

---

# Home Energy Conservation Act 2021 Report

Note: All questions have a 4000-character limit (Approx. 500 words).

---

## Introductory Questions

***Name of Local Authority***

Bury Council

***Type of Local Authority***

Unitary Authority

***Name, job title and email address of official submitting report***

Michelle Stott  
Interim Unit Manager – Adaptations and Energy  
[m.d.stott@bury.gov.uk](mailto:m.d.stott@bury.gov.uk)

---

## Headline and Overview

***Does your Local Authority have a current strategy on carbon reduction and / or energy efficiency for domestic or non-domestic properties?***

***If yes, please provide a link***

Greater Manchester wide strategies:

**5 Year Environment Plan**

In this, Greater Manchester sets an ambition to be carbon neutral by 2038. Reducing the amount of energy used in Greater Manchester's existing buildings will be key to achieving this aim, especially given 95% of Greater Manchester's existing buildings are still likely to be in use by 2050.

<https://www.greatermanchester-ca.gov.uk/what-we-do/environment/five-year-environment-plan/>

### **Report on Decarbonising Our Existing Buildings**

This report builds on the priorities and actions on buildings in the Five-Year Environment Plan. It sets out where Greater Manchester is now and where it needs to get to in terms of the energy demand of its existing domestic, commercial and public buildings. Based on that, it provides a set of recommendations for taking action that are being taken forward by the Greater Manchester Combined Authority (GMCA) and its partners.

<https://www.greatermanchester-ca.gov.uk/what-we-do/environment/homes-workplaces-and-public-buildings/domestic-and-non-domestic-energy-efficiency/>

### **The Global Covenant of Mayors for Climate and Energy**

The Global Covenant of Mayors for Climate and Energy requires Greater Manchester to set targets aligned with or exceeding an 80% emissions reduction by 2050, and to achieve a 40% reduction between 2005 and 2030. (Greater Manchester has delivered c26% between 1990 and 2013). The commitment also requires comprehensive action planning, monitoring and reporting using their specific methodologies.

<https://www.globalcovenantofmayors.org/>

### **Bury 2030 Strategy**

Bury 2030 is an aspiring plan for the future of the Bury, it includes an ambition to improve energy efficiency and reduce carbon emissions, working towards everyone living in a high-quality carbon-neutral environment by 2038.

### ***If no, are you planning to develop one***

Yes, Bury has a draft Climate Change Strategy, with an aim to publish by August 2021. Additionally, the Council has a Draft Housing Strategy that has been informed by our Housing Needs and Demand Assessment and through consultation with a wide range of stakeholders including private developers and registered providers operating in the borough. An outcome of this will be rapid movement towards low carbon housing. Our housing targets are 100% net zero-carbon new homes by 2028 and 100% carbon neutral homes by 2038. This is aligned with the Bury 2030 Strategy and the draft Climate Change Strategy.

### ***What scheme(s) is your Local Authority planning to implement in support of energy saving / carbon reduction in residential accommodation properties in the next two years?***

#### **Green Homes Grant Local Authority Delivery (GHG)**

The scheme aims to:

- Tackle fuel poverty by increasing low-income homes' energy efficiency rating while reducing their energy bills.

- Deliver cost effective carbon savings to carbon budgets and progress towards the UK's target for net zero by 2050.
- Support clean growth and ensure homes are thermally comfortable, efficient, and well adapted to climate change.
- Support economic resilience and a green recovery in response to the economic impacts of Covid-19, creating thousands of jobs.

The scheme provides money towards energy efficient measures, such as:

- External wall insulation
- Air Source Heat Pumps
- Underfloor insulation
- Room in roof insulation
- Window replacements
- Door replacements
- Smart heating controls
- Solar PV

### **GM Retrofit Accelerator (subject to procurement) (RA)**

The Retrofit Accelerator, which is in the developmental stage at present, will look to:

- Engage with those customers (residents and landlords) who make up 31% of households identified as willing to pay for retrofit Greater Manchester.
- Cover all housing archetypes and tenures across all 10 districts.
- Facilitate an unbiased home assessment to inform the customer as to what measures can be done, in what order, to achieve the best results or, if a pick and mix approach is taken to installing the measures, offers a pathway of least future regret.
- Explain to the customer the associated costs and benefits of the measures.
- Create a bespoke offer to the customer covering finance options, levels of quality assurance, warranties, and delivery options.
- Subject to the route taken by the customer, engage the supply chain and manage the installation of the measures and secure sign off, once the work complete.
- Become a self-financing entity, where customers are offered attractive packages that meet their needs, at this point the estimated market size in GM over the next 5 years is £5.4bn.

