# Agenda Item 4

Report to: Lead Member for Resources and Climate Change

Date of meeting: 14 June 2022

By: Assistant Chief Executive

Title: Partnerships for People and Place project: award of grant

Purpose: To seek the agreement of the Lead Member to enter into a grant

agreement with CA1066 in relation to the delivery of the

Partnerships for People and Place project

#### RECOMMENDATIONS

The Lead Member for Resources and Climate Change is recommended to:

- 1) Approve the entering into of a grant between East Sussex County Council and Citizens Advice 1066 (CA1066) for delivery of stage one of the East Sussex County Partnerships for People and Place project; and
- 2) Delegate authority to the Assistant Chief Executive in consultation with the Chief Finance Officer to agree the amount of the grant, the terms of the agreement and whether to extend the agreement to include stages two, three and four of the programme and the level of grant awarded to CA1066 for those stages.

#### 1 Background

- 1.1 In July 2021, East Sussex County Council was one of 34 local authorities invited by the Department for Levelling Up, Housing and Communities (DLUHC), to submit an Expression of Interest (EOI) to fund a place-based project in their area, which would benefit from joined-up working between the local community and local and central government departments as part of the Partnerships for People and Place (PfPP) programme.
- 1.2 The overarching aim of the PfPP programme is to test a new collaborative approach to policy design and delivery through better co-ordination within and between central government and local places and to determine whether this approach improves efficiency and outcomes of place-based policy.
- 1.3 East Sussex County Council was one of 13 local authorities shortlisted for the programme in November 2021. Our selected proposal was to undertake a project with partners from Hastings Borough Council and the voluntary and community sector focusing on tackling fuel poverty and energy efficiency within the private rented sector in Hastings and St Leonards. This proposal was co-designed by officers from our environment and Public Health teams and officers from Hastings Borough Council's climate change and housing renewal teams, in association with partners from the voluntary and community sector. The interventions identified through this process should secure both improvements to health and environmental outcomes and generate and retain value locally.
- 1.4 Shortlisted authorities were invited to submit a delivery plan to DLUHC. Our submitted plan (Appendix 1) has been approved in principle by DLUHC. They have confirmed that we will receive the full amount of funding of £335,000 that we requested as part of our delivery plan.
- 1.5 The next stage for us and our partners is to begin delivery of the project, which will be overseen by a partnership governance arrangement in line with the PfPP criteria.

#### 2 Supporting information

#### Project focus

2.1 The focus on improving energy efficiency and fuel poverty in the private rented sector was selected as it meets the key criteria for PfPP and supports our corporate work on climate

change. The project can build on existing interventions, has links to central government priorities, and provides opportunities to overcome some of the barriers caused by a lack of joined up working. These barriers include siloed working, the stop-go nature of many programmes, including those funded by central government, and that levers to drive change are held by different organisations at different levels (national vs local). Unblocking these barriers could lead to a more sustained programme of activity which achieves long-term benefits to households living in fuel poverty and for the environment.

2.2 The PfPP project requires a focus on a 'hyper-local' area, such as a small number of wards. Castle, Central St. Leonards, and Gensing wards were selected as the target areas for our proposal because data shows that these wards have a large proportion of privately rented accommodation compared to national and local averages, high levels of households living in fuel poverty, a high proportion of homes with poor energy efficiency (with an Energy Performance Certificate score of either F or G), and a higher than average proportion of residents who have a limiting long-term illness or disability. It is anticipated that learning from this project will be applicable to other areas across East Sussex.

#### Proposed project delivery

2.3 The project runs from April 2022 to March 2023 and will be delivered in four stages:

<u>Stage One</u>: Engagement with landlords and tenants to better understand the current barriers to making energy efficiency improvements in properties and the impact of housing standards on tenants' health and wellbeing;

<u>Stage Two</u>: Working collaboratively with central government partners, analyse responses gathered during stage one and co-design changes and flexibilities to the implementation of current programmes and funding eligibility requirements for energy efficiency improvements in target households;

<u>Stage Three</u>: Pilot the delivery of the flexible approach with tenants and landlords to increase the number of energy efficiency improvements, reduce fuel poverty and improve tenant health:

<u>Stage Four</u>: Evaluate and capture learning to inform a more sustained programme of activity in the local area and elsewhere.

- 2.4 As this is an experimental pilot it is possible that we will need to amend the planned activities with tenants and landlords following the engagement activities and discussions with central government partners during the early stages of the project. A degree of flexibility will be built into our project plan to accommodate these possible changes, and there will be robust oversight of the project through our planned governance arrangements to mitigate any associated risks. As the aim of the project is to test what is possible, DLUHC have confirmed such changes will not negatively affect their evaluation of the project.
- 2.5 As the lead authority, East Sussex County Council will be responsible for the project including all project activity, engagement with central government, and the evaluation process. However, working with partners with experience of local issues and networks will be key to ensuring the project successfully engages with local landlords and tenants.
- 2.6 To ensure effective delivery within the timescales available for the project, it is proposed that East Sussex County Council provide funding to a local organisation, Citizens Advice 1066 (CA1066), to lead on stage one of the project. Stage one will cover the initial engagement activities with tenants and landlords. CA1066 are uniquely placed to engage with Hastings residents for several reasons: they provide an established community service and have a strong reputation for effective liaison with residents, including those who have additional needs; they have knowledge of current government policy and interventions relating to fuel poverty, and they have experience of providing advice and guidance to residents living in a cold home via the Warm Home Check service. In addition, CA1066 recently supported a similar, smaller project focused on energy efficiency improvements in the local area, the learning from which can be used to inform the engagement activities as part of PfPP.
- 2.7 CA1066 have indicated a cost of £44,544 to deliver stage one of the project, which covers all staffing and resource costs. We consider that CA1066's proposals represent value for money and that their plan covers all work required for stage one of the project. A consultant with experience in delivering place-based projects who worked with us on the initial bid and

project setup, and will continue to work with us throughout PfPP, has reviewed CA1066's proposed bid and confirmed that it is well-planned and appropriately costed. The nature and amount of the support required for stages two to four of the project is dependent on the initial outcomes of stage one, and therefore will be reviewed at that time. Approval is sought to award a discretionary grant to and enter into a grant agreement with CA1066, initially this will be for the delivery of stage one, following which their involvement will be reviewed. It is recommended that authority be given to the Assistant Chief Executive in consultation with the Chief Finance Officer to decide at that time whether to extend the involvement of CA1066 to stages two, three and four and, if so, to determine the level of grant to be awarded for those stages.

