

Fuel Poverty Strategy

Strategy to reduce Fuel Poverty within the Borough 2025 - 2030

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1 Vision Statement

To take proactive measures in reducing fuel poverty within the Borough, across all tenures, with the aim of reducing energy bills and increasing thermal comfort for the most vulnerable households.

2 Definition of Fuel Poverty

In England, the Government adopted the Low Income Low Energy Efficiency (LILEE) definition of fuel poverty in 2019. Fuel poverty relates to households that cannot meet their energy needs at a reasonable cost. Under LILEE, a household is fuel poor if:

- they are living in a property with a fuel poverty energy efficiency rating of band D or below; and
- when they spend the required amount to heat their home, they are left with a residual income below the official poverty line.

(Source: GOV.UK. Fuel Poverty Statistics)

This method of measuring fuel poverty classifies only households on both low income and in energy inefficient homes as being in fuel poverty. Households living in homes with an Energy Performance Certificate (EPC)¹ rating of C or above (around 34% of homes in the Borough) are not classed as being fuel poor by this metric, irrespective of their income (EPC data Source: GOV.UK Energy Performance of Buildings Data). Further data relating to this is provided in section 6 Key Statistics.

Within the Council's Climate Change and Green Futures Strategy, Fuel Poverty is defined as 'when a household needs to spend more than 10% of their income to adequately heat their home'. This is in line with the Low Income, High Costs (LIHC) method of measuring fuel poverty. This method primarily focuses on the income of households and the amount they spend on energy.

Furthermore, the Climate Change and Green Futures Strategy states the solution to fuel poverty is to ensure that all householders can achieve 'affordable warmth', that is all householders should be able to heat their home sufficiently to maintain health and wellbeing without spending over 10% of their income.

3 Why do we need a Fuel Poverty Strategy?

Living in a safe and warm home is a basic living standard that should be enjoyed by all. The most recent data (2022) published by the Government identified 13.6% of households within the Borough are in fuel poverty. This is higher than the England average of 13.1% (Source: GOV.UK Sub-regional fuel poverty in England, 2024 report)

The Council is committed to tackling fuel poverty and ensuring that the residents of the Borough have access to support services and the necessary energy efficiency measures to live in a warm and comfortable home. This Strategy aims to improve the lives of low-income households who struggle to keep warm at a reasonable cost.

Cold homes can cause or worsen a range of serious health conditions including heart attacks, strokes, bronchitis, and asthma as well as leading to a deterioration in a home's fabric which could lead to mould and damp. Each year, it is estimated that around 10,000 people die in the

1. LILEE uses the Fuel Poverty Energy Efficiency Rating (FPEER) band rather than EPC; however, in the vast majority of cases EPC and FPEER and EPC are identical

UK as a result of living in a cold home. Research has shown that fuel poverty can also have a significant impact on mental health and is a known risk factor for suicide (Source: National Energy Action).

Since 2021, the UK has witnessed a rapid upsurge in energy prices, which have led to higher energy debt, an increase in customers on prepayment meters 'self-disconnecting' and others having to drastically cut their energy usage. (Source: House of Commons Library, 2024.)

Figure 1 (right) is a chart of average household energy bills over the last 5 years. Although there has been a slight dip from a peak in 2023, the average bill is still 75% higher than it was in 2020.

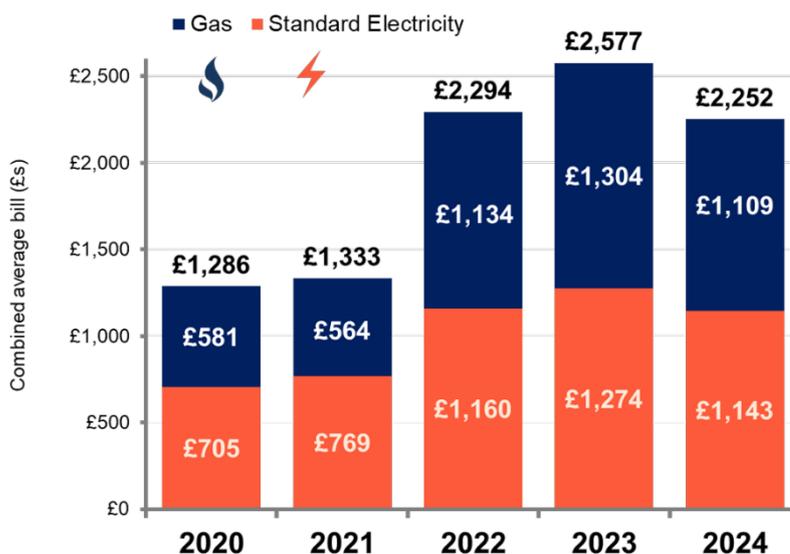


Figure 1: UK Average Household Energy Bills 2020-2024. Source: (GOV.UK. 2024. Quarterly Energy Prices.)

