



Chartered  
Institute of  
Environmental  
Health

# The UK Fuel Poverty Strategy 2001: Consultation on Amending Reference to the Warm Front Scheme Eligibility Criteria

Response to Department of Energy and Climate Change  
consultation

February 2011

# The Chartered Institute of Environmental Health

As a **professional body**, we set standards and accredit courses and qualifications for the education of our professional members and other environmental health practitioners.

As a **knowledge centre**, we provide information, evidence and policy advice to local and national government, environmental and public health practitioners, industry and other stakeholders. We publish books and magazines; run educational events and commission research.

As an **awarding body**, we provide qualifications, events, and trainer and candidate support materials on topics relevant to health, wellbeing and safety to develop workplace skills and best practice in volunteers, employees, business managers and business owners.

As a **campaigning organisation**, we work to push environmental health further up the public agenda and to promote improvements in environmental and public health policy.

We are a **registered charity** with over 10,500 members across England, Wales and Northern Ireland.

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## Response to questions

1. Do you agree with the proposals to amend the eligibility criteria? If you consider there to be weaknesses in the outlined approach please suggest how we could mitigate. Please provide evidence with your answer.

1.1 The CIEH does not agree with the proposals, but acknowledges that in the context of the current budget reductions, few options were available. However, narrowing the target focus to the 'poorest' houses in the 'lower' energy efficiency dwellings is an inefficient use of the available resources. Fuel poverty is more sensitive to fuel prices than to the SAP rating of a property. If the housing stock becomes 5% more energy efficient but prices go up 9% and incomes remain flat or fall back against inflation, those in fuel poverty grow in number and can afford less fuel. Household income is also a significant factor and is not keeping pace with fuel prices; rather it is falling back.

1.2 There appears little evidence about what types of properties remain in the lower SAP group, both in terms of construction (e.g. solid walls) and tenure – it is well known that private rented sector houses are the poorest for energy efficiency. This affects the maximum or reasonably achievable SAP rating, the measures which can be installed and their payback time. They also accommodate households who can be both mobile and/or low income and disengaged from the concept of improving their temporary home for lower fuel bills.

1.3 We believe that the proposed replacement Green New Deal is not sufficiently more attractive for tenants or landlords and the final phases of Warm Front may be more effectively targeted at that group rather than owner occupiers for whom the Green New Deal will be more attractive

1.4 We are concerned that all of the proposals rely on a SAP rating for eligibility. It is the experience of our members working in local authorities that the bureaucracy necessary to arrange inspectors to visit everyone who applies to identify homes with a SAP rating below any proposed limit will take a high proportion of the funds allocated, which again seems a waste of the available resources. We are not aware of any feasibility study to assess the true costs of administering such a scheme; a simpler way of producing a SAP rating should be introduced.

1.5 We are also of the view that SAP ratings will introduce another level of complexity and there is currently too much inconsistency in SAP ratings between assessors.

2. Do you agree that we should apply a maximum thermal efficiency level to households applying for Warm Front?

2.1 The biggest problem remains that there is no clear minimum enforceable SAP rating for property or the mechanism to apply it. It remains legal to occupy or let a home which is below the minimum standard.

3. Do you agree the revised wording to the UK Fuel Poverty Strategy appropriately reflects the Government's intention to better target Warm Front measures? If not please propose an alternative.

3.1 We would support the introduction under Warm Front of the ability to install renewable energy systems such as heat pumps and/or photovoltaic cells, rather than continuing with boiler replacement. A large scheme of this nature could significantly benefit the "renewable" market in the UK. For example, the feed in tariffs on PV cells could offset fuel bills on "hard to treat" houses – thus introducing more renewable energy as well as tackling fuel poverty.

3.2 Many local housing authorities are unable to access 'energy performance certificates' in respect of rented accommodation. Such data can facilitate better targeting and enforcement of minimum standards.

3.3 The CIEH would propose that national eligibility criteria are established but that local housing authorities administer the scheme and disburse the funding, using local solutions to meet local circumstances.