HECA Further Report
2013
Luton Borough Council
1. INTRODUCTION AND BACKGROUND

HECA requirements
This report is required as per the ‘Guidance to English Energy Conservation Authorities (ECA’s) pursuant to the Home Energy Conservation Act (HECA) 1995’ issued by the Department of Energy and Climate Change (DECC) in July 2012.

The process used to produce this report
This report is the culmination of a three stage process. Stage 1 involved the analysis of data and the production of Lower Super Output Area (LSOA)\(^1\) ward level maps for Luton to gain a better understanding of energy use and demographic factors which influence it. Stage 2 involved a review of relevant policies and plans and stage 3 brought stages 1 and 2 together in an officer level workshop to discuss findings and agree the future direction the Council should take with respect to HECA.

General profile
The background data analysed for this report shows that Luton has the following key characteristics relevant to future action under HECA:

- The district has a relatively low per capita domestic CO2 emissions rate of 1.9 tonnes per person. As household energy use is about average, the low CO2 figure could be due to Luton having a slightly higher number of people per household than the national average.

- Average domestic gas consumption fell by 19.9% between 2005 and 2010, while average domestic electricity consumption has only fallen by 9.2% in the same period.

- Data shows that take-up of cavity wall insulation measures has been below the national average. Take up has only recently increased in the closing stages of CERT.

- The district, relative to others nearby, has a rapidly rising population, but the proportion of the population over 65 is relatively small. The significant proportion of the population is also very transient. Household size is also higher than the national average.

- Levels of fuel poverty in the district rose to 16.9% in 2010, with the rate of increase being much greater than the national average.

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\(^1\) LSOAs are a geographic hierarchy designed to improve the reporting of statistics. They are consistent in population size, and typically contain a minimum population of 1000 and a mean population of 1500.
• The wards of Biscot, South, High Town and Dallow have a combination of large numbers of solid wall properties and households with low income.
Luton – energy, CO₂, insulation and fuel poverty in graphs

Domestic Energy Consumption in Luton in kWh

![Graph showing domestic energy consumption in Luton in kWh from 2005 to 2010.](image)

Domestic emissions for Luton in kt CO₂

![Graph showing domestic emissions for Luton in kt CO₂ from 2010 to 2013.](image)

Insulation per 10,000 properties in Luton

![Graph showing insulation per 10,000 properties in Luton from 2008/2012.](image)

Fuel Poverty in Luton

![Graph showing fuel poverty in Luton from 2006 to 2010.](image)

**Mapped data**

The data analysed for this report shows that Luton has the following key characteristics:

<table>
<thead>
<tr>
<th><strong>Solid Walls</strong></th>
<th>Solid wall properties are clustered in the centre of the borough. Wards with the highest concentrations are Biscot, Dallow, High Town and South. In these areas solid wall properties are over 50% of all dwellings.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Off gas network</strong></td>
<td>The Borough has a very small number of properties who may not use gas as primary source, but it is understood that this is down to choice rather than lack of accessibility.</td>
</tr>
<tr>
<td><strong>Electricity consumption</strong></td>
<td>Areas in the centre of the Borough tend to have the highest average electricity consumption.</td>
</tr>
<tr>
<td><strong>Economy 7 consumption</strong></td>
<td>Areas in the centre of the Borough tend to have the highest average electricity consumption.</td>
</tr>
<tr>
<td><strong>Gas consumption</strong></td>
<td>Average gas consumption is highest in central wards which would tend to indicate that properties using gas as the main heating fuel in these areas also tend to be poorly insulated. Barnfield, High Town, Icknield and Saints wards have the highest household gas consumption.</td>
</tr>
<tr>
<td><strong>Cavity Wall Insulation</strong></td>
<td>Areas with a relatively high proportion of cavity wall insulation installed since 2005 are clustered in Icknield, Lewsey Challney, Stopsley, Sundown Park, Farley and Wigmore. All these areas have relative low numbers of solid wall properties and are all very well connected to the gas network.</td>
</tr>
<tr>
<td><strong>Loft Insulation</strong></td>
<td>Areas with a high proportion of loft insulation installed since 2005 are clustered in wards to the north of the Borough. Farley, South, High Town, Wigmore, Stopsley, Round Green, Barnfield and Crawley wards all have very low levels of take-up for loft insulation in the last 7 years. Bramingham in the north also appears to have low loft insulation up-take.</td>
</tr>
<tr>
<td><strong>Condensing Boilers</strong></td>
<td>The highest concentration of condensing boiler installations since 2005 is found in Farley, Lewsey, Leagrave and Round Green. For an area with relatively good levels of gas network access, the levels of recent condensing boiler installations are low.</td>
</tr>
<tr>
<td><strong>PV installations</strong></td>
<td>Overall PV installations in the Borough are low and this simple analysis suggests only a marginal difference between areas of high vs low pv concentration. Lewsey, Leagrave and Challney wards stand out has having particularly low pv installation numbers.</td>
</tr>
<tr>
<td><strong>Index of Multiple Deprivation</strong></td>
<td>The IMD is an index created by analysing a range of factors that are symptomatic of social deprivation. The evidence from the...</td>
</tr>
</tbody>
</table>
The latest Index of Multiple Deprivation (IMD) published in 2007 by the CLG indicated that six of Luton’s 121 super output areas (SOAs) feature in the top 10% of the most deprived SOAs in England. Such areas are more likely than average to contain non-decent housing and much more likely to suffer from a poor quality environment. Overall, in the rank of average scores, Luton now ranks at 87th place out of the 354 local authorities in England. In 2004, Luton ranked at 101st place. Therefore, relative to the rest of England, Luton is more deprived now than it was in 2004. Within the East of England, Luton’s rank is the third highest (previously Luton had been in 5th place).