4 Scope of the Strategy

This Strategy is designed provide a framework to develop actions across the Borough to support vulnerable households. The Strategy will bring together various partners who will raise the profile of the issue of fuel poverty, alongside implementing measures to reduce it.

The Strategy covers all tenures within the Borough (owner occupiers, private rented and social housing).

The Council will also commit to exploring joined up approaches to tackling fuel poverty at Countywide or regional levels.

The Fuel Poverty Strategy will be reviewed every two years to ensure that it is relevant, and meets all legislative requirements. The action plan will be reviewed annually.

5 Policy Context

The Council's development of a Fuel Poverty Strategy is underpinned by policy at a National, Regional and Local level and this is detailed in Table 1.

| National | Regional | Local |
|--|---|--|
| <p>Sustainable warmth: protecting vulnerable households in England (Policy paper, 2021)</p> <p>Department for Energy Security and Net Zero's Fuel Poverty Strategy Review (2024)</p> | <p>The health benefits of retrofitting properties to increase thermal efficiency across the East Midlands Combined County Authority</p> | <p>Climate Change and Green Futures Strategy</p> <p>Housing Strategy</p> |

Table 1: National, Regional and Local Policies

In early 2025, the Government started a consultation to review the 2021 national Fuel Poverty Strategy. The consultation will shape a new national Fuel Poverty Strategy for the next 5 years, but will also be used to inform a potential legislative framework to achieve significant progress on reducing fuel poverty by 2030.

6 Key Statistics

13.6% of Borough residents are classed as being in fuel poverty using the LILEE method, (2022 data) which represents approximately 5,000 households (Source: University of Nottingham).

Research by the University of Nottingham, who were commissioned to provide a Borough wide Housing Decarbonisation report, estimates around 1251 homes are wrongly omitted from fuel poverty statistics when homes with an EPC A-C are excluded. Researchers came to this figure by assessing the income of households in EPC A-C properties. This equates to around 3.4% of the entire housing stock and if added to the 13.6% included in the LILEE method, suggests 17% of households in the borough are in fuel poverty, an increase of 25% on the official LILEE statistics.