- 2.9 The governance arrangements for the project include a Local Place Working Group who will be responsible for the delivery of project activity, a Local Place Board who will monitor project activity and take key strategic decisions in relation to actions and expenditure, and a PfPP Board who will be responsible for considering how to sustain the central-local partnership beyond the lifetime of the PfPP project (see Appendix 2 for a diagram of the governance arrangements). If the grant funding is approved CA1066 will be part of the Local Place Working Group, with work on stage one of the project overseen by the Local Place Board.
- 2.10 The Local Place Board, who have reviewed and approved CA1066's proposals, comprises the following members:
  - Philip Baker, Assistant Chief Executive and PfPP Senior Responsible Officer, ESCC
  - Victoria Beard Head of Performance, Research and Intelligence and PfPP Data and Evaluation Lead, ESCC
  - David Bishop Health Improvement Principal (Communities and Settings), ESCC
  - Kate Hall-Wright, PfPP Policy Lead, DLUHC
  - Lizzy Hawkins Assistant Director, People, Places and Communities, DLUHC
  - Rachel Jarvis Head of Finance (Planning and Reporting) and PfPP Finance Lead, ESCC
  - Harriet Judson, Executive Support Manager and PfPP Project Lead, ESCC.

#### 3 Conclusion and recommendations

- 3.1 DLUHC have approved our delivery plan for the Partnerships for People and Place project, which focuses on improving energy efficiency and fuel poverty in the private rented sector in Hastings.
- 3.3 The Lead Member is asked to note the project summary and approve the entering into a grant agreement with Citizens Advice 1066 to enable the delivery of stage one of the Partnerships for People and Place project. It is also recommended that the Lead Member delegate authority to the Assistant Chief Executive to agree the terms of the grant agreement, and to agree to extend the agreement if considered appropriate after delivery of stage one, including the amount of funding to be allocated to each of the phases.

#### PHILIP BAKER

#### **Assistant Chief Executive**

Contact Officer: Harriet Judson, Executive Support Manager

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Email: harriet.judson@eastsussex.gov.uk

#### **LOCAL MEMBERS:**

Councillor Godfrey Daniel - Braybrooke and Castle

Councillor Trevor Webb - Central St Leonards and Gensing

# **APPENDICES**

Appendix 1 – Partnerships for People and Place delivery plan

Appendix 2 – Governance arrangements diagram

### Partnerships for People and Place: Delivery Plan Template

1.1 Local Authority	East Sussex County Council	
1.2 Named contact (a) name (b) main role	(a) Harriet Judson	(b) Executive Support Manager
1.5 Email address of named contact	Harriet.Judson@eastsussex.g	jov.uk

#### **Guidance notes**

- The purpose of this delivery plan is to build on your initial ideas set out in your expression of interest, or to help structure the planning of a new idea, and to set out a theory of change and costed proposals for how you intend to deliver your intervention through Partnerships for People and Place.
- This delivery plan will be a live document, with flexibility to develop over the course of the delivery period and designated review points.
- Please also refer to the <u>Partnerships for People and Place gov.uk page</u>, which
  provides further detail on the aims and objectives along with the ask and offer
  for the project.
- We may share information in your delivery plan, including contact details, with other government colleagues for review and for the purpose of developing our understanding and informing wider policy development and best practice.
- Please use black type, Arial font 11. Where additional supporting materials such as the theory of change template are requested, further information is provided in the questions and guidance below. The deadline for submission is 18<sup>th</sup> February 2022.

#### 1. Context and Evidence of Need

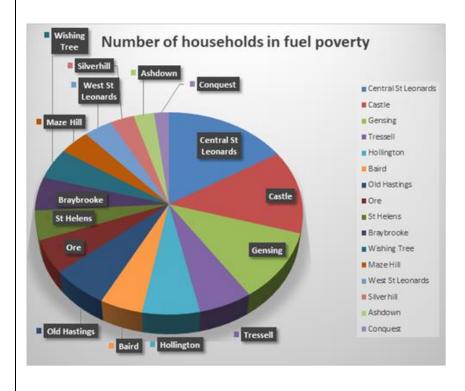
Please provide information on the context and need for the project you intend to work with over the course of the programme.

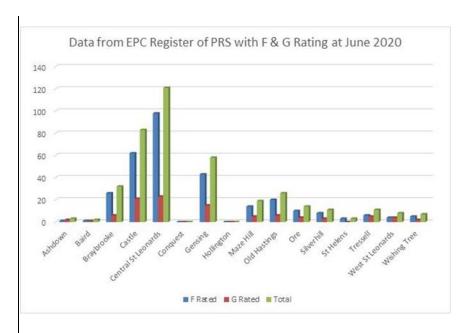
#### Max: 600 words

The East Sussex/Hastings project will pilot ways of more effectively tackling fuel poverty and poor energy efficiency in the private rental sector (PRS) in the Castle, Central St Leonards, and Gensing wards of Hastings, the most deprived local authority in the South East. We aim to do so in a way that secures both health and environmental objectives and generates and retains value locally.

2019 ONS data estimates that 29.6% of Hastings dwellings are privately rented compared to an average 17.3% in England. There is extensive evidence that energy efficiency standards are low in the PRS. Households in this tenure are more likely to live in fuel poverty, which can have a detrimental impact on residents' health. PRS properties also account for a disproportionate number of fuel poor households (26.8% of PRS households, compared with 18.4% of social housing and 8.2% of owner-occupied households in England – LILEE measure, BEIS 2021).

<u>Fuel poverty statistics</u> show that Hastings (10.8%) has the highest percentage of fuel poor households among local authorities in the South East. According to 2020 Home EPC data, our target wards have the three highest numbers of PRS homes rated F-G and the highest number of households in fuel poverty in Hastings (see charts).





This problem is compounded in houses of multiple occupation (HMOs) with several freeholders/leaseholders, which makes engaging with landlords and securing improvement works more difficult. Relationships between landlords and tenants can be problematic. The cost of improvement works in these properties is high because they have been poorly converted and are in conservation areas. There is also a danger of unintended consequences of policy interventions which may lead landlords to take properties off the market.

