

Appendix B– Responses to draft Delivering Warmer Homes (HECA) report

Comments from public consultation	Response
<p>Q1. Do you agree with the Strategic Aims set out in the Introduction (p.4)?</p> <p>Yes = 2</p> <p>No = 0</p>	
<p>Q1 comments</p> <p>Electricity is typically generated at a thermal efficiency of 30% which makes it a very inefficient fuel for use in home heating - the comments in "Energy costs" on alternatives to conventional power generation are irrelevant to this discussion.</p> <p>Am uncomfortable about the redefinition of "fuel poverty" - it will make year-to-year comparisons difficult and will encourage misrepresentation by governments (like with CPI and RPI).</p> <p>The draft gives some recognition to Harrow's housing stock - high % of pre-war semis with solid walls, which are difficult/uneconomic to insulate effectively (as with much of suburban London). But it goes on to quote figures from the CMO's report, which are based on the national situation, with more easily insulated properties. Harrow are unlikely to achieve these and a report to the S of S for E&CC should identify this and emphasise it.</p>	<p>The comment on the use of electricity for heating is accepted but does not affect the overarching reality of the section on energy costs. These are expected to continue to rise</p> <p>The change in definition will be a national government decision and one which the council cannot influence</p> <p>It is difficult to translate national statistics (such as the CMO's report) back down to local areas. However the report is trying to highlight that having a high proportion of solid walls presents an opportunity to attract ECO funding into the borough.</p>
<p>Q2. Do you agree with our analysis of the challenge set out in section 3?</p> <p>Yes = 2</p> <p>No = 0</p>	
<p>Q2 comments</p> <p>Agree that the energy market is a challenge - we were promised great benefits when the energy market was privatised but have ended up with a cartel with confusion marketing - so some help under the Cheaper Energy Together scheme will be useful.</p>	<p>Cheaper Energy Together is a fuel switching scheme. The report has concentrated on measures to reduce energy consumption and carbon emissions.</p> <p>There may be some merit in pursuing a community energy switching programme at a later date.</p>

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<p>Would be useful to explain solid wall insulation in some detail. Harrow Council have insulated 1920's housing stock in this way - rectangular buildings on estates where tenants can be moved out are relatively easy to insulate economically - some of the necessary work involves sills, eaves, gutters and down-pipes. Single semis in private ownership, with bay windows introduce much more complexity and cost. This building work is necessary for the insulation to be successful, and needs to be done as well as the insulation work.</p> <p>Some brickwork is an attractive feature, which will be lost under the render which is used over the insulation.</p> <p>Internal insulation does take up space inside the house - possibly foil multi-layer insulation (has been used at the Bernays Institute) would be less intrusive?</p> <p>The advise on "heating controls" is true but leaves much un-stated. They can give greater control, but will do so only if they have been specified sensibly, installed accurately, are easy to operate, and the householder understands how to use them to best advantage.</p>	<p>BOX 1 sets out the basic concept behind solid wall insulation – both internal and external. For the purposes of this report, the council does not consider that additional detail is necessary.</p> <p>However it is accepted that details for each scheme will need to be properly thought through to ensure that the work is successful completed and the desired outcomes achieved.</p> <p>It is possible to provide brick slips to render to maintain the appearance. However this does add cost to the scheme. This would normally only be carried out in conservation areas where external appearance is particularly important</p> <p>There are a number of proprietary systems that can reduce the thickness of internal insulation. These are generally more expensive.</p> <p>Accepted. Any schemes would need to include a requirement that schemes are easily understood and practical. Residents will need to understand how such systems operate .</p>
<p>Q2 comments</p> <ol style="list-style-type: none"> 1. Housing Benefit section needs completing. 2. Changing Behaviour - 9000 homes represents some 11% of households/ homes? Put number in context 3. Housing Conditions - In table 3.1 show also EPC band and approx. no. of houses of each type to get indication of scale. 27000 homes represents 34% of households - has this been mapped? Would this then give a first order indication of the EPC profile in Harrow for targeted action? <p>Council Housing is only 6% of housing stock. EPC/SAP not known for</p>	<p>This section has been re-written and expanded</p> <p>Text altered to show percentages.</p> <p>We have arranged funding to obtain the detailed EPC data from DECC.</p> <p>Knowing the split for council housing is important as this is directly</p>