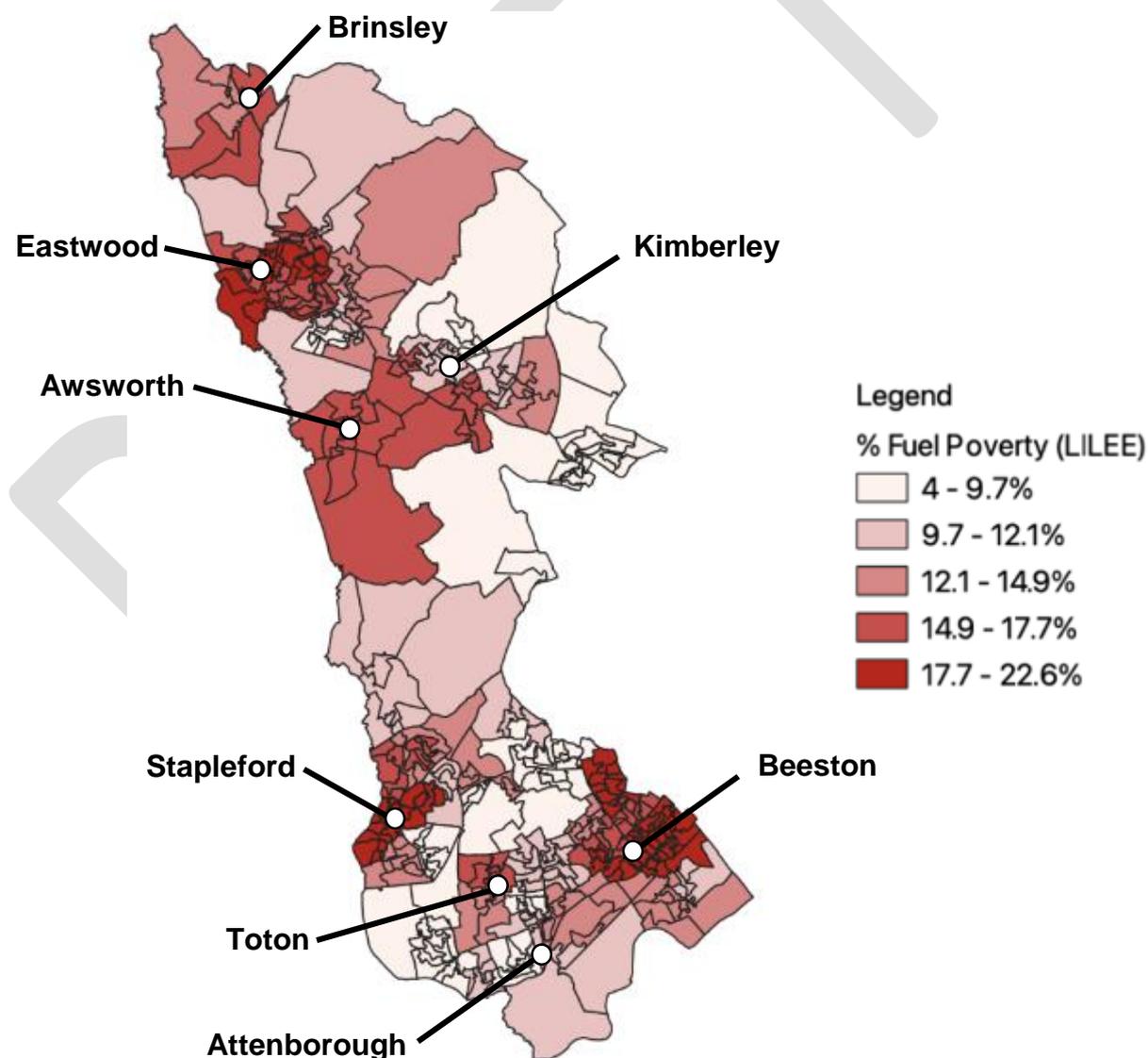


Figure 2 (above) is map of the Borough and shows the level of fuel poverty by the LILEE metric across the Lower layer Super Output Areas (LSOA). Higher levels of fuel poverty

can be shown around built up areas including Awsworth, Beeston, Eastwood, Kimberley and Stapleford.