Using available data, a conservative estimate of the number of fuel poor PRS households in target wards is **575** (based on 1,942 fuel poor households in target wards and 29.6% of PRS properties in Hastings). The proportion of privately rented properties in target wards is thought to be significantly higher than the Hastings average (between 50-60% of all households), so this figure is likely to be greater. However, the figure does not exclude properties that are ineligible for measures (EPC C or above).

Several local programmes address energy efficiency and fuel poverty, which are set out in Section 8. These provide a framework for delivering this proposition and potential contacts with landlords/tenants. There is also a network of partnership arrangements in Hastings which could be used to support the delivery of a more integrated, joined-up programme of activity, and which could be bolstered through direct links into central government.

We have identified at least four barriers to action to tackle fuel poverty and improve energy efficiency in the PRS which we think could be tackled through improved co-ordination between central government and local partners:

• The dependence of funding under the Local Authority Delivery (LAD) and Home Upgrade Grant (HUG) programmes on tenant eligibility combined with the requirement for landlords to contribute a third of costs. Approximately 60% of Warm Home Check service clients across East Sussex who receive home visit assessments live in privately rented properties. Previous projects providing (mostly) fully funded major heating and insulation measures have delivered a similar proportion of upgrades for privately rented properties e.g., 112 (61%) of 184 installations completed through a former NHS Hastings & Rother CCG-funded scheme, and 85 (68%) of 125 installations through a current National Grid Warm Homes Fund scheme. However, so far, just 16 (7%) of the 224

households identified for measures through Green Homes Grant LAD 1A and 1B projects in East Sussex have been in PRS properties. For Hastings, it is just 1 (2%) of 45 households. The specific barriers to achieving low carbon heating and insulation upgrades to PRS properties through these Hastings schemes would benefit from further exploration.

- The difficulty of funding works in HMOs involving more than one tenant and several leaseholders/freeholders.
- The wide variety of landlords and their circumstances, the cost of works in poorly converted buildings in conservation areas and the fact that work to improve energy efficiency is often far more extensive than that required to retain a building in "good repair".
- The need to support tenants and enable behaviour change to initiate improvement works and maximise their benefit.

We think these barriers could be tackled through better local-central coordination because:

- levers to drive change are held by different organisations at different levels (national vs local);
- challenges are exacerbated by the stop-go nature of many programmes, including those funded by central government, as referenced in the <a href="CMO's Health in Coastal">CMO's Health in Coastal</a>
   Communities report: "...Relatively short-term funding is cited as not being focused long enough to create generational change." this programme can help understand the opportunities for longer-term integrated solutions
- problems are often tackled in siloed approaches, so energy and health outcomes are not tackled collectively. Often one outcome is prioritised over another and opportunities to optimise outcomes are missed.

We aim to develop a better understanding of the barriers to action, co-design ways of overcoming barriers with central government partners in line with Levelling Up White Paper ambitions to improve the quality of housing, and pilot delivery of a more integrated approach delivering health and environmental benefits.

#### 2. Identifying and Mobilising Stakeholders and Local Communities

Please provide information on the cohort and stakeholders you intend to work with over the course of the programme.

#### Max: 600 words

The key local organisations involved in the project are: East Sussex County Council, Hastings Borough Council, and voluntary organisations including Citizens Advice 1066. The East Sussex Energy Partnership will provide input; membership includes local authorities across East Sussex, East Sussex CCG, Citizens Advice East Sussex, Sussex Community Development Association, Action in Rural Sussex, utility distribution network operators, East Sussex Fire & Rescue Service, National Energy Action (NEA) and local community energy organisations such as Energise Sussex Coast.

The lead provider of the Warm Home Check service, RetrofitWorks, manages a cooperative of local energy installers and advocates of energy efficiency improvements. RetrofitWorks has access to local supply chains and is experienced in designing and hosting energy efficiency schemes, including accessing ECO funding.

We are proposing a four-stage approach, each will involve different types of engagement with tenants, landlords and government departments. The stages are:

One: engagement with tenants/landlords;

Two: co-design with government;

Three: pilot delivery;

Four: evaluation.

Engagement with tenants will be important in stages one, two and four. We plan to recruit tenants to participate via a range of channels as detailed in section 5. In stage one, we would obtain their perspectives on the barriers to action through a mix of focus groups and interviews. We would provide them with support during the delivery stage and obtain their contribution to the evaluation through further interviews.

We would identify landlords via the Warmer Sussex Programme, a BEIS-funded domestic energy efficiency retrofit supply chain demonstrator pilot aimed at increasing the delivery/uptake of energy efficiency upgrades of those 'able-to-pay', existing landlord forums, and Hastings housing databases (subject to GDPR protocols). Our aim is to involve landlords who have been unwilling to engage with previous schemes; we want to create a safe space in stage one to enable them to share their perspectives. A key objective of stage three is to secure their participation in a programme to improve the energy efficiency of their premises which addresses the barriers identified in stage one. We hope to engage three of the categories of landlord identified by DLUHC (accidental; semi-professional; professional), including landlords involved in at least one HMO. Landlords would also be involved in the evaluation.

The number of direct beneficiaries will be predicated on the outcomes of stages one and two, which will enable us to identify with some accuracy the number of PRS households in fuel poverty (see current estimates in section 1) in our target wards and the cost of supporting beneficiaries.

We envisage involving the following government departments:

- DLUHC (including PRS officials);
- DHSC;
- NHS England & Improvement;
- HM Treasury;
- BEIS.

Their engagement is crucial to the co-design stage. We are also keen to secure their involvement in stage one to hear first-hand the views of stakeholders on the barriers to action – and in stage four so they have a good understanding of the impact of, and the learning from, the programme. We envisage that the co-design process will involve three facilitated workshops involving central and local government officials to: evaluate findings from stage one, identify barriers to the delivery of action to improve energy efficiency in the PRS; and to design ways of overcoming those barriers. These workshops will also provide the opportunity for central government partners to feed in evidence about what interventions work, highlight relevant datasets to help us design evidence-based solutions, and allow us to identify and leverage any new funding pots which could support this project. We will build on the relationships we have already established with central government since November 2021 via two cross-government meetings, use the PfPP governance structures and access

to central government officials to feed learning back into the design of future health and environment policy.

