

Making domestic energy efficiency a Government priority (England)

Parliamentary briefing · July 2020



Chartered Institute of Environmental Health (CIEH)

CIEH is the professional voice for environmental health representing almost 7,000 members working in the public, private and non-profit sectors. Building on its rich heritage, CIEH ensures the highest standards of professional competence in its members, in the belief that through environmental health action people's health can be improved.

Environmental health has an important and unique contribution to make to improving public health and reducing health inequalities. CIEH campaigns to ensure that government policy addresses the needs of communities and business in achieving and maintaining improvements to our environment and our health.

CIEH is a member of the End Fuel Poverty Coalition.

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The context

Improving energy efficiency of all types and tenures of housing has the unique advantage of tackling several important priorities at once:

- Improving health and wellbeing
- Reducing NHS costs
- Reducing fuel poverty and energy bills
- Reducing carbon emissions from domestic sources
- Contributing towards reaching net zero by 2050
- Improving housing conditions

Despite having relatively mild winters, recent research shows that the UK has the sixth highest long-term rate of excess winter mortality out of 30 European countries.¹ There are around 35,900 excess winter deaths in England and Wales² every year and cold homes are directly responsible for around a third of these deaths.³ More than 2.5 million or 11% of people in England are living in fuel poverty.⁴ Homes also account for 20% of greenhouse gas emissions in the UK.⁵ By speeding up energy efficiency measures in our homes right now, the Government could help to reduce unnecessary NHS costs, fuel poverty and make greater progress towards the 2050 carbon net zero target.

Around one million homes are languishing in the two lowest energy efficiency bands – F and G.⁶ Homes that are in these two bands are by definition excessively cold – they are very likely to have a category 1 hazard under the Housing Health and Safety Rating System⁷ – and therefore would impact on the health of occupiers. Cold homes make up a significant proportion of the costs to the NHS and to society as a result of poor quality housing.⁸

The Building Research Establishment has estimated that there are around 1.3 million category 1 hazards due to excess cold, which contribute around £848 million per annum of costs to the NHS.⁹ After falls in the home, excess cold is the most common type of hazard found by environmental health practitioners working to improve conditions in the private rented sector (PRS).^{10,11}

Funding to improve energy efficiency in all types of housing

Recent reports from both the Committee on Fuel Poverty¹² and the Business Energy and Industrial Strategy Select Committee¹³ have highlighted large gaps in funding required to meet the challenge of fuel poverty and energy efficiency. Energy Company Obligation investment is worth £640 million per year.¹⁴ This is currently one of the main funding streams for improving domestic energy efficiency and alleviating fuel poverty.

In the Queen's Speech 2019, the Government outlined its plan of *'lowering energy bills by investing £9.2 billion in the energy efficiency of homes, schools and hospitals'*.¹⁵ This funding is more important than ever during the current COVID-19 crisis, as it should help to stimulate the economy and create new jobs, as well as making headway towards a green recovery. This week, the Chancellor announced funding of £3bn for energy efficiency programmes. This is a welcome step but is only one third of the earmarked sum. The funding programme needs to be long-term and come with a dedicated strategy to ensure that the money is effectively spent.

The Government ambition is to *'upgrade as many [homes] as possible to Energy Performance Certificate (EPC) Band C by 2035 where practical, cost-effective and affordable'*.¹⁶ However, without a specific number of homes to be upgraded, it is impossible to hold the Government to account on this promise as the definition of affordable or practical is not clearly defined.

We would like to see:

- A long-term programme of investment focussed on improving energy efficiency and improvement of building fabric, focussing on the fuel poor and those with health conditions in the first instance
- A clear strategy to bring all existing housing up to Band C by 2035 with plans and trajectories on how to tackle housing in all the tenures
- Government targets on how many homes will be upgraded by 2025, 2030 and 2035
- Support and incentives for homeowners to speed up investment in energy efficiency from those who can afford to upgrade their homes

Minimum standards in the private rented sector

35% of fuel poor households live in the PRS, which is proportionately higher than the percentage of PRS homes across England (20%).¹⁷ In particular, fuel poor households occupy 58% of the privately rented Band F and G homes, and on average would need over £1,000 per annum reduction in their fuel bill in order not to be classed as fuel poor.¹⁸ According to data in the latest English Housing Survey, there are 255,000 homes in Bands F and G in the PRS.¹⁹