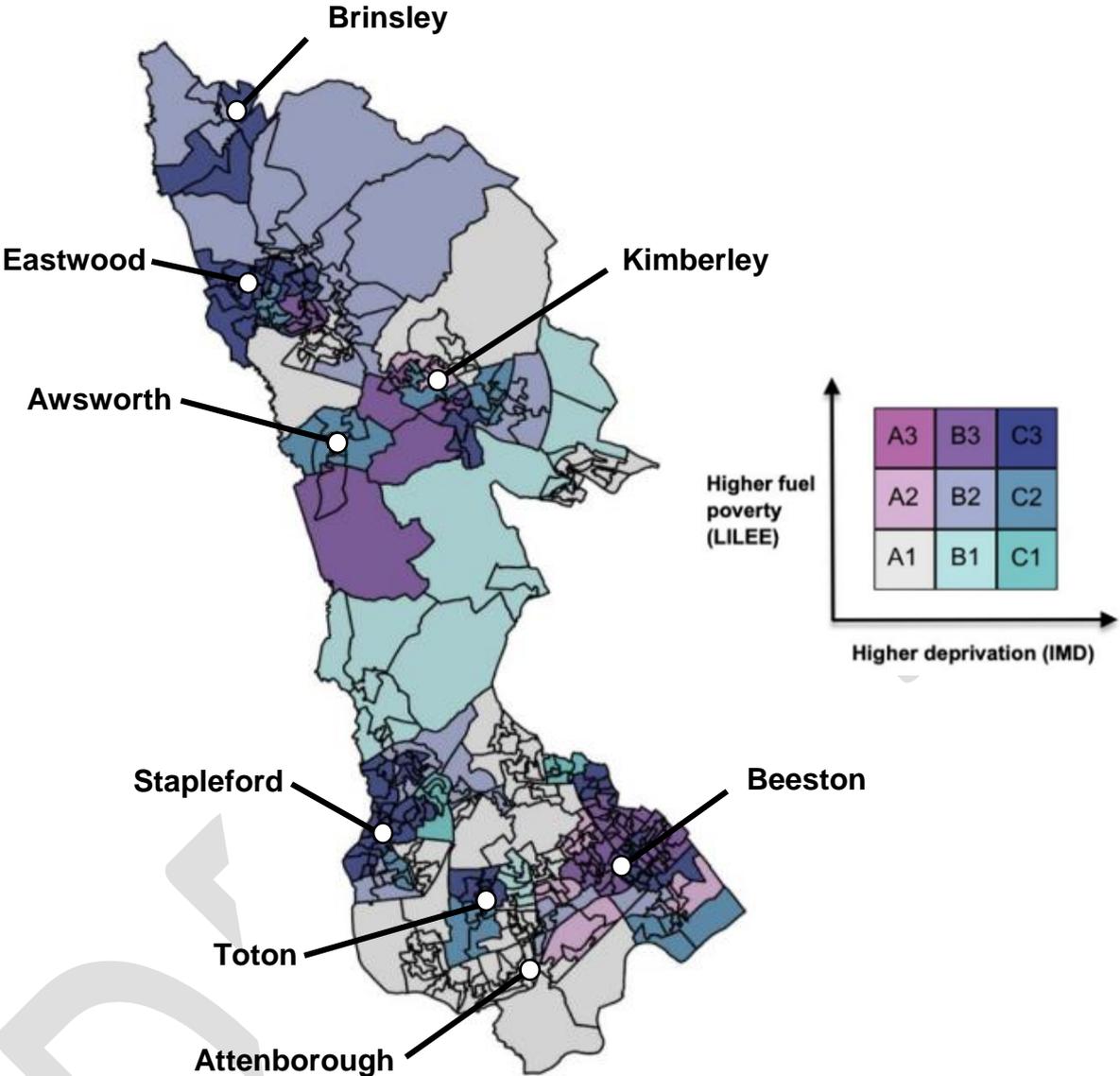


Figure 3 (above) is a bivariate LSOA map of Broxtowe – showing LILEE fuel poverty data (2024) and index of multiple deprivation 2019 data. This map combines both fuel poverty and the index of multiple deprivation. Similarly, to the fuel poverty map, higher levels can be seen around the built up areas. However, it also highlights areas that are considered to have higher deprivation, but are not considered to have higher rates of fuel poverty (B1, C1, C2).

The LILEE fuel poverty definition has known measurement deficiencies (Semple, et al., 2024) that inevitably lead to the omission of some low-income homes from fuel poverty statistics. Research by the University of Nottingham, who were commissioned to provide a Borough wide Housing Decarbonisation report, estimates around 1,251 homes are omitted from fuel poverty statistics when homes with an EPC A-C are excluded. Researchers came to this figure by assessing the income of households in EPC A-C properties. This equates to around 3.4% of the entire housing stock and if added to the 13.6% included in the LILEE method, suggests 17% of households in the Borough are in fuel poverty, an increase of 25% on the official LILEE statistics.

The Council undertook a Household Energy Survey of residents between November 2024 and February 2025. This survey adopted the subjective fuel poverty approach (also referred to as

household energy security) which offers an alternative and more direct means of quantifying fuel poverty. The survey gathered a broader range of fuel poverty experiences in the Borough. Household Energy Survey Headline Findings:

- The *Household Energy Survey* received a total of 322 responses (270 with all fields complete) over the winter 2024/25 period.
- The distribution of household energy security among respondents is shown in *Table 1* (where *very low* = most insecure to *high* = most secure):

Table 1. Distribution of household energy security in Broxtowe (n=322)

| | Household Energy Security | | | |
|------------------------------|---------------------------|------------|------------|-------------|
| | Very low (insecure) | Low | Marginal | High |
| Frequency (% in parentheses) | 8 (2.5%) | 71 (22.0%) | 70 (21.7%) | 173 (53.7%) |

- Energy security is often binaried/aggregated (i.e., 1=very low or low energy security; 0=marginal or high energy security) to allow simple comparisons of energy security (*secure* or *insecure*) and fuel poverty (*fuel poor* or *not fuel poor*) rates.
- In this case, 79 respondents (approximately 24.5%) were *energy insecure*, which is around 80% higher than the rate of LILEE fuel poverty in Broxtowe (13.6%).
- Regarding the results above, a necessary caveat is that the survey did not include a strict sampling strategy; hence, the sample is unlikely to be very representative of the wider Broxtowe population. For example, there appears to be an overrepresentation of those over 65 and an underrepresentation of those below 30.