We will ensure that recruitment of stakeholders takes account of diversity / equality considerations. We will conduct a high-level Equality Impact Assessment before the engagement stage. Once we have identified the specific needs of stakeholders, we will develop a more in-depth assessment tailored to their support requirements.

The project will be targeted to people who are vulnerable to the cold (according to NICE 2015 recommendations), in or at risk of fuel poverty, living in the least energy efficient (below EPC C) homes and who are eligible for the home visit element of the Warm Home Check service. People eligible for a Warm Home Check home visit are those living in private tenures on qualifying benefits or on low income and living with a long-term health condition or disability.

It is expected that where home improvements are provided through the government's Sustainable Warmth scheme (LAD and HUG), households receiving measures will have a combined annual income of no more than £30,000 before housing costs and where benefits are counted towards this figure.

#### 3. Options Analysis

Please provide information on your options for delivery and analysis showing how each provide value for money.

#### Max: 600 words

# Option 1: Implementation of enhanced enforcement of Housing Health and Safety Standards in private rented accommodation.

Costs/resourcing implications: Recruitment of additional enforcement staff, greater administrative burden in relation to enforcement activities such as processing and recovering penalties, greater burden on court service and inherent cost of proceedings.

Benefits: A more rigorous and appropriately funded enforcement system.

Risks: Level of investment needed to make material difference would be significant and would need to be ongoing. Investment not utilised for material benefit. Stricter enforcement could lead to accommodation being taken off the rental market to avoid non-compliance and effectively drive the problem underground as tenants may be concerned about losing their property, therefore creating a culture of non-reporting. Option doesn't effectively optimise links into central government.

# Option 2: Expansion of energy efficiency/fuel poverty-related advisory and guidance services for landlords and tenants to improve understanding of the benefits to making housing improvements

Cost/resourcing implications: Development of existing services such as the Warm Home Check Service (staff recruitment, increased availability of guidance documents/websites/other communications tools such as provision of advice)

Benefits: Improved landlord and tenant awareness of the benefits to making energy efficiency improvements, leading to better overall standards in the PRS, better

environmental outcomes and reduced risks of harmful impacts on health and wellbeing of tenants as a result of living in a cold home.

Risks: Insufficient evidence to indicate that a lack of awareness is a significant problem. Existing schemes already provide a good service, therefore expansion of said schemes may not lead to material change commensurate to proportionate levels of investment. Central government could provide advice on guidance expansion, however, majority of work would be focused at a local level, and so option less able to effectively test PfPP programme hypothesis.

Option 3: Directly making energy efficiency improvements in privately rented households in the three wards, such as better insulation and decarbonised heating systems, and meeting total cost of these improvements.

Cost/resourcing implications: Purchase and installation of improvements.

Benefits: Immediate improvements to energy efficiency and ability to maintain warmth in housing, leading to better environmental outcomes and reduced risks of harmful impact on health and wellbeing of tenants as a result of living in a cold home.

Risks: Significant cost implications meaning a reduced number of buildings can be included in project. No focus on landlord or tenant behaviour change meaning improvements may not be utilised effectively or maintained. Lack of stakeholder investment and outcome, including from central government.

Option 4 (preferred option): Testing forthcoming government proposals relating to new minimum standards for rented homes and trial flexibilities, where permissible, within the regulations and funding eligibility requirements for energy efficiency improvements in target households, co-designed by central and local government with input from landlords and tenants.

Cost/resourcing implications: Increased improvements if eligibility is widened and/or subsidies are increased. Engagement and consultation activities, increased investment in behavioural change strategies.

Benefits: Central/local government develop an enhanced understanding of previous barriers to improvements, leading to more holistic policy development. Relationship building with and between landlords and tenants. Improved landlord awareness of the benefits of energy efficiency improvements, leading to better overall standards in the PRS, better environmental outcomes and reduced risks of harmful impact on health and wellbeing of tenants as a result of living in a cold home.

We have selected Option 4 as the most holistic, long-term approach to tackling the health/environmental issues arising from fuel poverty and poor housing standards. Option 4 provides the most meaningful opportunities for central and local government to collaborate to improve outcomes and involve tenants and landlords in the process. It also allows for a more open and genuine dialogue between stakeholders and government. This option best balances innovation and ambition (in terms of collaboration & potential impact) vs. what is possible/pragmatic in the lifetime of the programme.

# 4. Outline theory of change: How will the programme achieve improved outcomes at individual and system level?

Please set out your outline theory of change at system and individual level using the templates provided (annex A). Use the section below to provide a brief overall narrative explaining how you developed the theory of change and how the different levels connect.

#### Max 2,500 words (templates & summary)

Our Theory of Change (see Annex A) has been developed with input from local partners in Hastings Borough Council Housing Renewal and Climate Change teams, Public Health colleagues working with the Warm Home Check Service, colleagues from Citizens Advice 1066, and central government partners. All local partners have lived experience expertise and have directly supported or worked with our target audience.

Local partners attended several meetings to review current fuel poverty and energy efficiency schemes and available local evidence to decide on short and long-term outcomes for the project. Partners then agreed what activities and inputs would be required to deliver these outcomes. Central government partners were then invited to a workshop to review the draft Theory of Change (ToC) and offer feedback.

We have structured our ToC to reflect the four distinct stages of activity and three groups of participants/beneficiaries.

#### The four stages are:

- Initial engagement with tenants and landlords;
- Co-design of flexibilities;
- Pilot delivery;
- Evaluation.

Each stage features in the ToC with associated inputs, activities, outputs, outcomes, and impacts.

#### The three groups are:

- Key colleagues in central and local government and other partners;
- Tenants living in privately rented properties in the three target wards;
- Landlords of privately rented properties in the three target wards.

In the ToC we have endeavoured to be clear about the activities, outputs, and outcomes relevant to each group.

Our ambition is that the wider application of lessons from this pilot will contribute to long-term impacts such as reduced health service utilisation (e.g., A&E admissions), improved energy efficiency (behavioural changes and/or property upgrades) and reduced fuel consumption. We have also identified long-term outcomes, such as improved health and wellbeing and contribution to net zero. It is clear however that these impacts and outcomes will not materialise during this pilot, except for improved energy efficiency in individual properties which can be measured through EPC ratings. The ToC therefore identifies a series of short-term impacts and outcomes which should be capable of being measured, including increased investment in fuel efficiency in the three wards, increased tenant

engagement in the opportunity of improved energy efficiency and tenants acting in ways which maximise the benefits of the new features.