Using this analysis deprivation is highest in Farley, High Town, South, Round Green and Biscot in the south and Northwell, Lewsey and Leagrave in the north. As a rule deprivation appears to higher west of the main railway line.

<table>
<thead>
<tr>
<th>Benefits Summary map</th>
<th>South, High Town, Biscot and Leagrave have the highest proportion of benefits claimants.</th>
</tr>
</thead>
<tbody>
<tr>
<td>% fuel poor households</td>
<td>Fuel poverty in Luton in 2010 was 16.9%, which was higher than the national average. Almost all wards have levels of fuel poverty which affect over 11% of households. The following wards have significant areas where fuel poverty affects over 20% of households – Farley, South High Town, Biscot, Saints, Challney, Dallow, Stopsley and Icknield.</td>
</tr>
<tr>
<td>Band A Council Tax</td>
<td>The highest proportion of council tax band A properties are in High Town, South, Farley and Biscot with a sizable areas also in Round Green, Leagrave and Northwell wards This measure was selected as it serves as a proxy for low income households and therefore more likely to be susceptible to fuel poverty.</td>
</tr>
<tr>
<td>% Privately owned properties</td>
<td>Private home ownership is highest in wards to the east of the borough. These areas correspond to relatively high levels of take up for loft and cavity wall insulation but low levels of condensing boiler installation. E7 electricity use is also relatively high wards with a high proportion of home ownership.</td>
</tr>
<tr>
<td>% Privately rented properties</td>
<td>Private rental accommodation is clustered to the west of the borough (along with council and housing association properties) These wards correspond to the most energy inefficient properties and the most deprived households.</td>
</tr>
<tr>
<td>Council properties</td>
<td>The council housing stock is clustered in Lewsey, Leagrave, Sundon Park and Northwell in the north and Farley, South, High Town, Crawley, Round Green and Wigmore in the south. Almost all areas either match or border a CSCo designated area with the exception of two clusters in Icknield and Saints wards.</td>
</tr>
<tr>
<td>RSL properties</td>
<td>The bulk of housing association properties are clustered in High</td>
</tr>
</tbody>
</table>
Town, South, Biscot and Dallow with 4 other areas in Chaliney, Leagrave, Stopsley and Wigmore. Only the central cluster in High Town, South, Biscot and Dallow corresponds to a CSCo area while the social housing cluster in Leagrave boarders a CSCo area.

**ECO CSCo Areas**

The designated CSCo areas have a high correlation with housing association and council stock, most areas of fuel poverty and areas with a high concentration of band A households. The main CSCo cluster has a good amount of solid wall properties.

The maps below are a selection from those produced as part of the data analysis carried out to inform the ambitions and actions set out in this report.
2. LOCAL ENERGY EFFICIENCY AMBITIONS AND PRIORITIES

Key messages from the data analysis

Analysis of demographic, energy consumption and energy efficiency data shows that the Council will need to adopt the following approaches in order to reduce CO₂ emissions and tackle fuel poverty:

1. A renewed focus on basic insulation measures in all areas. The low take-up to date suggests considerable potential remains for loft and cavity wall insulation.

2. Solid wall insulation in the key wards of Dallow, South, High Town and Biscot. The concentration of solid wall properties in these wards lends itself to an area based approach.

3. Emphasis on tackling fuel poverty given the high levels already present and the relatively large number of poorly insulated properties. The wards of Dallow, South, High Town and Biscot should be the focus for attention.

4. To influence a reduction in domestic CO₂ emissions in a cost effective way, the focus will need to be on:
   a. Standard insulation measures as a priority.
   b. Improving the efficiency of gas boilers via upgrades to old boilers.
   c. Solid wall insulation measures and particularly to electrically heated properties.