Further Insight:

- The results show there can be inequality depending on certain characteristics. For example, those with a health problem or disability (97 respondents) were more likely to be energy insecure than those without a health problem. 45% of respondents with a health condition or disability reported having low or very low energy security. In contrast only 16% of respondents without a health condition or disability reported having low or very low energy security. (Note: this is not a statistical relationship – more sophisticated analysis can unveil underlying statistical relationships.)
- Energy security also typically varies depending on household composition; for example, the survey data show that single pensioner households had an energy insecurity rate of (26.2%), while the equivalent rate was only 13.5% in dual pensioner households; further single-parent respondents had an insecurity rate of 50.0%, which is higher than the rate of insecurity among dual-parent homes (38.6%).

7 Summary of previous and current work

The Council has been delivering various projects and services for many years which directly or indirectly reduce fuel poverty. The Council owned housing stock has seen significant investment to improve properties to EPC C and above. Projects include the Social Housing Decarbonisation Fund wave 2.1, which is currently (2024/25) being used to install external wall insulation to over 80 properties. Previously, Local Authority Delivery (LAD) 3 delivered a range of measures to 54 properties (owner occupiers and private renters) during 2023/24. LAD 2 funding was used to install external wall insulation to 158 Council owned properties during 2021/22.

The Energy Company Obligation (ECO) and Great British Insulation Scheme (GBIS) are currently available to owner occupiers and private renters, with a number of suppliers on-boarded in the area to deliver energy efficiency improvement works to residents in the Borough. The Council also provide Warm Homes on Prescription (WHOP) grants to private residents funded through the Better Care Fund, which are used to carry out works to eliminate problems associated with damp and cold. Between 2018 and 2025, works have been carried out to 28 properties through WHOP. Eligibility for ECO, GBIS and WHOP is based on the resident's finances or health, and all schemes are targeted at helping those most in need.

The Council offer a free Financial Inclusion service. This is a service which provides advice and support to residents with the aim of improving income and living standards. Examples of advice and support provided include checking benefits eligibility, supporting with benefit application forms and support with managing debts including liaising with creditors on behalf of residents.

The Household Support Fund is a scheme delivered by Nottinghamshire County Council, with Broxtowe Borough Council able to make referrals to the scheme. It is targeted at those in receipt of benefits related to free school meals or pension credit, or residents can be referred by a professional to the scheme. Phase 6 of the scheme (October 2024 to April 2025) is providing support payments of around £110 each, to eligible applicants.

The Council started a partnership for a Green Doctor service, provided by Groundwork Five Counties in Autumn 2024. The service provides free practical advice to residents on how to save energy and reduce their energy bills. This has been funded through the UK Shared Prosperity Fund, and the funding will enable 100 households to receive support from Green Doctor coaches during the year.

Citizens Advice also provide extensive advice to residents on how to access support with their energy bills.

8 Objectives

The Fuel Poverty Strategy provides the Council with a framework to develop measures to reduce fuel poverty with the following objectives:

1. To reduce the number of residents living in fuel poverty, reducing energy bills, improving thermal comfort and subsequently improving residents' living standards.

The Council can support with the reduction of energy bills through improving energy efficiency. The Council will seek to maximise funding opportunities for energy efficiency improvements across all tenures and develop an engagement strategy to ensure opportunities are communicated to those most in need.

2. To improve processes for identifying residents who are in fuel poverty or at risk of ill health due to a cold home.

The Council will explore different metrics of fuel poverty and take into consideration that some households will be considered fuel poor under certain metrics and others not. The Council will consider a range of metrics to ensure struggling households are not left out from support opportunities due to a particular definition.

