emergency heating support in the form of radiator loans to residents without central heating or where central heating has failed
- h) Offering the collective switching scheme Norfolk Energy Switch. This scheme utilises an innovative reverse-auction approach and consistently delivers £200+ savings on energy bills for residents per year. At the time of writing, due to the stagnancy of the switching market, this scheme is on pause. It will be restarted as soon as switching becomes viable again.
- i) Offering energy advice and support to residents to enable access to appropriate funding for heating repairs (if available) and to reduce fuel debts and provide general advice around billing and energy efficiency.

The support measures detailed in (a) to (f) are means tested and the measures (g) and (h) are available for all residents.

## **5.2 Ensure support and resources are targeted according to risk**

Some fuel poor households are more at risk from the impacts of living in a cold home than others, even if they are not necessarily the most severely fuel poor.

In tackling fuel poverty, careful risk assessment must be undertaken to ensure limited funds are most effectively deployed. For example, vulnerable groups

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<sup>26</sup> Energy Company Obligation funding – this funding is paid for by energy companies and is used to install energy efficiency measures

include people who are 65 or older and whilst the Winter Fuel Payment continues to be targeted at pensioners, less than 10% of this group being in fuel poverty<sup>27</sup>.

Based on information presented in the Fuel Poverty Strategy for England, we consider the following low-income households to be likely to be vulnerable, if at least one member of the household is:

- 65 or older
- Younger than school age.
- Living with a long-term health condition which makes them more likely to spend most of their time at home, such as mobility conditions which further reduce ability to stay warm.
- Living with a long-term health condition which puts them at higher risk of experiencing cold-related illness – for example, a health condition which affects their breathing, heart or mental health.

In conjunction with these risk factors the Council will use data relating to areas of high fuel poverty, wider deprivation and poor housing, to target service delivery at households that are in most need.

The method for targeting resources recommended by this Strategy is the method set out in the Eco Flex Statement of Intent, which is available [online](#).

## 6. Taking an Integrated Strategic Approach

As set out in Section 5 above, the key *long-term* solutions to reducing and eradicating fuel poverty lie in:

- Increasing household income by ensuring our local communities and local economies thrive, and
- Improving the energy efficiency of homes

These outcomes are central to the 2040 City Vision and specifically related to the following strategies and plans:

- Environmental Strategy 2020 – 2025 which sets out as Priority 4, to increase the energy efficiency of all housing stock in the city<sup>28</sup>

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<sup>27</sup> Committee on Fuel Poverty, Annual Report. 2021.

<sup>28</sup> Priority 4 of the Environmental Strategy 2020-2025

- Environmental Action Plan 2022-2030 with further develops Priority 4 by establishing the principles for a city-wide energy efficiency and net zero retrofit plan<sup>29</sup>
- Strategies and plans relating to reducing inequality including the Council's upcoming Equality, Diversity and Inclusion Strategy and the Non-Commercial Debt Policy, and the Council's responses to the work of the Good Economy Commission.

By understanding the dependencies, linkages and co-benefits between strategies and plans, resources can be used effectively, and the quality of outcomes improved.

## 7. Management and Assurance

The delivery of this Strategy its associated Action Plan will be coordinated by the Affordable Warmth Officer. Other Council teams with linkages to this Strategy include:

- Specialist Support Team – who provide multi-faceted interventions for particularly vulnerable residents;
- Income Team and money advisors – providing budgeting advice for residents;
- Home Improvement Team – helping residents improve private sector homes and supporting them to stay in their accommodation;
- Private Sector Housing Team – enforcement actions against landlords with Category 1 Hazards (including excess cold);
- Customer Contact Team – recognising and referring onwards residents who are in, or at risk of being in, fuel poverty, and
- Estates and Asset Management – monitoring and improving energy performance in council houses.

The success of this Strategy and its Action Plan will be measured using following key performance indicators:

- The number of households in fuel poverty in Norwich;
- Number of private households where council activity helped to improve the energy efficiency of their homes;
- Number privately-owned homes made safe (including cold hazards);
- Number of council properties meeting the Norwich Standard and;

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<sup>29</sup> At the time of writing, the Environmental Action Plan is being developed.