### **Department for Business, Energy and Industrial Strategy (BEIS) Testing Toolkit Pilot**

In 2019/20 seven pilot studies across eight English local authorities were delivered which investigated enforcement of the Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015. Following this a draft toolkit was developed by Centre Sustainable Energy (CSE) with BEIS support, drawing on findings with example materials developed to assist Local Authorities. In 2020 Bury was one of 12 Local Authorities chosen, (and awarded £100,000 from BEIS) to test this toolkit. The COVID Pandemic caused delays in

the delivery of this project, however this funding and the guidance in the toolkit has enabled Bury to successfully create a Civil Penalty Policy for the enforcement of the minimum energy efficiency standards (MEES) and has identified properties that potentially, (subject to further investigation) fail to meet the minimum standard. Therefore, Bury Council will also be actively promoting MEES and will be undertaking targeted enforcement action where required.

### **Six Town Housing**

The Council's ALMO Six Town Housing (STH) will be installing External Wall Insulation on Hard-to-Treat properties and installing measures to reduce carbon emissions of homes including solar PV with batteries on social housing stock.

***What has been, or will be, the cost(s) of running and administering the scheme(s), such as the value of grants and other support made available, plus any other costs incurred (such as administration) as desired.***

#### **GHG:**

- GMCA has secured £10.3 million of funding to run the Green Homes Grant Local Authority Delivery scheme in Greater Manchester. All improvement works are to be completed by 30 June 2021 for GHG LAD Phase 1a and 30 September 2021 for GHG Phase 1b.
- Up to 15% has been allocated to support programme admin, legal, procurement, marketing, and wider installation ancillary costs.
- For owner-occupiers, the grant will cover 100% of the cost of the improvements up to a maximum government contribution of £10,000.
- For landlords, the grant will cover two-thirds of the cost of eligible improvements, up to a maximum government contribution of £5,000.

#### **RA:**

- The initial costs are anticipated to be circa £250k with input from the procured partner(s) on top.

***What businesses, charities, third sector organisations or other stakeholders do you work with to deliver the scheme(s)?***

#### **GHG:**

This scheme works in conjunction with all 10 Greater Manchester local authorities in partnership with our delivery agent E.ON, who utilise a supply chain of local installers.

Delivery of the scheme also includes several Social Housing providers from across the region.

Both elements are supported by the Growth Company to ensure gaps in supply chains are supported, while providing a route for local suppliers to be engaged.

***What has been, or will be, the outcome of the scheme(s)? These outcomes could include energy savings, carbon savings, economic impacts such as job creation and / or increased business competitiveness or societal impacts such as alleviation of fuel poverty and / or improved health outcomes etc.***

**GHG:**

The scheme aims to raise the energy efficiency of low-income and low EPC rated homes (those with Band D, E, F or G) including those living in the worst quality off-gas grid homes, delivering progress towards reducing fuel poverty, the phasing out the installation of high carbon fossil fuel heating and the UK's commitment to net zero by 2050.

Additionally, the scheme will seek to support local suppliers and jobs while providing wider economic impact.

**RA:**

Potential outcomes include and are not limited to:

- Creation of a local market for domestic retrofit with national significance
  - Opportunity to support local supply chains, apprenticeships, and employment initiatives through deployment at scale
  - Ability to leverage private sector investment
  - Increase in disposable income for residents
  - Increased levels of comfort and wellbeing with reduced levels of fuel poverty
  - Ability to design and sell a suite of retrofit products and services into national markets
  - Utilisation of existing networks for potential suppliers / consortia members
- 

## **Communications**

***Does your Local Authority provide any advisory services to customers on how to save energy?***

Bury Council directs residents to national and local advisory organisations. Six Town Housing has a dedicated energy post to provide energy advice to tenant. Additionally, has trained staff in City and Guilds energy awareness and fuel debt to assist in giving fuel poverty and energy efficiency advice.