5. Take up of renewables in the borough has been low. Future success here will depend upon the cost of new technologies and to some extent the attractiveness of incentives and the cost of alternatives. There may be potential for renewable heat technologies (heat pump / biomass boilers) in areas regarded as ‘able to pay’ with good carbon yield. Recent extra care sheltered development have included use of biomass heating fuel and an assessment of these will inform future use, both in existing suitable stock and in new development.

6. Any awareness raising or promotional programme should have as its focus the installation of hard measures as the best way to significantly reduce energy use over the long-term.

Local commitments and targets

COMMITMENTS

The Council has made the following public commitments with respect to reducing carbon emissions:
• Signatory to the Nottingham Declaration in 2006. Implementation of Climate Local is part of 2013-14 work programmes for the Strategy & Sustainability
• The Affordable Warmth Strategy makes the following commitment ‘Luton Borough Council believes that no household should have to spend more than 10% of disposable income on fuel to keep comfortably warm.’

TARGETS
Carbon emissions
The Council worked with the Energy Savings Trust (EST) to establish a Local Area Carbon Emissions Reductions Action Plan for Luton (2010) to reduce energy consumption and carbon emissions. The Plan has a target to reduce CO₂ emissions from domestic housing by 20% by 2015; this is based on per capita domestic emissions.

EST has now withdrawn support for the program due to reducing budgets and competing priorities but if LBC adopt a Climate Local approach it would replace the Local Area CER Action Plan.

Fuel Poverty
Tackling fuel poverty is a high priority for the Council. The Council has been awarded beacon status for its fuel poverty work. The Luton Affordable Warmth Strategy has the following key aims

• To raise the profile of energy awareness among Luton Borough Council staff and other organisations in the Borough.
• To ensure that energy awareness and advice reaches the most vulnerable members of the community.
• To implement the affordable warmth strategy within Luton Borough Council’s own housing stock.
• To encourage and assist affordable warmth programmes in private sector and housing association properties.
• To take advantage of the competitive fuel supply market on behalf of low-income consumers.

An objective to improve housing conditions has been set in the Luton Health and Wellbeing Strategy 2012-2017. This follows from findings in the Luton Joint Strategic Needs Assessment which found high numbers of non-decent homes and private renting in deprived wards were a contributory factor to increased health inequalities. The reason for homes being non-decent is a failure to meet required thermal comfort standards. The Health and Wellbeing Board is a partnership designed to ensure an integrated and co-ordinated approach across NHS, social care and public health services in Luton. The priorities outlined in the strategy will be the framework for future commissioning plans.
Renewables
There are no specific targets for renewables in Luton. The Council prefers an objective based on increasing local energy generation via implementing targeted schemes. The recently completed PV modelling study will be used by the Council in the future to guide its decisions in this area. The Council has promoted the use of renewables in the early phase of the Housing Joint Venture/ New Homes for Luton initiative and has achieved sustainability code 4 for this development partly through the use of pv. It is also developing four new bungalows within its own stock, also at code 4 in comparison to other current RP schemes which have slipped back to code 3 due to reduced grant.

Local activity
Fuel Poverty
The Luton Home Improvement Agency launched in 2010 is a development of the Council’s award-winning Affordable Warmth scheme, which began in 2001. The Affordable Warmth Scheme stems from the Affordable Warmth Strategy launched in 1998. The strategy aimed at identifying those at risk of fuel poverty and placing them in touch with organisations and schemes that could assist.

The Home Improvement Agency helps tackle fuel poverty by:

- helping people take advantage of free government grants to insulate their homes or make their heating systems more efficient
- developing and running discount schemes for householders who are not eligible for government grants
- communicating up to date information on energy efficiency offers to households
- organising talks on energy efficiency to groups of people
- training front line staff of all agencies within the scheme to spot potential problems linked to fuel poverty and to take appropriate action

The Affordable Warmth scheme is a multi-media referral portal aimed at providing holistic, robust services for vulnerable households especially those suffering from fuel poverty. The Scheme was awarded Beacon status for “Tackling fuel poverty” in 2003. Since 2001 the Scheme has helped over 5,000 households in the Borough of Luton. The Scheme has identified that fuel poverty is not being eradicated from the local area due to many factors. The biggest influence on the upward trend of people being placed into fuel poverty is the rise in fuel prices in recent times.

Luton was part of the Eon project of improving 100 homes in 100 days – which will provide invaluable research into the impact of improved thermal comfort.

There was one CESP\(^2\) initiative in the borough which involved the Council carrying out energy saving works to a number of hard to treat properties Orlit\(^3\) Units within the

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\(^2\) CESP: Community Energy Saving Programme was the predecessor to the Energy Company Obligation to deliver energy saving improvements in designated geographical areas.
Housing stock. A key practical lesson learned was to carry out external wall insulation work outside of winter months.