#### 5. Delivery

Please set out your plan to deliver the activity in your outline theory of change over the programme lifecycle.

#### Max 1,250 words

We are planning a four-stage process:

Stage 1: Engagement with tenants and landlords (freeholders/leaseholders) to identify key project stakeholders and develop a deeper understanding of the barriers to investment in improved energy efficiency in privately rented accommodation and the impact of housing standards on residents' health and wellbeing.

Estimated time: Three months (initial comms and targeted engagement)

#### Activities:

- Establishment and agreement of project officer roles and responsibilities
- Initial communications, including social media/web marketing, articles in relevant newsletters (e.g., Hastings Borough Council News), mailouts and door-to-door visits, contact via the National Landlords' Association, utilisation of existing engagement with eligible low-income residents (via the Warm Home Check Service and other schemes) and existing databases held by Warmer Sussex and Hastings Housing Officers (dependent on data protection), and contact via lettings agents in the area. We want to work with central government to design these comms based on what works and utilise central networks to help promote.
- Engagement with identified stakeholders, including focus groups and/or 1:1s, networking events, surveys, and building visits. We will provide opportunities for landlords and tenants to speak freely about the barriers to making energy efficiency improvements in private rented accommodation. We will also ask for feedback on our proposal to co-design an amended approach to the implementation of housing standards programme and funding eligibility requirements with central government, and test potential flexibilities with them. We would like central government to be actively involved in this local engagement. By making landlords/tenants feel like their views are really being heard by those leading policy, we hope to encourage strong engagement as tenants/landlords feel like there is an opportunity for genuine change.
- Work with central government to understand in more detail what flexibilities have been trialled previously and what has and hasn't worked.
- Work with central government to understand what central government lead groups/wider networks this project could plug into.
- Work with central government behavioural insight teams to understand how behavioural science could help offer frameworks to enable identification and

categorisation of barriers – which is important for inferring meaning, linking to relevant solutions and ensure barrier analysis is comprehensive.

Stage 2: A co-design process with government officials to develop changes and/or flexibilities in relation to implementation of current programmes and funding eligibility requirements for energy efficiency improvements in target households.

Estimated time: One month (data analysis, co-design, concept testing, refinement – workshop dates and structure to be agreed during stage 1)

#### Activities:

- Analysis of responses/data gathered during stage 1 to determine in more detail what the current barriers to making energy efficiency improvements are and how these could be addressed.
- Co-design of response with central government including agreed flexibilities to implementation of current programme, regulations (where permissible), advice, guidance and funding rules which will encourage increased take-up of energy efficiency improvement opportunities, e.g.:
  - Subsidised improvement works
  - Explore and agree changes to eligibility requirements and allowable subsidy levels. For example, developing landlord application processes that take into account landlord circumstances, as well as tenant eligibility, and develop mechanisms to ensure that PRS properties receiving upgrades remain available for target groups. Engagement exercise to seek responses to/concept test possible changes
- Development of advice and guidance for tenants and landlords
- Development of behaviour change guidance/interventions working with central government behavioural insight teams; as identified by the BEIS Behaviour Insights team, a common issue with behaviour change programmes is the lack of an evidence-based, systematic way of connecting identified barriers to proposed solutions. This is particularly important for this project as the behavioural barriers to energy efficiency uptake in the PRS are complex. Behavioural science offers tools e.g., the <a href="Behaviour Change Wheel">Behaviour Change Wheel</a> that can connect behavioural barriers to most impactful/relevant solutions
- Work with the PRS Strategy and Engagement team to consider how new policy and legislative changes can be communicated most effectively, what the key barriers to communication are (building on stage 1) and design ways to help influence behaviour change.

Stage 3: Piloting the delivery of the amended/more flexible approach in the three wards in Hastings, aiming to improve energy efficiency and resident health in the target households.

Estimated time: Six months

#### Activities:

- Share new advice and guidance with stakeholders and support them to understand Housing Standards requirements, policy and legislative changes, the options open to

- them, and the assistance that is available to ensure dwellings meet minimum standards
- Encourage stakeholders to commit to making energy efficiency improvements
- Support the delivery of improvements in private rented accommodation
- Implement behaviour change guidance/interventions to ensure tenants utilise their energy efficient homes effectively
- Regular liaison with stakeholders to determine effectiveness of the scheme and inform analysis at stage 4
- Data gathering before and after interventions to determine impact on property energy efficiency and relevant resident-focused outcomes (e.g., energy bill reduction, selfreported thermal comfort, health & wellbeing, etc.) and to feed into the development of future policy.

# Stage 4: Evaluating the impact of the approach and capturing lessons for a more sustained programme of activity.

#### Estimated time: Two months

#### Activities:

- Analyse data gathered with central government during stage 3 to determine whether the project has had and will continue to make a significant impact on tenant health & wellbeing and building energy efficiency, and whether lessons learned are scalable or particular to the area
- Co-evaluate project outcomes against original hypotheses
- Capture lessons learned by central/local government, and tenants/landlords, to determine whether changes to implementation of current programmes should be extended beyond the lifetime of PfPP.

#### Risks and mitigations

Risk: Difficulties in securing participation from landlords and tenants during engagement stage.

Mitigation: Utilise a range of tools/channels to secure participation of stakeholders, including those not explored in previous schemes, seeking views from central government and utilising their networks. Also use behavioural expertise, potentially through the provision of behavioural science training to the local working group delivering the project or working closely with behavioural science experts, so they can produce effective comms and targeted engagement.

Risk: Lack of buy-in from stakeholders.

Mitigation: Effective communications and clear involvement of central government will add weight to the project. Central/local government partners will make assurances that genuine change can be achieved with stakeholders' input.

Risk: Delays in recruiting staff and resourcing project, leading to longer timescales.

Mitigation: Clear communication between central/local government so that preparations can commence at an early stage.

Risk: Delays in completing project stages due to additional time taken with stakeholders who have additional needs. This may increase the risk of not being able to measure outcomes at the individual level.

Mitigation: A comprehensive and thorough EQIA to identify stakeholders' needs early and tailor support accordingly.