**If yes, please briefly outline how this is undertaken**

Advice delivered through home visits, telephone, community events, website through referrals or part of capital scheme

***How do you communicate or encourage energy saving amongst domestic consumers and / or local businesses?***

Through the Council's website. Six Town Housing has information on website, leaflets are provided, digital training provided. Also communicate in person and via telephone contact.

---

## **Local Green Supply Chain**

***Have you made any assessment, or undertaken any analysis of the existing capacity in your local energy efficiency retrofit supply chain to support the decarbonisation of buildings by 2050? If Yes, please summarise the outcomes.***

We have, via the region's Growth Company, conducted mapping of the retrofit supply chain across Greater Manchester, by installation measure and size. This in turn has been individualised for a number of the 10 Greater Manchester districts across the Green Tech sector.

***What actions are you taking, if any, to upskill and / or grow the local energy efficiency installer supply chain? This could include the facilitation of training, and local installer networking opportunities.***

We are embarking on a project, Retrofit Accelerator, which is aimed at growing the local energy market. See above for further information.

***What actions are you taking, if any, to promote energy efficiency and the installer supply chain to consumers, and encourage households to consider energy retrofit?***

We use social media, press and targeted mail to promote energy efficiency, which is supported by the following campaigns:

For the GHG scheme, we have conducted mailouts to residents, to promote energy efficiency, this has been effective and resulted in substantial uptake of the scheme.

Through the Retrofit Accelerator, the GMCA is aiming to develop a pipeline to promote energy efficiency and encourage householders to retrofit.

***If no action is taking place in either of these two areas, please let us know of any barriers you have encountered.***

Not applicable.

***How effectively is your LA able to engage (Trustmark / PAS2035 / PAS2030 certified) installers?***

We are working in partnership with E.ON, the Growth Hub and with our registered social providers to engage certified installers. This has not been without its challenges. However, by providing myth busting advice (Growth Hub), access to contracts and steadily increasing delivery we have been successful to date.

***Do you have any plans to develop policies or initiatives in this space over the next five years as part of supporting your local decarbonisation efforts?***

We are in the process of developing a new initiative, Retrofit Accelerator, see above.

---

## **Social Housing**

***What action, if any, has your LA taken to install energy efficiency or low carbon heat measures in social housing? Have these been installed to a satisfactory quality? What actions (if any) have your social housing partners taken?***

The GMCA is supporting the regions social housing providers, with technical support and different funding programmes including:

GHG: The programme is currently supporting 9 social landlords to upgrade 697 social rented homes. These are all being installed in accordance with the PAS2030 / 2035.

ERDF: The region through our ERDF intermediary body status is funding 2 projects Homes as Energy Systems and Southway Housing's Arrow field Park to deliver measures across social rented homes. These measures include EWI, Solar PV, ASHPs, GSHPs smart controls and battery storage.

***Do you have easy access to the information / knowledge within your organisation that you would expect to need for social housing retrofit projects? (e.g. stock condition; property data; approach to procurement; alignment with existing internal maintenance / upgrade plans; tenant engagement and management plans; costings)***

Stock condition and property data: Pathways to Healthy Net Zero Housing for Greater Manchester report by Parity Projects utilised a housing stock data baseline for each of the 1.2 million homes in Greater Manchester, including social housing stock, to model the range of pathways to Net Zero in housing by 2038. This is supplemented by an in-depth look at housing health and safety risks, and dynamic modelling of six archetype homes.

The modelled data contains 40 variables, including information on:

- The property - property type, age, tenure, flat rise and floor, building area
- Building fabric - window type and glazing, wall type, roof type and insulation
- Heating system - main / secondary heating and fuel types and SAP rating
- Hot water tank
- Solar PV
- SAP, EPC and EI certificates
- Fuel use, bills and carbon produced

This project has also produced a dataset modelling the likelihood of homes containing a Category 1 HHSRS hazard.

The dataset and the queries that have been built with it, will help to identify the scale of retrofit required and support the development of business cases, to unlock investment opportunities and identify areas and type of properties for different types of intervention.