- EPC rating of council homes.

Progress will also be communicated regularly to staff through a range of internal communications. This strategy will be publicly available through our website [www.norwich.gov.uk](http://www.norwich.gov.uk) and supported by external communications to support awareness-raising of fuel poverty issues in the wider city.

## **8. Working in Partnership**

The Council acknowledges that it cannot meet the aims and objectives of this Strategic alone. It commits to lead in reducing the impacts of fuel poverty and in doing so recognises the importance of successful partnerships and collaborative working.

Partner organisations include:

- The Healthy Norwich partnership - a partnership of Norwich City Council, Norfolk County Council's public health service and the Norwich Clinical Commissioning Group
- Age UK
- Community Action Norfolk
- Citizens Advice Bureau
- Other Norfolk LA's
- Norwich Older Peoples Forum
- Other registered housing providers such as Broadland Housing, Cotman Housing
- Royal Voluntary Service
- Norfolk Community Law Service

## 9. Appendix

### 9.1 Relevant Government Policies, Strategies and Plans

Fuel Poverty Strategy for England titled *Sustainable Warmth: Protecting Vulnerable Households in England*. It sets out how the government will tackle fuel poverty, while at the same time decarbonising buildings, so that those in fuel poverty are not left behind on the move to net zero, and, where possible, can be some of the earliest to benefit.

The Clean Growth Strategy sets out proposals for decarbonising all sectors of the UK economy through the 2020s, including tackling fuel poverty and improving the energy efficiency of homes.

The Energy White Paper addresses the transformation of the UK's energy system, promoting high-skilled jobs and clean, resilient economic growth, delivering net-zero emissions by 2050. It also commits to consulting on regulatory measures to improve the energy performance of owner-occupied homes. Government is consulting on how mortgage lenders could support homeowners in making these improvements.

The government will change Building Regulations so that from 2025 the Future Homes Standard will deliver homes that are zero-carbon ready. Homes will be fitted with low carbon forms of heating. A full technical specification for the Future Homes Standard will be consulted on in 2023. Legislation will be introduced in 2024, ahead of implementation in 2025.

The aim of the Future Buildings Standard is to further amend Building Regulations to improve the energy efficiency and sustainability of new and renovated buildings. It proposes to create a new requirement aimed at reducing the risk of overheating in homes, plus proposes more stringent requirements for ventilation and energy efficiency when existing homes are renovated or when doors, windows or heating appliances are replaced.

The Ministry of Housing, Communities and Local Government (MHCLG) are currently reviewing the Housing Health and Safety Rating System (HHSRS). It is the risk assessment tool used by local authorities to assess hazards in residential properties, including excess cold. The Department for Business, Energy & Industrial Strategy (BEIS) and MHCLG will work together to ensure

the HHSRS review takes account of the most up to date evidence on cold homes and aligns with wider Government aims on energy efficiency and fuel poverty.

Government is consulting on updating the domestic Minimum Energy Efficiency Standards (MEES) for landlords in the Private Rented Sector; including raising the minimum energy performance standard to Energy Performance Certificate (EPC) Band C.

The Climate Change Committee (who advise the Government on decarbonisation) said in their Net zero report that 'addressing fuel poverty should continue to be a priority'.

The Commons Business, Energy and Industrial Strategy Committee's report on Energy efficiency: building towards net zero provided some estimates of the impact of energy efficiency on various sectors:

- Energy savings: total energy use could be reduced by an estimated 25% by 2035 through cost-effective investments in energy efficiency and low carbon heat.
- Cutting energy bills: Energy efficiency measures have already saved households around £290 per year since 2008. Reducing total energy use by 25% by 2035 would result in average energy savings for consumers of roughly £270 per household per year.
- Jobs: Similar scenarios suggest that between 66,000 to 86,000 new jobs could be sustained annually across all UK regions.
- Economic Growth: This 'cost-effective' approach would require an estimated £85.2 billion investment but would deliver benefits (reduced energy use, reduced carbon emissions, improved air quality and comfort) totalling £92.7 billion - a net present value of £7.5 billion.
- Optimises infrastructure investment: Energy efficiency can prevent expensive investments in generation, transmission and distribution infrastructure and reduce reliance on fuel imports - with a present value of avoided electricity network investment of £4.3 billion.
- Competitiveness: The UK is a net exporter of insulation and energy efficiency retrofit goods and services.
- NHS savings: Reduced NHS costs of roughly £1.4 billion each year in England alone. The health service is estimated to save £0.42 for every £1 spent on retrofitting fuel poor homes.
- Air quality: The present value of avoided harm to health is calculated at £4.1 billion in accordance with HM Treasury guidance.