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<p>1/3rd. i.e. 2% of total - not significant overall. Table 3.2 - show total 4969 homes.</p> <p>Re 58% of homes with solid walls - how are terraced houses recorded? One could argue that focus should be end of terraces houses?</p>	<p>under the council's control and the stock could act as an important pump primer for the project as a whole</p> <p>This split is not known. The industry may wish to concentrate on end of terrace as this will give larger savings. However the council's aim is to ensure that as many properties as possible are retrofitted – not just the easy wins.</p>
<p>Q3. Do you agree that a fifteen year programme is reasonable, ambitious enough and deliverable?</p> <p>Yes = 0</p> <p>No = 1</p>	
<p>Q3 comments</p> <p>Besides heating controls (above), all energy-efficient materials and services, equipment, controls etc. will only deliver the performance they are capable of if they are specified sensibly, the installation is designed properly, the materials and equipment are installed properly, are user-friendly, the householder knows how to use them, and if they are given necessary maintenance. Building materials and building services are more sophisticated than they once were, but still need to be installed using traditional skills and techniques, and given the necessary inspection and maintenance. Our education service, secondary and further education needs to be able to equip its students for these tasks, basic numeracy as well as the technical and design skills. This should form part of the strategy - the 15-year programme can only be delivered by a workforce which has the necessary skills in design and installation, and if the need for inspection and maintenance is recognised and organised long-term.</p>	<p>The government has designed the Green Deal scheme to ensure that surveys and installations are carried out by properly accredited workforce.</p> <p>We will look to our delivery partners to provide training etc to local people and employment via apprenticeships.</p> <p>The Sustainable Procurement Policy ensures that there are opportunities for creating employment and training opportunities with the contractors that the council engages,.</p>
<p>Q3 comments</p> <p>A 15yr. programme, even a 10yr. programme is far too long and unrealistic in an essentially unstable political (at least 3 parliaments</p>	<p>There is a risk that a long programme may not be funded but this needs to be balanced against the need to deliver a programme that provides quality work.</p>

Appendix B– Responses to draft Delivering Warmer Homes (HECA) report

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<p>and local councils over next 15 years) and economic environment. These programmes have a very short political and financial life span, goal posts are constantly being changed. The HECA Report is to cover a 5 yr. period to 2018. Hence a 5 year, (7 yr. max) programme should be developed which is far more focussed and goes for the big wins and take advantage of scale. Focus solely on home insulation and data mapping. Ignore other devices - PV, Heat Pumps. It must be possible to "insulate" all properties within this time period.</p>	<p>The council will look to national government to continue to ensure that funding is available over this time frame</p>
<p>Q4. Do you consider that the proposed support for low-income families is about right?</p> <p>Yes = 1</p> <p>No = 0</p>	
<p>Q4 comments</p> <p>See comments above on change of definition for "fuel poverty". Pensioners who have paid off their mortgage might have lower housing costs but being pensioners on a pension also have a lower income - this is a robbing Peter to pay Paul argument. The feed-in tariff is funded by a levy on everyone's bills - so the beneficiaries who have solar pv installations (usually the affluent) are partly benefiting from the fuel-poor.</p> <p>The data that is provided is inadequate to determine the size/significance of this segment. The %s in Table 4.1 need quantifying - how many in each category / total and related to household total. In addition they should be related to SAP/EPC band.</p> <p>Re para 4.1 - 5th para - "Table 4.1 shows the distribution by ward - etc." does not relate to Table 4.1 as shown. In fact there appears to be no table showing distribution by ward of different homes.</p> <p>Appendix C - distribution of household types across the borough by</p>	<p>As above, proposed changes to the definition of fuel poverty will be decided by national government.</p> <p>We have specifically included references to installing solar pv to benefit people in fuel poverty as we recognise that this is a valid way of reducing electricity bills and also addresses the point made about how Feed-In Tariffs are funded (by a levy on all users)</p> <p>The revised draft has been altered to ensure that tables are correctly labelled</p> <p>The revised draft has been altered to ensure that tables are correctly labelled</p> <p>Appendix C has been removed following changes to the rest of the</p>