**If no, would it be easy / difficult to obtain this information?**

Not applicable

***Have you experienced any challenges to retrofit, including during any previous government schemes you have taken part in (e.g. supply chain, funding, tenant cooperation, mixed tenure, split incentive, policy clarity, etc)? Please provide some detail. Have social housing partners reported any challenges to retrofit?***

The principal barriers to delivery of retrofit across the social housing sector in GM remain:

- Financing / cost recovery
- Planning
- Law of diminishing returns
- Impacts on fuel poverty

Social housing providers must invest in their properties to meet many different requirements including electrical and gas safety, fire risk, 'decency', disability related adaptations. Installation costs of low carbon 'retrofit' measures at scale within asset management plans could potentially compromise the delivery of regulated investment priorities. Budgets are not sufficient to enable these measures to be deployed in meaningful quantities. Without additional financial support, retrofit remains a 'nice to have' investment rather than an essential one. Where no additional capital funding support is provided, mechanisms to recover additional investment from tenants should be made more widely available. Given regulations around the calculation of social and affordable rent etc, it is not within the gift of landlords to amend rent structures to go some way towards recovering increased capital investment which, primarily, benefits the tenant.

Installation of EWI and ASHP heating systems can be constrained by local planning. In non-conservation areas, the 'warm tones' of existing brickwork can be deemed more important than the carbon emissions reduction and warmer



tenants. Planning can be required where landlords are installing multiple ASHP units on a single building (e.g., low rise flats). This can add time and cost and many authorities have noise level restrictions which even the quietest ASHP unit can contravene.

Social landlords could be seen as victims of their own success in relation to the average energy performance of their stock. With regular, cyclical investment in their buildings, windows tend to be the higher performing double-glazed units, re-roofing programmes mean lofts are insulated to current building regulations levels, cavity walls have been insulated, light fittings in kitchens and bathrooms are LED and all gas appliances are 'A' rated. There are of course numbers of solid fuel, solid wall and conservation area properties but, in the main, the cost-effective fabric measures have been installed. Further energy demand reduction works become less 'cost effective' given the smaller amounts of carbon savings they deliver and the argument for investment, when viewed alongside other competing priorities, becomes harder to support.

Following delivery of cost-effective fabric interventions, low carbon heating remains an option and it has been recognised in the Parity dataset outlined above that fossil fuel heating has no place within a net zero housing portfolio. As a result of the way environmental levies are applied to electricity bills as opposed to gas bills means electricity, the fuel that continues to de-carbonise at pace, is a more expensive fuel on a per kWh basis. The switch from a fossil fuel heating system to a lower carbon electrified heating system can result in an increase in fuel bills for tenants. Exacerbated further due to lack of understanding on operation of low carbon and heat pump heating systems. Social landlords do not want to invest in these sorts of heating system if they risk pushing tenants into fuel poverty.

***How does your LA currently/how will your LA in future plan to go about identifying suitable housing stock and measures for retrofit? How do social housing partners identify suitable stock? By the same measures or via a different method?***

The Parity dataset outlined above and the queries that have been built with it will enable the GM LAs to identify housing stock / areas for potential retrofit measures. The report also contains a number of potential pathways to net zero housing, modelling the impact of combinations of fabric interventions, fossil gas upgrades, rollout of heat pumps and photovoltaics on GM's housing stock. It is planned that this data will be shared with the GM Housing Providers so that they can use it to help identify suitable stock, alongside their own data and asset management information.

***What considerations would make you more or less likely to apply for government funding? If known, what is the opinion of your social housing partners?***

A move away from targeting specifically E, F and G rated properties would increase the number of dwellings social landlords could include within domestic retrofit projects and increase the attractiveness of future funding streams.

Recent funding programmes have had incredibly short delivery timescales. These timescales have dissuaded social landlords from applying for or participating in funding bids. The focus on what represents a very small proportion of landlords' stock (E, F and G rated properties, and to a lesser extent, even D rated homes) exacerbates the perception of the effort to procure and deliver a scheme outweighing the 'benefit'.

Recognising again that the majority of cost-effective fabric interventions have already been delivered, low carbon generation (namely solar PV) coupled with low carbon heating represents a very real investment opportunity that delivers a cost-effective route to net zero housing. Allowing solar PV without restriction of number of systems but with a caveat of a low carbon heating system being installed at the same time (or with a binding commitment to install one within a set timeframe) would help overcome concerns around increasing tenants bills from switching to electrified heating systems whilst also reducing carbon emissions.