Risk: Infrastructure required to deliver stage 3 will not be known until stage 2 co-design activity has taken place.

Mitigation: Clarity at stage 2 as to what will be required to meet expectations and the timescales around activity.

Risk: Project success will be dependent on effective co-design and will draw on several different partners, with the delivery of the project being more dependent on some partners than others. Risk of partners not agreeing on the proposed way forward.

Mitigation: External professional facilitation of co-design sessions aiming to understand different points of view, keeping in sight the agreed overall objective and seeking to achieve consensus.

Risk: Some partners do not engage in the process meaning the project fails, does not achieve its objectives, or places additional burden on remaining partners.

Mitigation: Be clear about roles and seek a commitment from all partners as regards the involvement at project outset.

Financial risk: Difficulties engaging with stakeholders in stage 1 resulting in additional resource and extended timescale, meaning slower delivery and reduced resources for further stages.

Mitigation: A clear, well-informed engagement strategy based on experience, ensuring realistic allocation of resource combined with careful monitoring.

Financial risk: Project expenditure is front loaded e.g., staff recruitment, with financial commitments being made at start of project rather than spread evenly throughout. Once incurred, these will be a sunk cost irrespective of whether future stages progress.

Mitigation: Having a comprehensive and managed risk log at project outset to identify possible points of failure and mitigate the risk of the project not progressing.

Financial risk: The capital required to fund possible subsidies or adaptations will not be forthcoming.

Mitigation: Partners to be clear at project outset what funding may be available.

### 6. Funding requirement

Please set out costed proposals for how you intend to use Partnerships for People and Place grant funding to support the activity set out in your theory of change and delivery plan.

Attached as separate document (Section 6 – PfPP funding requirement.doc)

The funding request has been developed based on our ToC and the activities outlined in the four key stages of our proposed project, as set out in the Delivery section above.

#### 7. Partnership and governance arrangements

Please set out your partnership and governance arrangements for the programme.

#### Max: 750 words, not including table and any supporting diagrams

There will be a local place working group, comprised of a Project Lead, two Senior Technical Officers, a Communications Officer, an Administration Officer, and representatives from the voluntary sector, who will be responsible for the delivery of project activity. The potential role of the energy sector in the working group will be explored in stages 1-2. This group will seek to call on local knowledge from a range of sources, including the Borough Council (which has responsibility for housing and climate change improvements in Hastings) and Public Health.

Their existing networks and relationships will prove invaluable in relation to engaging with stakeholders such as local landlords and tenants. The work funded through the programme will largely be based in existing teams and access existing networks and forums. At least one partner from the voluntary sector, which will include a representative from those organisations who provide the Warm Home Check Service, will also be a key member of the local place working group and will enable the project to access a broader section of the community, including stakeholders who may not have engaged with previous schemes. This group would be ideally placed to anticipate and identify potential barriers to delivery which could be either resolved locally or escalated to the Local Place Board.

The Local Place Board will provide strategic oversight for the project, ensuring project milestones are delivered on time and within budget. The Board will have representatives from the Borough and County Councils (including Public Health), together with a representative from the voluntary sector. The Board will also include the Finance and Data Leads (or their representatives) to ensure appropriate oversight. The Board will receive monthly highlight reports from the local place working group to inform them of progress and

ensure that key decisions and authority to incur expenditure is taken at this locally strategic level. Sitting on the Local Place Board will be the East Sussex County Council Project Liaison Manager, who will be the primary link between local government and the East Sussex PfPP lead in DLUHC. The Liaison Manager will meet regularly with their DLUHC counterpart to discuss project progress and ensure that the broader aims and ambitions of the overall programme in terms of better coordinated working between local and central government are being met, and the most is made of the overall programme. A representative from central government would also be offered a seat on the Local Place Board.

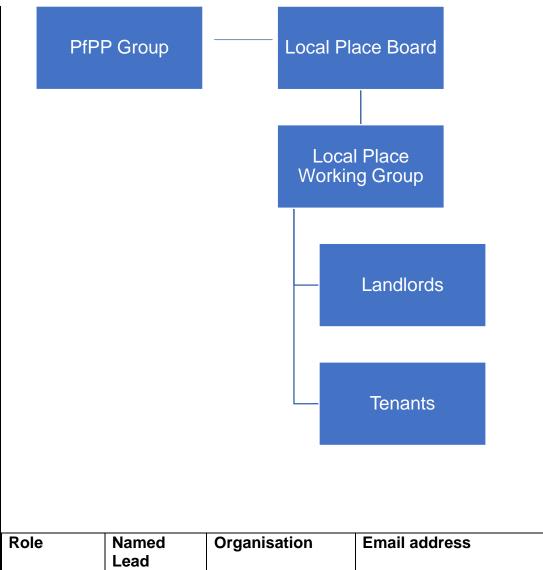
Regular project updates will be shared with the East Sussex Strategic Partnership (the county LSP) and the Hastings Local Strategic Partnership - particularly the working group for tackling health inequalities – providing opportunities for relevant partners to offer insight and expertise.

During stage 1 of the project, we will liaise with central government departments to understand what central government groups/structures we could plug into and what wider networks we can leverage to support this project. The approach that is taken would be codesigned with central government to ensure that liaison happens at the correct level, avoiding duplication and having the most impact.

This arrangement as regards the Local Place Working Group would be dynamic and kept under review as we progress through the four stages of the project, having regard to the skill sets and experience required to successfully deliver the project. However, to ensure consistency throughout the programme it is intended that the Board would remain the same.

In order to ensure that the strategic objectives of this programme in relation to strengthening partnerships within and between central and local government are achieved and sustained, there will be an overarching PfPP Group made up of the Senior Responsible Officer, the Project Liaison Manager, and representatives from DLUHC & other central government departments involved with the project. This group will meet on a quarterly basis to consider what role the central-local partnership will have beyond the lifetime of PfPP.

Proposed governance structure



Role	Named Lead	Organisation	Email address
Senior Responsible Officer	Philip Baker	East Sussex County Council	Philip.Baker@eastsussex.gov.uk
Project Lead	Harriet Judson	East Sussex County Council	Harriet.Judson@eastsussex.gov.uk
Data and Evaluation Lead	Victoria Beard	East Sussex County Council	Victoria.Beard@eastsussex.gov.uk
Finance Lead	Rachel Jarvis	East Sussex County Council	Rachel.Jarvis@eastsussex.gov.uk

# 8. Interaction with other projects and programmes

Please set out how the planned activity in your delivery plan will complement and enhance other programmes and interventions underway or planned in your area.