3. To increase the number of homes with an Energy Performance Certificate (EPC) of C or above.

The Council will adopt a policy in line with National Strategy to improve the EPC ratings of its own stock to EPC C by 2030. The Council will seek to maximise funding opportunities to coordinate the improvement of EPC ratings in the private sector. By 2030, as many fuel poor homes as reasonably practicable should achieve a minimum EPC rating of band C. Reasonably practicable is defined in the 2021 National Fuel Poverty Strategy (House of Commons Library. (2024) Fuel Poverty).

4. To improve inter-departmental and cross organisational working to implement fuel poverty reducing measures.

The Councils' Cost of Living Working Group meet quarterly and will identify and monitor continued actions to reduce fuel poverty. In addition, the Council will engage both internally and with a range of external parties to improve awareness of the issues associated with fuel poverty and how to refer residents to available support. The Council will explore joined up approaches to tackling fuel poverty.

5. To improve awareness and accessibility of schemes and funding opportunities which reduce fuel poverty.

The Council will regularly review and update published advice relating to fuel poverty. In addition, the Council will develop engagement strategies for fuel poverty reduction schemes to ensure they reach the appropriate audience and the most vulnerable households are able to access the help they need.

9 Governance

The Council currently operates under a Cabinet system, with a Lead Portfolio Holder for each priority area within the Council. Represented on the Cabinet is a Portfolio Holder for Economic Development and Asset Management.

Within the Council, the Fuel Poverty Strategy is managed by the Assistant Director of Asset Management and Development.

Reports on progress will take place via the Cost of Living Working Group, which meet on a quarterly basis. This group provides updates on progress to the General Management Team and the Climate Change and Green Futures Board.

10 Stakeholders

Identifying key stakeholders is crucial in helping to provide strategic direction and delivery of actions captured in the Fuel Poverty Strategy. It ensures that the right people are involved in the planning and implementation process and that their needs and interests are taken into account. Key Stakeholders for the Fuel Poverty Strategy are identified in Table 2:

| Internal | External |
|--|--|
| Members (Councillors) | Residents |
| General Management Team | Tenants |
| Head of Asset Management and Development | East Midlands Combined County Authority (EMCCA) |
| Capital Works Team | Nottinghamshire County Council |
| Private Sector Housing Team | Nottingham City Council and other local Borough Councils |
| Housing Team | Citizens Advice Bureau |
| Communications Team | Nottingham Energy Partnership |
| Climate Change Manager | NHS, Health Centres, GPs |
| Environment team | Charities - Food banks |
| Communications Team | Energy Saving Trust |
| Planning Team | Social Housing providers |
| Cost of Living group | Landlords |
| Climate Change and Green Futures Board | Local Businesses |
| | Energy Companies |
| | Schools, Colleges, Universities |
| | Libraries |
| | Local Community and Faith Centres |

Table 2 – Stakeholders

11 Measuring Success

The Council will measure the success of this Strategy in achieving its key objectives. An annual review will take place on the actions of the Strategy in order to monitor progress. A

summary of progress will be provided to the General Management Team and Cabinet on an annual basis. Success will be measured by the following:

1. Reduction in the official fuel poverty rate for the Borough across the Strategy period.
2. A significant increase in the number of homes achieving an EPC C or above. As many fuel poor homes as reasonably practicable are to be upgraded by 2030 (see section 8 Objectives).
3. Surveys of residents will be conducted to quantify awareness and the level of fuel poverty in the Borough. Success will be measured through an increase in the awareness of fuel poverty and its effects and a reduction in the number of residents who consider themselves to be fuel poor.

12 How the Strategy has been developed?

In July 2019, the Council declared a Climate Emergency and made an ambitious commitment to become carbon neutral by 2027. The Climate Change and Green Futures Strategy 2023 - 2027 included an action to develop a Fuel Poverty Strategy identifying measures to address the impacts of fuel poverty on residents of the Borough. Tackling fuel poverty goes hand in hand with tackling the Climate Emergency, with energy efficiency measures both reducing carbon emissions and providing savings on bills for residents.

In 2024, the Council entered into an agreement with the University of Nottingham (Department of Architecture and the Built Environment) to gain a comprehensive understanding of the energy efficiency of the housing stock (all tenures) within the Borough. As part of this, the University is reviewing the Borough's fuel poverty data and definitions of fuel poverty, providing research that has helped inform the Council's Fuel Poverty Strategy.