***To what extent are social housing tenants willing or unwilling to undergo retrofit, and what are the barriers and facilitators to their participation? If known, is this the same opinion across all social housing tenants or is it different with HA and ALMO tenants?***

Lack of tenant participation in retrofit schemes can be attributed to three primary reasons:

- Disruption
- Perception
- Choice

Disruption affects participation in many different kinds of investment programme and is not just an issue for retrofit schemes. Tenants may simply not want to live through works which can be messy impact on their daily lives and require 'strangers' in their home. Retrofit schemes, can be more disruptive than most – specifically fabric improvement programmes like EWI, IWI and UFI. Low carbon heating systems require thermal storage (hot water cylinder) and although most properties once had an airing cupboard, these have now been repurposed into practical storage or room layouts have been altered to completely remove the cylinder cupboard. The prospect of losing the cupboard or floor space for a cylinder can dissuade tenant participation.

When faced with the prospect of disruption, tenant perception of the benefit can impact on willingness to participate i.e. is the intervention worth the disruption. Double glazing remains a popular retrofit measure despite relatively modest energy bill savings. New kitchens and bathrooms equally are valued whereas IWI or an ASHP heating systems are less so. The view that a combi-boiler heating system is the 'best option', with certain brands being named as desirable, is a well-supported view. Equally, due to understanding of technologies involved, it can be incorrectly assumed that a low carbon heating system e.g. a ASHP with an output of 8kW is a lesser solution compared with the

24kW combi currently installed. None of these points are unique to the social housing tenants (ALMO or RP) and reflect views held across all tenures.

Many landlords give a choice to tenants e.g. an ASHP or a combi boiler. Building on the point above, the lack of knowledge about or perception of a solution coupled with a choice being given means familiarity and a certain level of understanding drives inertia, frustrating change. This is not to say tenants should not be given a choice, it must simply be recognised that giving choice without informing and supporting people in the decision making process is likely to result in 'refusal' of retrofit solutions that require tenants to change behaviours or learn how to operate / maintain something new and, at first glance, complex. The lack of understating and visibility of certain retrofit measures e.g. heat pumps, is not something that can be tackled by landlords individually and needs to be supported by a national awareness raising campaign or similar.

***Does the approach to retrofit change for leaseholders in mixed tenure blocks? What encourages them to co-operate?***

It is very much dependent on the measure.

Certain retrofit solutions such as shared loop GSHP can be designed and installed without the need for the leaseholder to participate. If they choose not to, they can remain on their current electric heating system or, where a gas system has been removed, landlords can provide the most cost effective solution that meets the terms of the lease if the leaseholder is not prepared to contribute towards the GSHP solution.

Insulation schemes on flats are relatively straightforward as it is not practical or viable to not insulate a single leaseholder flat mid-way up a tower block. Low rise homes are a little more complex and leaseholder participation (or lack of) has, in relation to EWI schemes, created 'rotten teeth' within a row of terraces.

The primary challenge to leaseholder participation in retrofit schemes is financial. If the property is well maintained to a standard that the retrofit intervention can be applied without remedial or enabling works (which is often not the case due to underinvestment in a property by the owner occupier) there remains significant capital outlay to fund the installation of the retrofit measure itself running into thousands of pounds. Contractors working on social housing investment programmes are encouraged to offer works to leaseholders or owner occupiers in the areas they are working, but many social housing focused contractors are not prepared to take on the financial risk associated with working on 'private' properties – their business models are predicated on working for a single, social housing or public sector client, and not being reliant on securing myriad small sums from owner occupiers or leaseholders. Low cost / 0% public sector loan (equity loan) or grant payable to the installation contractor by the public sector on behalf of the leaseholder covering the cost of works would facilitate participation.

---

# **Domestic Private Rented Sector (PRS) Minimum Energy Efficiency Standards**

***Is your authority aware of the PRS Minimum Efficiency Standards regulations requiring private rentals in England and Wales to meet a minimum energy performance rating of EPC Band E as of April 2020, unless a valid exemption applies?***

Yes

***Which team within your authority is responsible for, leading on enforcement of the PRS minimum standard? Please provide the contact details of the person leading this team.***

Adaptations and Energy Team, Michelle Stott, 0161 253 6367,  
[m.d.stott@bury.gov.uk](mailto:m.d.stott@bury.gov.uk)

***What method or methods does your authority use to communicate with landlords and tenants about the standards and other related issues?***

Planned activity include promotion on the Council Website, Press Release, Direct targeted mailout and potential for follow up door knocking – (Subject to Covid restrictions).