Max: 500 words, not including any supporting diagrams

The project will support the delivery of East Sussex County Council's <u>Climate Emergency Plan</u> and Hastings Borough Council's <u>Climate Emergency Strategy</u>. Housing is currently the greatest source of greenhouse gas emissions in Hastings, therefore action to improve energy efficiency in housing stock will play a significant role in tackling excess emissions in the borough.

Hastings Borough Council are keen to engage the local community and seek their views on the next iteration of their Climate Change Strategy using the digital community engagement platform Citizen Lab. Information about the project could be shared via the platform, allowing wider community input on its ambitions and outcomes.

The project will complement the work of the East Sussex Energy Partnership, who coordinate the countywide fuel poverty reduction programme. The programme aims to protect individuals and communities from the effects of living in a cold home. Its activities include raising awareness, training health, housing, social care and VCSE officers, and identification and referral of vulnerable people who live in a cold home. A key component of the programme is the Warm Home Check service affordable warmth scheme (a single-point of contact for health and housing referrals in East Sussex) which provides practical advice and support, arranging or signposting people to further specialist help. The Warm Home Check service is commissioned by Public Health and will be delivering LAD/HUG improvements across the county during the PfPP project period. LAD/HUG funding is available following Hastings Borough Council's successful bid to the Sustainable Warmth competition on behalf of a consortium of all local authorities in East Sussex. The project will expand the scope of the programme, with a particular focus on the PRS. The fuel poverty reduction programme will also help us to sustain the work beyond the lifetime of PfPP by using the lessons learned from the project to influence ongoing programme activity. The current Warm Home Check service contract is in place until March 2024.

The project complements the work of Minimum Energy Efficiency Standards (MEES) PRS Enforcement Project, which aims to develop and implement a formulated approach for housing standards enforcing requirements. The current MEES contract runs until March 2022, therefore PfPP is well-placed to further develop aims and utilise networks with landlords established by the MEES team.

The PfPP team will work closely with colleagues involved in the delivery of the Warm Home Check service. The project will provide opportunities for the service to test alternative ways of delivering support (e.g., flexibilities to funding of energy efficiency improvements).

Findings from the project will support the plans, including investment and actions, of the East Sussex Chief Officers Housing Group comprised of representatives from County, Borough and District Councils. Any successful interventions delivered through PfPP could be expanded to other local areas.

The project will also complement several national initiatives to improve housing standards and energy efficiency in the PRS, namely:

- The statutory fuel poverty target to ensure as many fuel poor homes in England, as reasonably practicable, achieve a minimum energy efficiency rating of band C by the end of 2030:
- The <u>Levelling Up White Paper's</u> ambition to abolish 'no fault' evictions and give all tenants a strong right to redress, and proposals for new minimum standards for rented homes.

There may be opportunities for the project to complement a planned programme to reduce health inequalities in Hastings through partnership working between London South Bank University, the Universal Healthcare Network, and the Sussex ICS. This programme will test and embed a new way of designing NHS services which seeks to achieve Universal Healthcare, and therefore reduce health inequalities.

We will also make links with other central government funded initiatives which have a focus on place-based and/or collaborative working, including <a href="Hastings Opportunity Area">Hastings Opportunity Area</a>, <a href="Changing Futures">Changing Futures</a> and <a href="Hastings Town Deal">Hastings Town Deal</a>, to build connections/relationships and share learning.

#### 9. Data

Please set out how you intend to develop the collection, sharing, analysis and use of data to drive service improvement and measure outcomes set out in your theory of change.

#### Max: 600 words

#### Target group data

As Hastings Borough Council has an Additional HMO Licensing Scheme in our three target wards, we have an awareness of where many of our rental properties are. The licence requires a person to identify themselves as the licence holder and manager for the property. Therefore, this information could be used for engagement with landlords. However, in signing up for the scheme and providing their personal details, we will need landlord's consent to pass their details on to third parties as they are only provided for the purposes of licensing. The current licensing scheme runs until May 2023 so data should remain current. This data will not include details of HMOs in the area that are made up of purely leasehold occupiers, or where the requirements to be licenced are not met.

Hastings also hold PRS data in the 2016 Housing Stock Condition Survey. Colleagues are in the process of commissioning an updated survey, which should be ready in mid-2022 when a contractor is in place. This survey will provide up to date information about the housing stock in the Hastings and St Leonards area and provide comparisons by ward.

Due to the current MEES project, Hastings Borough Council have extensive and current data about the energy efficiency ratings of properties in these target areas. In addition, data is available for properties that have improved their rating as a result of the MEES project, and those that currently remain non-compliant. We also are working with Trading Standards who enforce the regulations where there is no EPC on a property. This data is regularly updated for the duration of the MEES project.

Data sharing agreements for the use of all the above will need to be discussed and agreed with the Hastings Borough Council data protection officer prior to project commencement.

As outlined in the table below, the Warm Home Check service currently collects data on client wellbeing, satisfaction and thermal comfort, and property energy efficiency improvement. Data is collected pre and post intervention. Collection will be expanded to

include all tenants and properties involved in the pilot. All Warm Home Check staff and associated services must comply with data protection legislation and information governance requirements (e.g., GDPR and Data Protection Act 2018), as per the contract requirements. The council has completed a Data Protection Impact Assessment (DPIA) for the Warm Home Check service to ensure that the service arrangements established are GDPR compliant, and to evaluate risk levels of processes, procedures, and systems. The DPIA, client privacy notices and consent forms will be reviewed and updated to take into account the requirements of the PfPP project and ensure any new aspects are implemented.

#### Income and expenditure data

All grant funding received by East Sussex County Council, both income and its expenditure, is recorded and monitored by county council finance teams.