Regeneration
The Marsh Farm area of Luton is in the development and consultation phase of a major area regeneration project which is likely to see improved energy efficiency in tower block accommodation. Other major developments include refurbishment of the Cornish homes owned by the Council. These will receive external wall insulation, loft insulation and solar PV systems. The Council is also looking at options for energy works to other non traditional properties using the ECO scheme.

Renewables
The Council has modelled PV installations on its own stock, however due to the change in the FiTs rates only a limited number of installations took place although a resumption of the scheme is under review using direct investment. The modelling remains valid and can be used to inform future installations. Other more cost effective energy saving measures are still required within the publicly owned stock such as boiler replacement and insulation measures and the Council will evaluate appropriate levels of spend across all measures. PV has been used by partner providers where possible and further pressure will be applied to RP partners to use renewable sources of energy in new development schemes but funding issues may dictate responses.

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3 Orlit Units are classed as non-traditional construction types being built from pre-fabricated reinforced concrete.
4 Cornish Units are non-traditional house type built from pre-fabricated reinforced concrete, normally with a mansard roof.
3. MEASURES TO DELIVER SIGNIFICANT ENERGY EFFICIENCY IMPROVEMENTS IN RESIDENTIAL ACCOMMODATION

Key messages from the data analysis

- There remains significant potential to improve energy efficiency through basic insulation and heating measures. Links with health inequalities and deprivation suggest the emphasis should be on Private sector stock.
- There is scope to integrate improvements in the Council’s own stock with the availability of ECO Carbon Saving Community funds in the CSCO area and surrounding neighbourhoods.
- The Council will be looking to the ECO Home Heating Cost Reduction Obligation as a source of funds to reduce heating costs and carbon emissions in the private sector and especially the private rented sector.

The nationally available financial incentives

**Green Deal**

Luton Borough council is committed to exploring the benefits of the Green Deal initiative. The Council’s ambition is to create a local model mutually beneficial for residents and the local economy. The Council’s Building & Technical Services dept. is also looking to explore greater engagement in the process, with potential growth in ECO brokerage.

The underlying rationale is that the Council wishes to have a strategic role and in so doing will ensure that local residents are able to take advantage of a credible and trusted Green Deal offer. Additionally the prospects of linking up the deployment of energy measures with economic development and training and employment opportunities, together with all of the social and health benefits are key factors behind the Council’s approach to the Green Deal.

In addition to the above, the Council intends to take the following steps to facilitate the Green Deal:

- The Council will raise awareness via the following means:
  - Support to community groups and community-led initiatives.
  - Provide information, resources and a means to network.
  - Make the most of any resources / learning as a result of the Pioneer Places programme\(^5\)

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\(^5\) A nationwide pilot programme to trial Green Deal providers prior to the official launch of the Green Deal
- Ensure staff are properly informed / trained about the Green Deal.
- The Council acknowledges its consumer confidence/protection role and will consider how this can be best achieved through its Trading Standards service.

**Energy Company Obligation**

- Carbon Saving Communities Obligation (CSCO). Luton contains 7 Carbon Saving Community areas as designated under the Energy Company Obligation. It is the Council’s desire to secure CSCO funds to support the cost of eligible measures being installed as part of improvement work to Council properties in these and adjacent areas. Data analysis has shown that the designated CSCO areas have a high correlation with housing association and council stock and most areas of high energy use, low take up of insulation measures and high incidence of fuel poverty. The main CSCO cluster also has a good degree of correlation with off gas and solid wall properties.

Given the high levels of deprivation in regeneration and CSCO areas, regeneration plans will be linked to fuel poverty and energy saving objectives, and the Council will further investigate the specific energy efficiency input into regeneration schemes as well as any specific low carbon / fuel poverty considerations.

- Home Heating Cost Reduction Obligation (HHCRO) Fuel poverty in Luton Borough is significantly worse than the national average and the council has a long-standing programme to tackle it. Fuel poverty is high, but not exclusively confined to CSCO areas where there are a large proportion of solid wall. As this obligation covers private tenure households on qualifying benefits, the Council will be working with partners to promote these funds to the relevant households. Key areas where this obligation will be relevant are high fuel poverty or relatively deprived wards of Farley, South, High Town, Biscot, Saints, Chaliney, Dallow, Stopsley, Icknield, Round Green, Northwell, Lewsey and Leagrave

- Carbon Emissions Reduction Obligation (CERO) This is the subsidy element designed to enable some expensive measures such as solid wall insulation to be viable under the Green Deal. This is targeted at the able-to-pay group; as such the Council and its Green Deal partners will work to ensure that for areas where this subsidy element is relevant, residents are made aware of opportunities to use the Green Deal and Eco. The council will look to work with a Green Deal provider to focus attention on high energy use and low insulation take up areas identified in the Borough; these include Farley, South, High Town, Wigmore, Stopsley, Round Green, Barnfield and Crawley wards.