In order to obtain further data on fuel poverty, Broxtowe Borough Council has conducted a Household Energy survey between November 2024 and February 2025. The purpose of this survey was to gather information on Fuel Poverty including identification of fuel poor households that fall outside of the LILEE definition. A summary of findings has been included in section 6 Key Statistics.

13 Funding Opportunities

The Council commits to exploring all opportunities that arise that will benefit residents and reduce fuel poverty.

In 2025, two significant schemes will start, targeting energy efficiency improvements in both social and private sector. These are the Warm Homes Social Housing Fund (social housing) and the Warm Homes Local Grant (private sector housing). There is scope for other funding opportunities to become available including through the recently formed East Midlands Combined Authority

14 Action Plan

| Ref | Action | Target for 2025/26 | Responsible Officer | Cost |
|-----|---|---|------------------------|------|
| 1 | To reduce the number of residents living in fuel poverty, reducing energy bills, improving thermal comfort and subsequently improving the residents' living standards. | 1a. Quarterly progress reports are to be provided via the Cost of Living Working Group to GMT. | Capital Works Manager | £ |
| | | 1b. Monitor fuel poverty statistics provided by the Government and provide updates to the Cost of Living Working Group following new data releases. | Capital Works Manager | £ |
| 2 | To improve processes for identifying residents who are in fuel poverty or at risk of ill health due to a cold home. | 2a. Engage with University of Nottingham to assess methods of Fuel Poverty data and analyse the results of the Fuel Poverty survey conducted over winter 2024/25. | Climate Change Manager | £ |
| | | 2b. Provide training to front line staff on awareness of fuel poverty and where to access advice (see also action 4c) | Capital Works Manager | £ |
| 3 | To increase the number of homes with an Energy Performance Certificate (EPC) of C or above. | 3a. Obtain up to date EPCs on all Council houses and monitor ongoing EPC statistics. | Capital Works Manager | ££ |
| | | 3b. Research, monitor, and implement new funding schemes for energy retrofit measures for both social and private sector housing. Deliver improvements and support delivery partners through the Warm Homes Social Housing fund, Warm Homes Local Grant, ECO 4, WHOP and any other scheme that becomes available. | Capital Works Manager | £££ |

| Ref | Action | Target for 2025/26 | Responsible Officer | Cost |
|-----|--|---|--|------|
| | | 3c. Proactively identify Private Sector homes with F and G EPCs and provide advice on access to funding where appropriate. | Capital Works Manager | £ |
| 4 | To improve inter departmental and cross organisational working to implement fuel poverty reducing measures. | 4a. Engage with external stakeholders identified within this Strategy to review their existing approach to fuel poverty and the support they can provide to reduce fuel poverty. | Capital Works Manager | £ |
| | | 4b. Coordinate a Fuel Poverty advice matrix which will enable organisations to direct residents to the most appropriate support. | Capital Works Manager/ Climate Change Manager | £ |
| | | 4c. Improve awareness of Fuel Poverty and measures to tackle it amongst internal staff. Make use of internal communications and training to raise awareness of fuel poverty and how to direct residents to appropriate support. | Capital Works Manager/ Climate Change Manager | £ |
| 5 | To improve awareness and accessibility of schemes and funding opportunities which reduce fuel poverty. | 5a. Develop and update Fuel Poverty communication plans for different tenures, including Council owned housing, Owner occupiers and Private or Housing Association renters. Communication plans to include directions to access Energy Savings advise and schemes that specific tenures may be able to access to reduce fuel poverty. Plans must address improving awareness amongst hard to reach communities. | Capital Works Manager | £ |
| | | 5b. Establish a regular fuel poverty awareness campaign via social media, local communications, local communities' facilities | Capital Works Manager/ Climate Change Manager | £ |

| Ref | Action | Target for 2025/26 | Responsible Officer | Cost |
|-----|--------|--|--|------|
| | | (libraries, children's centres), Faith centres, foodbanks etc. | | |
| | | 5c. Regularly update the website to ensure information is up to date and includes information about all current schemes. | Capital Works Manager/ Climate Change Manager | £ |

£ = low cost scheme, small capital cost or staff time only

££ = medium cost scheme, some capital cost and more intensive staff time

£££ = high cost scheme, significant capital cost and investment of staff time

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