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<p>ward - unable to work out which columns make up 100% i.e. adding across the rows. Also what does All Household Reference Persons (HRP's) mean? How is this used in this paper?</p> <p>Overall it is not possible to confirm whether the proposed support is "about right". Paras 4.2 & 4.3 describe quantitatively what was done in 2011/12 but there are no metrics to assess outcomes / successes in each activity.</p> <p>How many people have been / would be lifted out of Fuel Poverty?</p> <p>Even just providing advice (para 4.2) maybe a waste of resources if there is a low take up/follow thru'. There are also no metrics to gauge how many have been reached by these various schemes in relation to total number who are have Fuel Poverty or the newer LIHC measure.</p> <p>Re para 4.3 - How was £75k spent in 2012/13? How many houses would be "insulated" in 2013/14 et seq. for £75k/yr.?</p> <p>Re para 4.4 - FIT - The economic attractiveness has been declining as FITs have been reduced considerably over recent years. With the limited resources (£/human), PV should not be included in this segment. There will be no scale economics to take advantage of in this segment which will be scattered across the borough in a variety of dwellings. too time consuming and resource intensive and maybe too sophisticated?</p>	<p>document</p> <p>Accepted. The Action Plan sets out our aspirations. To some extent we will only be able to demonstrate success once we have started to deliver</p> <p>At this stage this is an unknown</p> <p>Accepted. We will be looking to our delivery partner to devise a programme that is pro-active and which encourages take-up.</p> <p>We are currently in the delivery phase for this programme and will report these figures in due course.</p> <p>Although FIT have been reduced, it is not the case that solar pv is not financially viable. Installation costs have fallen significantly over the last year/eighteen months. Solar pv can be a useful installation in fuel poor households particularly where the resident can make use of the day-time energy produced.</p>
<p>Q5. Do you agree that the Green Deal represents an opportunity to deliver a step-change in improving the energy efficiency in the Borough and that Harrow should partner with a Green Deal Provider?</p> <p>Yes = 0</p> <p>No = 1</p>	
<p>Q5 comments</p> <p>The nature of Harrow's housing stock makes this a very difficult task -</p>	<p>Noted and agreed</p>

Appendix B– Responses to draft Delivering Warmer Homes (HECA) report

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<p>but it is worth conducting. Need to recognise that if houses are under-heated an improvement in insulation may result in improved comfort, but no change in energy-use or cost. As Harrow already have experience with a partner organisation, consider this form of conducting work can continue.</p> <p>in line with comments to Q3, prioritize and focus solely on Insulation measures and over a much shorter time period. Loft & cavity wall measures will give a payback within 5/7 yr. period. Challenge will be to understand and remove perceived barriers to uptake. Also leave boilers & DG alone - this is already fully commercialised, have much extended paybacks and are not as effective /£ as insulation measures.</p> <p>Simultaneously solid wall info. should be recorded / mapped in anticipation of suitable materials / application methods becoming available during the period or post 2018. Some pilots could be done during this period across all house types.</p>	<p>Accepted that loft and cavity wall insulation offers very quick paybacks but for this programme to be successful we need to make successful efforts in solid wall insulation as well.</p> <p>Boiler replacement and heating controls can also contribute significant savings and need to be included in the programme.</p> <p>The council accepts that take up of solid wall insulation is likely to be slow. However our ambition is to develop this area as quickly as possible because of the potential benefits in terms of energy saving and improved comfort for residents</p>
<p>Q.6 Do you think that our analysis of how to approach the different housing sectors is correct?</p> <ul style="list-style-type: none"> • Owner Occupied Yes = 1, No = 0 • Private rented sector Yes = 1, No = 0 • Council housing Yes = 1, No = 0 • Registered Providers Yes = 1, No = 0 	
<p>Q6 comments</p> <p>The hassle involved with building work is already preventing much improvement taking place in owner-occupied housing. The obvious time to make improvements in energy efficiency is when one occupant moves out and another moves in to the empty property - difficult to see how the Green Deal will operate in this situation - if the situation is to change the Green Deal will need to change to make it possible.</p>	<p>How the Green Deal will work is a cause for concern. What the strategy seeks to do is to set up an ECO-funded programme as well as a Green Deal programme. Take up on the Green Deal may well be lower initially than for an ECO programme.</p>