What barriers, if any, does your local authority face enforcing these regulations (e.g. identifying non-compliant properties / landlords, budgeting / resourcing, any legal issues)?

Officers are unable to access Council Tax data under the Energy Act for the purposes of MEES enforcement.

Bury has only been able to scope the potential for MEES enforcement due to the BEIS testing toolkit enforcement pilot study funding (£100K). This enabled the recruitment of a dedicated officer, the creation of a civil penalty policy to enable enforcement and initial identification of possible non-compliant properties. The Covid Pandemic caused delays in the delivery of this pilot however the Council is hopeful that enforcement may be possible this financial year, following the approval for the carryover of unspent funds, enabling the recruitment of a dedicated officer fixed term until 31/03/22. Without a dedicated officer it would not be possible to take proactive targeted enforcement and ensure effective improvements in property standards.

***Do you directly target landlords of EPC F and G rated properties to enforce these regulations? If yes, how? If no, please explain.***

Bury has identified clusters of F and G rated EPC properties utilising bulk download data from Landmark. Land registry searches are then undertaken to ascertain ownership. Bury is planning to write to potential landlords to advise of the regulations, promote the GHG LADS for domestic retrofit and encourage

engagement with the Council.

---

## **Financial Support for Energy Efficiency**

Where possible, please set out your answers to the following questions by tenure (owner occupied, privately rented, or social housing).

***What financial programmes, if any, do you have to promote domestic energy efficiency or energy saving? If applicable please outline the budget (and % of the budget that is used), where such funding is sourced and where it is targeted.***

Owner occupied / Private Rented Sector / Social Housing:

We have the Green Homes Grant Local Authority Delivery Scheme project, please see above, the total budget for this project is currently £10.3M.

***What future investment for energy efficiency or low carbon heat measures do you have planned, and when are these investments planned for?***

STH plans to utilise capital funding for the installation of EWI and solar PV with batteries in 2021-22.

---

## **Fuel Poverty**

***Does your Local Authority have a Fuel Poverty Strategy?***

No – planning to update a fuel poverty action plan for Bury once staffing capacity resolved.

***What steps have you taken to identify residents / properties in fuel poverty? What blockers, if any, have there been in identifying households in fuel poverty?***

In previous projects, we have utilised index of multiple deprivation data to target appropriate households for energy efficiency measures. We have sometimes found this data to be inaccurate and for there to be pockets of deprivation in affluent areas etc.

***How does fuel poverty interlink with your local authority's overall Carbon Reduction Strategy?***

By improving the energy efficiency of homes in Greater Manchester, householders should see a decrease in their utility bills; this may assist in the alleviation of fuel poverty for some GM residents.

***Please highlight any fuel poverty issues specific to your area.***

In Greater Manchester following years of projects tackling fuel poverty, we are now finding that those properties remaining untreated are often properties that are difficult to treat, i.e. require costly measures or specific expertise e.g. thumbnail cavity, solid wall insulation.

***What measures or initiatives have you taken to promote fuel cost reduction for those in fuel poverty? Include information on partnerships with local businesses or energy providers you have.***

Through the GHG project, in conjunction with E.ON, see above for details and measures, we have promoted energy efficiency works on fuel poor houses, which will see a reduction in householder fuel bills.

---

## **Green Homes Grant Local Authority Delivery**

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

***Has your Local Authority Participated in GHG: LAD?***

**If yes, please indicate which phase you participated in and briefly outline the project. o If no, please indicate what barriers prevented you from participation in the scheme.**

GMCA is currently participating in phase 1A and 1B of GHG: LAD and is in the process of contracting c£17m for phase 2.

Under phase 1a, we are intending to target 630 measures to a total of 517 properties.

Under phase 1b, we are intending to target 821 measures to a total of 821 properties.

The overall breakdown of measures anticipated to be installed includes:

- Solid wall insulation = 499
- ASHP = 205
- Underfloor insulation = 23
- Room in roof insulation = 23
- Window replacements = 23
- Door replacements = 45
- Smart heating controls = 45
- Solar PV = 577

- Cavity Wall Insulation = 11

GMCA is in the process of contracting an additional c£17M of GHG to expand our existing GHG programme from £10.3M to c£27M, extending delivery timescales from September to December 2021.