**Affordable Warmth funding** The Council and its partners will continue to collectively and individually seek funds to support affordable warmth work. Key sources of funds will be the Department of Health and energy utilities.
Renewable energy tariffs and premiums
Take-up of FiTs and RHI will primarily be down to individual households to access. The Council will look to encourage take-up of the RHI where its installation could complement Green Deal insulation works. The Council will also be assessing how RHI funds can be utilised for schemes to install sustainable fuel boilers Council housing.
Local Policies, Initiatives and Resources

Local Policies
Policies and actions relating to energy efficiency and fuel poverty occur in many of the Council’s strategies and those of partnerships the Council is involved with. A key task for the Council and partners is to ensure all those policies and actions relating to HECA ‘point in the same direction’.

Council Corporate Level

Luton Borough Council Corporate Plan 2011 – 2014
Affordable warmth and reducing CO₂ emissions are explicitly mentioned under the following Key Strategic Priorities:

1: Empower, support and protect the vulnerable
- Continue to develop preventative and early intervention services e.g. affordable warmth

6: Protect and enhance the quality of the natural and built environment
- Action on climate change. Carbon Trust programme to reduce CO₂ emissions on Council’s own estate by 11% by 2014
- Luton Housing Strategy 2012 – 2015 (to be enforced on renewal to give greater consideration to energy efficiency across all tenures)

The council met the decent homes standard for its stock by the due date (2012) and will continue to invest in stock maintenance to ensure its homes remain at this standard or higher. The Council has fitted photo voltaic panels to a number of council houses and flats.

Registered providers – the majority of the stock owned by housing associations has been built within the last 20 years and most is in good condition requiring little planned maintenance. Each provider has an asset management plan and invests in their stock to maintain standards. Where possible Luton Borough Council will use its Strategic Housing Authority role to ensure appropriate housing stock standards are achieved.

Luton Private Sector Renewal strategy 2010 - 2013

Energy Efficiency
The Council previously achieved beacon status for its affordable warmth programme and has seen investment in the Housing Assistance program rise in respect of targeting energy efficiency (Cosy Homes Grants and Healthy Heating Assistance) and it is expected that this area will continue to grow as fuel prices rise.

Actions
- In the rented sector the Council is to continue to tackle properties exhibiting excess cold using its Statutory Powers.
A programme of energy awareness sessions for residents is being delivered in cooperation with Adult Community Learning, Community Development and the Luton’s Home Improvement Agency. The training programme is aimed at front line officers and community leaders and is delivered by the HIA Co-ordinator on a yearly basis.

Planning
Luton Borough Council Local Plan 2011 – 2031
The draft local plan for Luton is currently under development. In it there are 4 policies which have an impact on future domestic carbon emissions in the borough. They are:

Policy U3 - Carbon reduction and sustainable energy in new buildings
Will require new developments to be designed and constructed according to the “Energy Hierarchy” (reduce energy demand through passive design and efficiency measures; supply energy efficiency through decentralised energy generation; generate energy from low and zero carbon sources on site) and to ensure that they are well-equipped to meet and potentially exceed the carbon reduction requirements of the Building Regulations Part L.

Policy U4 - Code for Sustainable Homes and BREEAM
Will require developments to be assessed in terms of the Code for Sustainable Homes and BREEAM to secure commitments to CO2 reduction in line with the proposed trajectory of the Building Regulations.

Policy U5 – Community Energy Grants
Sets out Luton’s approach to the potential use of funds paid under the ‘Allowable Solutions’ element of the zero carbon requirement for new dwellings through the Building Regulations Part L in 2016.

Policy U6 – Decentralised Energy
This policy sets out the two main roles for the Council in realising additional decentralised energy capacity in Luton. These are
- Strategic role – identifying sites, neighbourhoods and urban areas that are suitable for decentralised energy networks based on heat density and consistency of heat demand amongst other factors.
- Implementing role – ensuring that new development in a “decentralised energy opportunity area” connects to an existing local decentralised energy network or is equipped to connect up to any planned heat network.

Regeneration
Marsh Farm is located on the northern outskirts of Luton. The estate was primarily local authority built between the late 1960’s and the mid eighties, comprising approximately 4,000 dwellings and a population of 9,000. Approximately half of the dwellings are currently in private ownership.

Community facilities within Marsh Farm include schools, a neighbourhood centre, a recreation/leisure centre, health centre and a new community enterprise and
resource centre located at Futures House. The neighbourhood shopping centre, the Purley Centre which is in the centre of Marsh Farm, includes local shops, market area, library and residential units is outdated and requires considerable investment. The shops are enclosed within a mall and do not attract trade.

Marsh Farm is characterised by severe problems of multiple deprivation, including unemployment, poverty, and lack of skills, poor educational achievement, and poor health. In recognition of the multi-faceted nature and severity of problems, Marsh Farm was designated a New Deal for Communities (NDC) neighbourhood in 2000. Funding totalling £48 million was awarded to support the comprehensive regeneration of the estate.