Appendix B– Responses to draft Delivering Warmer Homes (HECA) report

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<p>The timing of measures under the Green Deal for privately rented housing is not clear - the report mentions April 2018, April 2015 and the Energy Act 2011 (or, is this a reference to regulations which are to be issued under the Act?).</p>	<p>The council will try to use its position in the PRS to improve EPC ratings in this sector in a planned way to meet the 2018 target of a minimum E rating.</p>
<p>If local authorities are to be given the powers described, then Harrow should use them and require landlords to make the measures described.</p>	<p>The Government's stated aim is to introduce regulations with effect from 1 April 2018</p>
<p>The sentence in 6b.3 "tenants can request for energy efficiency measures to be inspected?" appears as a question. Does the tenant have this right?</p>	<p>A further report will be required when (and if) the government introduces further regulation.</p>
<p>Some of the guidance used by the Residential Property Tribunal appears most suspect - it is absurd to require improvements to heating as the only way of improving a cold property - they need to recognise the role of insulation, which will also keep the property in better condition - cold damp conditions affect the fabric as well as the occupants.</p>	<p>Tenant can request that their accommodation is assessed for excess cold, which may point towards energy efficiency measures. Text amended.</p>
<p>Surprised at the statement discriminating between hazard 1 (damp and mould growth) and 2 (excess cold) - the latter creates conditions that favour the former - and the 1875 Public Health Act addressed dampness in buildings - a long history of concern which should still be heeded now.</p>	<p>WE are trying to move towards treating cold homes holistically as part of this strategy. E.g. our Private sector housing enforcement section will provide best practice guidance to landlords, which will include the need to provide insulation. This would be identified in the EPC.</p>
<p>Note also that BS 5250 (Control of condensation in dwellings) has a useful section on investigating damp buildings which states that tenants will often be ashamed if they are unable to heat their home, and not give accurate answers - all guidance which the tribunal should be aware of and use.</p>	<p>There are 29 hazards in total. All hazards can be assessed as category 1 or 2 and the council has a statutory duty to take formal action where a category 1 hazard exists. Text has been reviewed to express the situation more clearly.</p>
	<p>But see above comments on EPC information and holistic consideration of homes</p>
	<p>The Private sector housing enforcement section will assess the causes of dampness when found. Where a defect is found, the landlord would be expected to resolve the problem. However, some dampness may be due to the behaviour of residents (e.g. insufficient ventilation). In these circumstances advice is offered.</p>
	<p>The introduction of EPCs helps the enforcement section to provide</p>