Minimum Energy Efficiency Standards (MEES) were made into law in 2015 and amended in 2018. From 1 April 2020, these regulations apply to all PRS properties, but the standard is set very low at Band E level. There is also a cost cap of £3,500 for landlords.²⁰ This cost cap means that around 50% of properties are likely to remain in EPC Bands F and G – the lowest two bands.²¹

Whilst there have been calls that the new standards have not been enforced by local authorities, there is actually a

lot of interest in this area from our members. We believe that there are several reasons for lack of enforcement to date, including:

- The minimum standard is currently set too low – at Band E, it is still possible that a property might be excessively cold, according to HHSRS, which is easier to action under Housing Act 2004 legislation
- Local areas do not have a register of all rented properties in their areas, which makes enforcement difficult. Properties without an EPC do not appear on the EPC register
- From 1 April 2020, the MEES will apply to all properties so should in theory be easier to enforce. Previously the standard only applied to new tenancies, which are harder to track
- An EPC is valid for up to 10 years, meaning that some EPCs are very out of date

Houses in Multiple Occupation (HMOs) are usually defined as accommodation which is being shared by five or more people from at least two separate households. While some HMOs house tenants who know each other, others house a set of unrelated tenants chosen by the landlord. HMOs are excluded from the new minimum standards, despite housing some of the most vulnerable groups in the PRS.

We would like to see:

- The MEES to be raised to at least Band D by 2025 or sooner to increase the level of ambition for properties in the PRS and to give local authorities a greater incentive to enforce these minimum standards
- HMOs to be given the same or higher minimum standards for energy efficiency, as the rest of the PRS
- A national registration scheme introduced for England to help local authorities to identify privately rented homes and enforce minimum energy efficiency standards

What action can you take?

We strongly believe that improving the energy efficiency of housing across the country will have positive impacts on our health and our environment. As such, we are very keen that the issues and proposals highlighted in this briefing are raised with the Government.

We would be delighted if you might consider tabling some written questions pressing the Government on these key issues. We would of course be very happy to draft any material for your consideration, so please let us know.

Is there support for this?

CIEH is a key organisation in the End Fuel Poverty Coalition and many of our policy proposals are shared by our partner organisations. Full membership of the End Fuel Poverty Coalition can be viewed here: <http://www.endfuelpoverty.org.uk/>

References

- 1 [Cold homes and excess winter deaths: a preventable public health epidemic that can no longer be tolerated](#), NEA and E3G, Feb 2018.
- 2 Excess winter mortality in England and Wales, ONS. Figure is a three year average from 2016/17 (34,300), 2017/18 (50,100) and 2018/19 (23,200).
- 3 p.88, [Environmental burden of disease associated with inadequate housing](#): A method guide to the quantification of health effects of selected housing risks in the WHO European Region. World Health Organization, 2011.
- 4 [Annual Fuel Poverty Statistics in England \(2017 data\)](#), ONS, 2019.
- 5 The Future Homes Standard consultation, MHCLG, October 2019.
- 6 Data extracted from English housing survey – 2018/19, ONS, published 2019. (Actual figure: 1,038,000 from AT2.7.)
- 7 The Health costs of cold dwellings, BRE for CIEH, 2011.
- 8 The full cost of poor housing, BRE, 2016.
- 9 [The cost of poor housing to the NHS briefing paper](#), Building Research Establishment, 2011.
- 10 Local housing authority action on conditions in rented housing, Report following a FOI request to local housing authorities prepared for Karen Buck MP, Stephen Battersby, January 2018.
- 11 Table DA4101 (SST4.1): [Health and safety - dwellings](#), 2017. English Housing Survey, 2019.
- 12 Interim Report, Committee on Fuel Poverty, October 2019.
- 13 [Energy efficiency: building towards net zero](#), BEIS Committee, July 2019.
- 14 [Housing Insulation debate](#), House of Lords, 25 February 2020.
- 15 P.116, [Queen's Speech](#), December 2019.
- 16 Consultation on Fuel Poverty Strategy for England, BEIS, September 2019.
- 17 Interim Report, Committee on Fuel Poverty, October 2019.
- 18 Interim Report, Committee on Fuel Poverty, October 2019.
- 19 Housing stock tables (AT2.1), English Housing Survey headline report 2018-19, MHCLG, Jan 2020. (5.3% of 4,805,000 dwellings is 254,665.)
- 20 Domestic private rented property: minimum energy efficiency standard – landlord guidance, BEIS, Oct 2017.
- 21 [MEES Impact assessment](#) (6.3), BEIS, 2018.