

**East Midlands Regional Assembly Response to:
Home Energy Conservation Act (HECA) Consultation**

General Comments

1. Overall the East Midlands Regional Assembly supports the proposed Repeal of HECA but would like to stress the importance of ensuring that the expertise and partnerships produced so far is maintained. The new Energy Saving Trust (EST) Sustainable Energy Networks may be a useful vehicle for this. The Housing Intelligence in the East Midlands (Hi4em) database has also provided a useful means of monitoring progress on Energy Efficiency in homes. It is important therefore that this kind of evidence base is continued. In addition the need to continually improve existing housing stock as a local objective should be embedded within mechanisms such as the Local Area Agreement.

Response to specific questions *(as highlighted in the consultation paper)*

What is your experience of the success of HECA in meeting its objectives?

2. From the reported HECA data, there is clearly a reported significant improvement in energy efficiency across all of the local authorities in the East Midlands. However as the Impact assessment report notes, the HECA itself is not driver behind the improvements in energy efficiency but are being delivered by other policy instruments. Also the report points to potential inaccuracies in the HECA data which sheds some doubt on the validity of the findings. This makes it further difficult to assess the success of HECA.
3. However it is clear from across our own region that there has been an increase in both awareness and understanding of the issues of energy efficiency. In the East Midlands a number of local authorities and partnerships of LA have been very effective in accessing funding from both Warmfront and the Energy Efficiency Commitment to take forward work in this area. The work of Newark and Sherwood District Council as a beacon council for fuel poverty is particularly highlighted. These partnerships have been instrumental in ensuring that national programmes have delivered effectively, so in fact some of the delivery by other policy instruments noted in the report is supported by activity due to HECA. These partnerships are valued by national bodies charged with delivering on domestic energy efficiency. Whatever option is selected for the future of HECA it is important that the expertise of HECA officers and the

partnerships they work with is not lost. The HECA fora and energy partnerships should be maintained.

Do you think HECA promotes the Government's domestic energy efficiency objectives in an effective and proportionate manner?

4. As reported in the Impact assessment, HECA has raised the importance of domestic energy efficiency and has led to the development of strategies and intervention and systems for monitoring and reporting. It has also led to the formation of effective partnerships for delivery and these partnerships are important in delivering against other national programmes as noted before. However, it is now largely these partnerships that are effectively delivering and not the duty of HECA.
5. Data availability is now much improved with DEFRA and DBERR publishing good quality data at LA level. The new suite of indicators linked to delivery of Local Area Agreements includes measures of carbon emissions per capita that will enable comparison across LA and capture any measures enacted at a local level. This, with the ongoing House Condition Survey and Regional Monitoring, largely leaves HECA reporting redundant. This is particularly so as the reporting to date has had serious inconsistencies.

Do you support the findings of the HECA review? Is there any additional information that we should consider?

6. The East Midlands Regional Assembly largely supports the findings of the HECA review.
7. In East Midlands the work of Housing Intelligence East Midlands (<http://www.hi4em.org.uk/>) has been an invaluable tool in establishing and progressing the existing evidence base in relation to private sector stock condition. Thermal insulation as a part of the Decent Homes requirement is a key part of the information collected. This kind of monitoring is effectively delivered at the regional level, it provides more detailed information than the basic DEFRA indicator alone and could represent good value for money if replicated across the English Regions. LA can use the data as evidence to support their Local Area Agreements and other local plans for targeted action.

Which of the options outlined in Section 6 and in the accompanying Impact Assessment on the future role of HECA do you support? Please give reasons in support of your answer

8. As a piece of legislation HECA has largely served its purpose. Climate Change and energy efficiency have now moved up the political agenda

and home energy efficiency is a clear part of that agenda, more deeply embedded within the policy arena. Action within this policy arena is more clearly supported at local and national level. The commitment at local level can be seen through the number of signatories to the Nottingham Declaration.

9. The East Midlands Regional Assembly would support the repeal of the HECA, with the view that the activity supported by HECA should be embedded in LAAs and CPA. Separate reporting does place an unnecessary burden on LA and reduces the opportunities to deliver activity in this key area. We would however again point out the importance of maintaining the networks and partnerships that have grown through HECA activity.
10. The introduction of a new methodology based on SAP ratings would not be supported. This would seem to place a additional burden on LA. We would recommend the use of the central CPA indicators as a means of monitoring, with additional regionally based data, such as contained in HI4EM database to support reporting. This would represent significant savings and support partnership working through LAAs.