A master plan was prepared for the estate, the key objectives being to establish a development and delivery plan to create a strong urban village centre that will meet the aspirations of the community, Council and other service providers and the proposals stemming from this are now being worked up to design stage involving local residents, councillors and traders. It is envisaged that redevelopment of the central area will commence in 2014 with new retail provision with new residential units following. The proposals include consideration of efficient district heating scheme as an alternative to individual boilers and the new homes will be built to code 4 with PV utilised wherever possible.
Within the Marsh Farm Action Area (identified as such on the Proposals Map) the council will grant planning permission for:

(A) developments in the Central Area (identified as such on the Proposals Map) which comprise:
- (i) retail, community, recreational, employment or educational facilities which meet the needs of local residents; and
- (ii) the provision of residential units which complement the proposed function and character of the area; and
- (iii) infrastructure provision which allows the area to function efficiently and effectively as a local centre; and
- (iv) open space provision which complements and enhances its role as a local centre; and
- (v) the loss of buildings, or the relocation of uses, which inhibit the proposed function and character of the area; and

(B) developments in the Residential Area (identified as such on the Proposals Map) which comprise:
- (i) the provision of residential units which complement the proposed function and character of the area; and
- (ii) commercial, recreational, educational and community uses which complement the function and character of the area; and
- (iii) infrastructure provision which allows the area to function efficiently and effectively; and
- (iv) open space provision of sufficient quantity and quality to enable the area to function efficiently and effectively.

Affordable Warmth Strategy
The strategy defines and sets out a comprehensive range of actions to be implemented by the Council and partners to tackle fuel poverty in the borough. The strategy is under refresh at the moment as it is over ten years old. This will be coordinated by the HIA Co-ordinator and the new strategy will be heavily badged to energy solutions and capture our work around the Green Deal/ ECO, collective energy buying scheme, as well as our local approach to tackling fuel poverty and its instigators.

Our HECA report will provide the platform for the new Affordable Warmth Strategy and this will also draw on the framework of other local strategies such as the Climate Change and Public Sector Housing Renewal strategy.

Private Sector Housing Renewal Strategy
The Private Sector Housing Renewal strategy (PSHRS) is currently under refresh and will reflect the Affordable Warmth/ Green strategy currently being developed. The
PSHRS outlines the ambition of the Council in terms of Decent Homes Assistance, Landlord Accreditation Scheme, Housing Condition survey, Disability Facility Grants (DFGs) as well as home and thermal comfort improvement, service provision and customer satisfaction.

Local Initiatives to improve energy efficiency

Housing refurbishment
The Council has refurbishment works ongoing in the key wards of Biscot, Dallow, High Town and South. A major component of these works is energy efficiency improvements to council stock.
The Council’s Private Sector Housing department has also promoted a holistic approach to housing refurbishment, with schemes like Decent Homes Assistance, which targets the MSOAs in the Borough and provides a home improvement loan to meet the Decent Homes Standard for qualifying households. The works covered under the program range from basic insulation to structural work to the property.

Planning
The council has carried out an assessment of community / decentralised energy including mapping and the formulation of new policies.

Home Insulation
The Council has had a lengthy and successful programme to encourage homeowners to install cavity wall and loft insulation utilising Carbon Emission Reduction Target (CERT) funding. The council has also used CERT funding to install loft and cavity wall insulation (where suitable) in its social housing stock.

Affordable Warmth
The Home Improvement Agency helps tackle fuel poverty by:

- helping people take advantage of free government grants to insulate their homes or make their heating systems more efficient
- developing and running discount schemes for householders who are not eligible for government grants
- communicating up to date information on energy efficiency offers to households
- organising talks on energy efficiency to groups of people
- train front line staff of all agencies within the scheme to spot potential problems linked to fuel poverty and to take appropriate action

Other Local Initiatives
- Luton Home Improvement Agency – partnership service specialising in helping older and vulnerable people to take advantage of services they might not be otherwise aware of including energy efficiency improvements
- Aerial Thermal Imaging - Roof insulation assessment tool for the public to identify the amount of heat loss from the roof of their property.
• Energy Monitor Lending Service - Residents with a standard library membership card can now borrow the monitors that show the amount of electricity being used at home, as well as what it costs the householder per hour. The energy monitors are available, free of charge on a three week loan from the Central Library and all branch libraries.

• The Council has three high energy efficiency show homes in Park Town built in partnership with the BRE.

• ‘Ready to Switch’ scheme – Collective energy buying scheme working in collaboration with 12 other local authorities to bulk buy better energy deals for local residents.

Local Resources to improve energy efficiency
The Council and local housing providers have a range of resources with which to improve energy efficiency and tackle fuel poverty as set out below. It is likely however that the Council will target these resources towards those unable to pay for improvements in line with its focus on fuel poverty.