Plan for Jobs - outlines how the government will boost job creation to secure economic recovery from coronavirus, including supporting and creating jobs that facilitate making homes greener, warmer and cheaper to heat.

The ten-point plan for a green industrial revolution sets out the approach government will take to support green jobs and accelerate the nation's path to net zero.

The Social Housing White Paper includes discussion about improving energy efficiency, decarbonisation and the need to tackle fuel poverty. It announced a review of the Decent Homes Standard. The review will consider how the standard can work to better support energy efficiency and the decarbonisation of social homes.

The Conservative Party's 2019 Manifesto included a commitment to help lower energy bills by investing in the energy efficiency of homes.

Mitigating and adapting to climate change is expected to present economic challenges and opportunities as the UK seeks to pursue 'green growth'. The Government sees green finance as central to this transition. This is discussed further in the Government's 2019 Green Finance Strategy.

The Queen's speech briefing document reiterated the commitment to ensuring lower energy bills by investing in the energy efficiency of homes.

New guidance for landlords of Houses in Multiple Occupation (HMO) will be published to clarify when an EPC is required and when the Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015 apply to HMO.

The House of Commons Environmental Audit Committee has said that the UK's legally binding climate change targets will not be met without the near-complete elimination of greenhouse gas emissions from UK building stock by 2050. The retrofit of the existing housing sector needs much greater focus and is at risk of letting the rest of the economy down on decarbonisation. Several recommendations for policy changes are made including that the Government should bring forward the allocation of the £3.8bn of funding (Social Housing Decarbonisation Fund) pledged before the 2019 general election. This would deliver cost savings at scale. This funding should be frontloaded to reap the benefits of cumulative emissions savings towards net zero.

In addition, a range of measures are currently available to help alleviate fuel poverty including:

- At the time of writing the government are operating a Green Homes Grant Local Authority Delivery (LAD) scheme; local authorities can bid

for funding under this scheme to improve the energy efficiency of low-income households in their area.

- The Energy Company Obligation (ECO) is a government energy efficiency scheme to help reduce carbon emissions and tackle fuel poverty. The ECO3 scheme consists of one distinct obligation: The Home Heating Cost Reduction Obligation (HHCRO). In order to benefit from ECO residents must own their own home or have the permission of their landlord, including if their property is owned by a social housing provider or management company. ECO3 is focused on low-income, vulnerable and fuel poor households.
- The Social Housing Decarbonisation Fund (SHDF) covers a 10-year period and has been designed to improve the energy performance of social rented homes, on the pathway to Net Zero 2050. The SHDF aims to deliver warm, energy-efficient homes, reduce carbon emissions and fuel bills, tackle fuel poverty, and support green jobs. The SHDF supports the aims of the Prime Minister's Ten Point Plan for a Green Industrial Revolution.
- The Warm Homes Discount scheme. Under the scheme, medium and larger energy suppliers support people who are living in fuel poverty or a fuel poverty risk group. Some smaller suppliers also voluntarily participate in part of the scheme. The scheme targets fuel poor households, through a rebate of £140. The Energy White Paper commits to extending the scheme until at least 2025/26 and government will consult on reforms to the scheme to better target fuel poverty.
- The ten-point plan for a green industrial revolution announced the introduction of the Home Upgrade Grant. Government have committed £150 million to help some of the poorest homes become more energy efficient and cheaper to heat with low-carbon energy. The Home Upgrade Grant will support low-income households with upgrades to the worst-performing off-gas-grid homes in England. These upgrades will create warmer homes at lower cost and will support low-income families with the switch to low-carbon heating, contributing to both fuel poverty and net zero targets.