***Would your Local Authority be in a position to manage the delivery of upgrades through a scheme such as LAD in 2022?***

**If yes, please indicate the anticipated number of homes that could be upgraded per year. o If no, please indicate what barriers would prevent you from delivering upgrades in your area.**

Yes we have systems already in place, a delivery agent, tools to identify suitable properties / residents. Based on our current abilities / achievements from the GHG LAD scheme we could confidently upgrade around 5,000 properties in Greater Manchester in 2022.

---

## **The Energy Company Obligation (ECO)**

The Energy Company Obligation (ECO) is an obligation on energy suppliers aimed at helping households cut their energy bills and reduce carbon emissions by installing energy saving measures. Following the Spring 2018 consultation, the Government set out in its response that ECO3 will fully focus on Affordable Warmth – low income, vulnerable and fuel poor households.

The ECO “Local Authority flexible eligibility” (LA Flex) programme allows LAs to make declarations determining that certain households in fuel poverty or with occupants on low incomes and vulnerable to the effects of cold homes, are referred to ECO obligated suppliers for support under the Affordable Warmth element of ECO.

LAs involved in the LA Flex programme are required to issue a Statement of Intent that they are going to identify households as eligible, and the criteria they are going to use; and a declaration that the LA has been consulted on the installation of measures in a home.

***Has your local authority published a Statement of Intent (SoI) for ECO flexibility eligibility? (Y/N)***

In Greater Manchester, it was agreed by all 10 LAs to produce one Statement of Intent for all 10 LAs and declarations of eligibility will only be issued for Greater Manchester-wide or Local Authority-led schemes via the affordable warmth service operating in each district. The statement can be viewed via this link:

<https://www.greatermanchester-ca.gov.uk/what-we-do/environment/homes-workplaces-and-public-buildings/domestic-and-non-domestic-energy-efficiency/>

***Please answer the following questions to help us to understand LA Flex delivery in more detail:***

**How many declarations were issued for low income vulnerable households?**

93

**How many declarations were issued for Fuel Poor households?**

2

**How many declarations were issued for in-fill?**

0

**What is the highest income cap published in your SoI?**

£26,800 for 2 or more adults with 4 or more children in a household.

**If you have used an income over £30k gross, what reason have you given?**

To be eligible, a household must be low income, and have high-cost energy costs (LIHC).

High energy costs (HC) can be evidenced in one of two ways:

i) Having an Energy Performance Certificate (EPC) of band E, F or G; or ii) If the household has no EPC, or it is inaccurate, then an LA or its affordable warmth service may score the responses to the set of questions provided in Table 2 of Annex 6 of the BEIS ECO3 Flexible Eligibility Guidance. A score of 40 or above would confirm the household as High Cost (HC).

Alternatively an eligible applicant would need to be identified as low income and vulnerability to cold (LIVC). To be eligible through this route, a household must have an income lower than the relevant threshold AND contain one of the following:

- A person with a mental or physical health condition caused or exacerbated by living in a cold home;
- A person with a disability;
- A person who is over 70 years of age;
- A person who is under five years of age;
- A person who is pregnant;
- A person who is terminally ill;
- A person with a suppressed immune systems (e.g. from cancer treatment or HIV);
- A person who moves in and out of homelessness;
- A person with addictions;
- A person who has attended hospital due to a fall;
- A recent immigrant, asylum seeker or refugee (if living in private tenure).



***Do you charge for declarations to be signed? If so, please state how much?***

No.

---

## **Smart Metering**

***Please provide a brief statement outlining your current or planned approach to promote smart meter take up and supporting residents to achieve benefits.***

***Please provide further information on activities relating to smart metering, including but not limited to:***

- a. Integrating approaches to delivering energy efficiency improvements in residential accommodation
- b. Arranging for smart meters to be installed by energy suppliers in vacant social housing premises
- c. Using social landlords to promote smart meter uptake
- d. Including smart meters in landlord licencing schemes
- e. Supporting residents who have had appliances condemned for safety reasons
- f. Other supporting activities

Not applicable

---

## **Future Schemes and Wider Incentives**

***Please outline any further schemes or wider initiatives not covered above that your local authority has carried out or is planning to undertake to improve energy efficiency in residential accommodation.***

Not applicable