Council Housing Stock

• LBC took advantage of the CESP initiative by carrying out energy saving works to a number of hard to treat properties within the Housing stock. Lesson learnt is where EWI is concerned; carry this work out outside of winter.

• Other major developments include for Refurbishment of the Cornish homes owned by the Council. They are soon to receive, EWI, loft insulation and Solar PV’s. The Council is at the initial stages of looking at options for energy works to other non traditional properties under the ECO scheme.

• LBC is investigating engaging with an ECO broker to transform the towns under performing stock through the installation of energy efficiency measures, with an aim of reducing household’s energy bills.

Housing Renewal funds

Decent Homes Assistance
The system of providing owner occupiers with interest free loans to bring homes up to the decent homes standard has been in place for five years. The scheme is targeted at the Medium Super Output Areas (MSOAs) and wherever practical and cost effective incorporates energy efficiency measures.

Equity Release
The Council has partnered with the Consumer Credit Counselling Service (CCCS) to deliver an equity release scheme for qualifying homeowners to
enable clients to undertake a range of work including energy efficiency and heating improvement works.

The Council will continue to provide capital assistance to tackle fuel poverty under the Renewal Policy and will continue to explore opportunities for external funding to enhance the Council’s funding provision.

**Community Infrastructure Levy**

The Council will explore how it can utilise the new Community Infrastructure Levy to provide finance for retro-fit insulation schemes and other energy efficiency schemes in the borough.

**Housing Association Funds**

Housing Associations will be sought to integrate their energy efficiency activity with that of the Council’s in CSCO areas. In most cases this activity is funded from planned maintenance budgets. It is also likely Housing Associations will where possible access ECO CSCO funds in conjunction with works in CSCO areas.

**Health Funding**

The Council and partners will continue to seek Department of Health funds where possible. Local public health funds could also be deployed where there was a proven link between energy efficiency works and mortality / morbidity.

**Other Funding**

Community and voluntary partner organisations involved in energy efficiency and fuel poverty work have limited funds, but can also access charitable funds such as from Luton Airport and Vauxhall.

**Advice, Education and Promotion**

Alongside advice and promotion specific to the Green Deal mentioned above, the Council will also:

- Continue to update the advice provided in publications, website and social media and to work with our partners to ensure such advice is consistent. The Council’s online aerial thermal imaging maps of the borough will be an important resource for local residents. The Survey was done back in 2007.
- Through the Luton Home Improvement Agency network continue to provide training and advice to front line staff.
- Maintain clear signposting to, or provision of energy efficiency advice to householders.
- Maintain and build Luton’ strong affordable warmth brand image.
- Utilise Luton Borough’s 800 community champions and excellent track record in tenant engagement.
- The Council aims to update private sector landlords through the Landlords’ Forum in respect of the Green Deal and opportunities for landlords and...
tenants. The Council is keen to engage landlords in the key CSCO/regeneration areas.

- Engage registered providers and other agencies through Luton housing Partnership

4. MEASURES PROPOSED TO DELIVER ENERGY EFFICIENCY IMPROVEMENTS IN A COST EFFECTIVE MANNER.

Key messages from the data analysis

Analysis of key data suggests that there are relevant schemes in the district to attract ECO / Green Deal finance. The Council will aim to establish a working partnership with an accredited ECO provider to target appropriate assistance to eligible residents in the area. Targeting of ECO funding will be developed following further analysis of more detailed data. Previous experience in Luton has shown that targeted marketing has had an impact on the take-up of insulation measures. For any scheme which comes forward the Council will ensure that:

- Links are made to the Council’s regeneration programme and especially so in CSCO areas.
- where possible any areas based initiative(s) covers all tenures,
- planning policy issues relating to conservation area status and its impact on insulation works in target areas is addressed, prior to schemes commencing,
- the idea of having demonstration properties is explored, and
- it investigates the potential to revise policies and criteria for spending of council funds to ensure maximum benefit is gained from Green Deal / ECO and Council funds.

Loft and Cavity Wall Insulation

The recent up-take of insulation in the borough is lower than the national average. Although the data does not show potential uninsulated cavities and lofts, the low rates combined with the approximate 60,000 cavity wall properties in the borough suggest that up to half these properties remain uninsulated.

Solid Wall Insulation

The large number of solid wall properties which are uninsulated (internally or externally) make this measure one of the most important in the suite of available measures which will yield significant carbon savings. There are large health inequalities in wards with large numbers of solid wall properties and there is a
recognised link between the thermal efficiency of houses in these areas and deprivation and poor health.