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	relevant advice etc to landlords
<p>Q6b Comments</p> <p>A EPC threshold of E is disappointingly low. Can LAs "insist" on a higher threshold?</p> <p>Last line of para 6b - (i.e. a SAP [not EPC] rating).</p> <p>Para 6b2 - 1st & 4th bullet points appear to be contradictory - "meet minimum standards", "no minimum standards".</p> <p>Box 2 - 2nd para - Excess cold appears to be both a Cat 1 & 2 hazard? later on excess cold is noted as a Cat 2 hazard?</p>	<p>The council will need to work within the legislative and regulatory framework so will be unable to insist on higher thresholds unless regulations allow this.</p> <p>Reference should be to the Energy Efficiency Rating – determined by an EPC inspection</p> <p>EPC records how energy efficient a property is and to measure its environmental impact. There are two ratings on the certificate. The first gives an energy efficiency rating from A to G, where A is very energy efficient and G is inefficient. The second rating is on the home's impact on carbon emission ratings.</p> <p>The Minimum standard refers to meeting the requirement of the EPC target of E by 2018. Whilst this target date is a few years away, we are already working through our Help2let agency to encourage landlords to bring their properties energy ratings to this minimum E rating where their property is currently below this standard</p> <p>See above comments on hazards and categories.</p>
<p>Q6d comments</p> <p>RPs to provide SAP/EPC data (which council will map) & programme for improvement over period to 2018.</p>	Registered Providers section has been fully revised
<p>Q6 comments</p> <p>Focus has to be on owner occupied making up 70% of the sector.</p>	Agreed that owner occupied property has to be a major part of the programme but the council needs a strategy for all sectors
<p>Q7 Do you agree with the draft Action Plan set out in Section 7?</p> <p>Yes = 1</p> <p>No = 1</p>	

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<p>Q7 comments</p> <p>The action plan contains too many actions and should relate specifically to achieving "Warmer Homes" and that which can be realistically achieved by 2018.</p> <p>#2 - how does this emission data contribute to "Warmer homes"?</p> <p>#5 - more relevant is by when a Green Deal partner is signed up.</p> <p>#6 - with declining FITs - is this financially viable? It is also resource consuming and relatively expensive to install. Is there good operating experience with low income families. Other measures maybe more viable/attractive. Also examine Solar thermal. Unless economics etc. can be clearly demonstrated, do not support.</p> <p>#7 - No - let someone else demonstrate viability etc.</p> <p>#8 - How does Zero Carbon Homes actually deliver "Warmer Homes"? - relates primarily to CO2 mitigation?</p> <p>#12, #13, #14 - EPC target of E is regrettably low; What can be done to to achieve a better rating.</p> <p>#15 - Do tenants understand an EPC? What can they do about it? Who will help them? They should see all these certificates, from a potential landlord BEFORE becoming tenants.</p> <p>#17 - This must be the major focus of resources as it affects 90% of all households.</p> <p>#23 - see #6. Consider Solar thermal when a new boiler is being installed.</p>	<p>The council has tried to follow DECC guidance in preparing the Action Plan</p> <p>This is in the DECC guidance. By tracking this data we can help to demonstrate the success of this strategy</p> <p>Agreed. We hope to appoint a partner early in April 2013.</p> <p>This has been revised slightly in the final version. We believe this is still relevant to low income families.</p> <p>Provide energy efficiency advice</p> <p>Heat pumps is a viable technology but we need a small programme to demonstrate this. The wording has been changed slightly to ensure that the council understands the financial options before making a firm commitment</p> <p>This is in the DECC guidance. It is relevant for new homes.</p> <p>The council needs to be careful that it does not exclude property from the market. Our aim is to use this as a minimum target and encourage landlords to improve their property.</p> <p>We aim to develop an information pack for residents that will help them understand this. We will also work with landlords to make sure they understand their legal responsibilities</p> <p>Agreed that owner occupied property has to be a major part of the programme but the council needs a strategy for all sectors</p> <p>Provide energy efficiency advice</p>

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<p>#24 - No; see #7</p> <p>#30 - see #6 but encourage Solar thermal when new boiler installed</p> <p>#31 - No; see #7</p> <p>Re Title relating to Action items 32,33,34. - what does "residential accommodation" refer to? Does this mean all households? Roll out of insulation measures should be along the lines of the Town gas to Natural Gas conversion programme.</p>	<p>Action has been amended to make it more investigatory</p> <p>Registered Providers section has been fully revised</p> <p>Registered Providers section has been fully revised</p> <p>Residential accommodation means all households..</p> <p>Legislation does not envisage a conversion programme as referred to.</p>