## Sustainable Warmth Action Plan 2022-2025

September 2022 Version 1.0

No	Key action/projects	Aim	Key activities	Responsibility	Delivery (Timescale)
1	To continue to operate the Council's white label energy company Roar Power to provide an affordable energy offer to citizens	Maximise household income and prioritise household costs	To promote our white label energy company	Environmental strategy team and communications team	Ongoing
2	To carry out appropriate housing energy advice and support activities on how to achieve affordable warmth through lifestyles changes, accessing cheaper energy tariffs such as through collective switching and taking advantage of government grants to improve the energy efficiency of people's homes.	Reduce energy consumption through low-cost measures	To improve the energy efficiency of 165 homes through council activity	Environmental strategy team	Ongoing throughout the strategy.
3	To explore low-cost solutions for heating controls, including the potential for digitalisation	Reduce energy consumption through low-cost measures	To take advantage of digitalisation projects where available	Environmental strategy team and property team	Ongoing throughout the strategy
4	To identify privately-owned homes where an excess cold hazard exists and to take appropriate action to remove the hazard. This may include the use of improvement notices in the case of privately rented accommodation and financial assistance for vulnerable owner-occupiers.	Improve the energy efficiency of homes	To work with the private sector housing team to reduce cold hazards in Norwich	Private sector housing team	Ongoing throughout period of strategy
5	To work to improve the council's housing stock to support energy efficiency and affordable warmth	Improve the energy efficiency of homes	To improve the energy performance of council homes in Norwich as much as practicably possible	Property team	Ongoing throughout period of strategy
6	Review and update Norwich Standard to	Improve the energy	To deliver scheduled	Property team	Ongoing

	continue to build homes which adopt a collaboration of basic principles, such as fabric first, and today's construction techniques, such as Passivhaus	efficiency of homes	housing developments		throughout period of strategy
7	To investigate new and emerging micro generation technology and funding for energy efficiency that can support affordable warmth activities	Improve the energy efficiency of homes	100% of new micro generation installations apply for relevant subsidies and, where appropriate, funding to install	Environmental strategy team and property team	Ongoing
8	Promote the development of a climate action plan and citywide retrofit plan	Improve the energy efficiency of homes	To publish a climate action plan and citywide retrofit plan	Environmental strategy team, property team and communications team	Ongoing
9	Identify external sources of funding that could be accessed to support sustainable warmth work e.g. to pay for winter warmth packs, heating repairs and heating upgrades for the most vulnerable residents etc	Provide support to vulnerable groups	To apply for one source of external funding (minimum) per year	Environmental strategy team	Ongoing throughout period of strategy depending on opportunities.
10	To provide appropriate awareness training to employees and contractors to recognise the signs of ill health caused by fuel poverty	Provide support to vulnerable groups	To provide our multi agency networking event (Winter Wellbeing) annually	Environmental strategy team	Ongoing throughout the strategy.
11	To continue to share appropriate information via the police, MASH (Multi Agency Safeguarding Hub) on children and vulnerable adults exposed to excess cold in line with safeguarding requirements.	Provide support to vulnerable groups	To continue to share appropriate information via the police, MASH (Multi Agency Safeguarding Hub) and Norwich Early Help Hub partners on children exposed to excess cold in line with safeguarding	Council employees with safeguarding responsibilities	Ongoing throughout period of strategy

			requirements.		
12	To develop and carry out a focused external and internal communications campaign leading up to each winter to make the public, employees, and contractors more aware of fuel poverty issues and how advice and support can be accessed through different communication methods eg articles in council publications (Citizen/ TLC)	Ensure support and resources are targeted according to risk	To deliver a three month winter wellbeing campaign	Environmental strategy team and communications team	Ongoing throughout the strategy.
13	To update our current Eco Flex Statement of Intent in line with ECO 4 and re-evaluate income thresholds	Ensure support and resources are targeted according to risk	To have a updated Eco Flex statement when ECO4 launches	Environmental Strategy team	March 2023