**Targeted fuel poverty actions**
Fuel poverty in Luton is particularly concentrated in central and southern wards with areas of high deprivation, large numbers of solid wall and a prevalence of private and social stock housing.
Area based and other initiatives to be explored by the Council

Given the large number of CSCO designated areas in Luton, the council has decided to focus on these areas with respect to any areas based approach

Scheme 1 - Carbon Saving Community Obligation (CSCO) Areas

Luton Borough contains 7 Carbon Saving Communities areas as designated under the Energy Company Obligation. The Council (and most likely housing associations) will be seeking funding from this source for area based programme most likely focused on solid wall insulation where this is viable. Although most of the housing stock in CSCO area is either Council or housing association, it is envisaged any scheme will be across all tenures. The designated CSCO areas have a high correlation with housing association and council stock and fuel poverty. The main CSCO cluster also has a good degree of correlation with off gas and solid wall properties.

The table below shows key information on each of the CSCO areas.

<table>
<thead>
<tr>
<th>CSCO Area / Ward</th>
<th>Key Characteristics</th>
</tr>
</thead>
<tbody>
<tr>
<td>High Town</td>
<td>High proportion of private rent and RSL properties, high IMD score, large numbers of solid wall properties. Low up-take of insulation.</td>
</tr>
<tr>
<td>South</td>
<td>Mixed tenure, high fuel poverty and IMD scores, large number of solid wall properties, high proportion of benefits claimants in the north of ward.</td>
</tr>
<tr>
<td>Dallow</td>
<td>Mixed tenure with high proportion of private rental properties. Large number of solid wall properties in the east of the ward.</td>
</tr>
<tr>
<td>Biscot</td>
<td>Mixed tenure tending towards low levels of private ownership, large numbers of solid wall properties, high IMD and fuel poverty scores.</td>
</tr>
</tbody>
</table>

Scheme 2 – Home Heating Cost Reduction Obligation (HHCRO)

There also appears to be a high proportion of hard to treat properties in high fuel poverty areas which do not fall under the CSCO designation. In many cases these areas are adjacent to CSCO areas in which case they will form part of negotiations with ECO providers. In other cases, and in line with the Council’s efforts to tackle fuel poverty, the Council aims to investigate how it can, through a targeted street by street approach get residents on eligible benefits to utilise the HHCRO. As this obligation covers private tenure households on qualifying benefits, the Council will be working with partners to promote these funds and where possible to identify households. Key areas where this obligation will be relevant are the high fuel poverty or relatively deprived wards of Farley, South, High Town, Biscot, Saints, Challney, Dallow, Stopsley, Icknield, Round Green, Northwell, Lewsey and Leagrave.
A Street by street approach will be more appropriate in this case where it will be possible to locate high concentrations of the right properties with occupants in receipt of benefits enabling them to access HHERO funds.

Other potential or ongoing initiatives
Below is a list of other initiatives the Council is keen to explore over the next two years.

- Community loan scheme for a thermal imaging camera, used to help people understand how energy inefficient their homes are and what the remedies might be.
- Community heating opportunity in Regeneration projects in the Borough,
- Through the ‘New Homes for Luton’ programme, The Council and other joint venture partners\(^6\) have identified a number of housing development sites. The Council will encourage other Joint Venture partners to further investigate the potential for CHP/district heating, micro-scale or community-scale renewables, and greater building fabric improvement and emissions reduction.

\(^6\) New Homes for Luton is being delivered as a joint venture between the council, LLCP, Catalyst Housing Group and Wates Living Space
5. TIME FRAME FOR DELIVERY AND NATIONAL AND LOCAL PARTNERS

HECA strategy delivery plan
The summary table below sets out an indicative timescale for the delivery of actions in this plan. Responsibility for delivering this plan rests with the Council, although various schemes will be delivered via partnerships as described below.

Local partners
The Council will be forming / maintaining the following local partnerships to further its HECA ambitions:

- Affordable Warmth Fuel Poverty Partners
- Luton Health and Wellbeing Board
- The local Home Improvement Agency to help target area based initiatives and provides fuel poverty services.
- All Housing associations to tackle hard to treat properties
- A local installer network including the Council’s Building Technical Services to be the primary vehicle for installing measures / schemes proposed in this report.
- A local network of Green Deal assessors.
- Community and local residents groups / associations and especially those involved in community planning in the designated regeneration / CSCO areas.
- Local parish Councils, community / voluntary organisations to help publicise and raise the profile of schemes proposed in this report.

Regional partners
The Council intends to work with Central Bedfordshire and Bedford Borough Councils to realise efficiencies especially in-terms of developing an ethical approach to Green Deal referrals.

The Council will explore pathways for development through its regional statistical partners and garner their approach for dwelling improvement and energy efficiency in housing stock.

National partners
Luton Borough Council will create alliances with energy utilities and brokers to secure ECO (Fuel Poverty Obligation and Carbon Saving Obligation) funds for the benefit of local residents.
The Council will be working with delivery partners (developers / infrastructure companies). These organisations will be responsible for the main regeneration improvement works including relevant heating and insulation improvements.