Table 1: short-term outcomes

Short-term Outcomes	measurement metric	Current availability (data held/data collected but not held/new data required)
Resident (tenant) wellbeing	intervention client	New data collection - routine Warm Home Check service information
Resident (tenant) wellbeing	intervention Client	New data collection - routine Warm Home Check service information
Resident (tenant) thermal comfort	Pre and post intervention client	New data collection - routine Warm Home Check service information

	using the 7 point	
	using the 7-point Bedford scale.	
Posident (tenent) estisfaction		Now data collection routing
Resident (tenant) satisfaction	percentage of	New data collection - routine Warm Home Check service information
		ļ.
External investment secured for installation of major measures		New data collection - routine Warm Home Check service information
Landlords are incentivised to invest in improved energy efficiency Increased delivery of energy efficient improvements in housing stock	households where	New data collection – through existing HUG/LAD monthly reporting
Improved tenant/landlord understanding of barriers to improve energy efficiency and ways to address barriers  Communities empowered to co-operate and influence solutions  Tenants adapt to new features in their accommodation	interviews/surveys	Tenant – new data collection from Warm Home Check Service Landlord – new data collection via Warm Home Check service and/or other means
Robust evidence to show impact of better central Government co-ordination on	Number of central government departments	New data collection

objectives supported by	attending 3 local workshops Number of central government officials engaged, and time spent co-designing flexibilities	
Shared understanding between central government and local partners of what activity can deliver improved energy efficiency, tackle fuel poverty, and improve health and wellbeing outcomes	Pre and post interviews/surveys	New data collection
Good understanding locally of integrated approach to securing housing, health, and environmental objectives in privately rented accommodation.		

# Table 2: long-term outcomes

Longer-term Outcomes	measurement metric	Current availability (data held/data collected but not held/new data required)
Property energy efficiency improvement		New data collection - routine Warm Home Check service information
Reduction in fuel consumption in the PRS housing stock	Tenant self- assessment	New data required
Increased number of tenant enquiries to the Warm Home Check Service from the three target wards	Total number of enquiries from three wards	New data required
Sustained local/central government collaboration	Local authority and central government self-assessment - survey	New data required
Improved access to examples of the impact of more flexible approach (which benefits from government insight)	Number of case studies embedded in central gov work	New data required

Surveys before and after	New data required

# Annex A: ESCC Theory of Change

Inputs	Activities	Outputs	Short-term	Long-term	Impacts	Long term
0 1 1	5		outcomes	outcomes	D "11 1	impacts
Central	Participation in	Improved	Robust evidence	Sustained cross	Possible changes	Contribution
Government level	engagement with	understanding	to show impact of	government	to approach	to national
	landlords/tenants,	within Government	better central	working enabling	nationally.	health and
Engagement in	co-design of pilot,	of barriers to action	Government co-	effective local		climate
pilot design and	and evaluation	to improve energy	ordination on the	delivery	Regular, lasting,	change
delivery from		efficiency and	delivery of energy		and effective	objectives
BEIS, DHSC,	Agree flexibilities	ways to address	efficiency/fuel		collaboration	
NHSEI and	(e.g., in relation to	these barriers	poverty/health		between central	
DLUHC	funding) to enable		objectives		government to	
	action to improve	Evidence of impact	supported by		enable local	
Links into central	energy efficiency (for	of collaboration at	effective cross		solutions	
government	PfPP pilot)	central and local	government			
groups/networks		levels, e.g.,	working (e.g., an			
	Ongoing evaluation	flexibilities are	increase in the			
PfPP Funding	activity to capture	agreed	number of			
	learning throughout		premises in which			
Dedicated	the project		work is carried			
DLUHC contact			out)			
to work in close						
partnership and						
escalate issues to						
central						
government						
department						
partners						
Dedicated						
DLUHC team to						
coordinate						
funding mapping						

exercise and evaluation  Access to an expert place working group to test ideas and seek advice in an informal environment						
Experience of activity to improve energy efficiency, tackle fuel poverty and improve health and wellbeing to date  Experience of working with local landlords and tenants and knowledge of the local area  Collaboration between East Sussex CC, Hastings BC, voluntary organisations,	Engagement and consultation with landlords and tenants (supported by communications strategy)  Design awareness/behaviour change support for tenants  Co-designing flexibilities with central government colleagues, in funding and support for landlords and tenants.  Promotion and delivery of programme through ES Warm Home	Understanding of barriers to action to improve energy efficiency and action to address these barriers  Co-designed flexibilities, with central government colleagues, in funding and support for landlords and tenants  Delivery of action to improve energy efficiency of accommodation, including at least one HMO with multiple ownership	Shared understanding between central government and local partners of what activity can deliver improved energy efficiency, tackle fuel poverty, and improve health and wellbeing outcomes  Good understanding locally of integrated approach to securing housing, health, and environmental objectives in	Improved access to examples of the impact of more flexible approach (which benefits from government insight)  Sustained national and local programmes to improve energy efficiency of private rented accommodation.	East Sussex and Hastings better supported by central government to deliver local interventions  More collaborative working between East Sussex CC, Hastings BC and local partners  Lessons from project fed into programme evaluation & learning embedded across central and local government.	Contribution to national health and climate change objectives

and other partners  Opportunities for peer connections with other pilot places	Check service – existing scheme which offers holistic guidance to residents experiencing, or at risk of experiencing, fuel poverty  Ongoing evaluation activity to capture learning throughout the project  Ongoing funding mapping activity	New/enhanced governance and delivery structures Final funding mapping output	privately rented accommodation			
Person-level - landlords  Local knowledge of targeted outcomes, barriers, and potential solutions	Participation in consultation and engagement activities  Engagement with delivery of improvements to property	Understanding of impact of current rules, advice, and guidance  More landlords invest in improved energy efficiency	Landlords are incentivised to invest in improved energy efficiency - Increased delivery of energy efficient improvements in housing stock	Improved energy efficiency in private rented accommodation	More landlords and tenants actively support and invest in improved energy efficiency	Contribution to Net Zero
Personal level – tenants  Local knowledge of targeted outcomes	Participation in consultation and engagement activities  Engagement with delivery of improvements to property	Tenants understand how to adapt to new features (e.g., heating system or ventilation) Understanding of impact of current	Communities empowered to co- operate and influence solutions  Tenants adapt to new features in their accommodation	Reduced fuel consumption  Improvement in tenant wellbeing, thermal comfort, and satisfaction	Less fuel poverty. Improved health and wellbeing  More tenants actively seek investment in improved energy efficiency	Improved health and wellbeing Contribution to Net Zero

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rules, advice, and guidance		

Key assumptions	Government willingness to agree flexibilities to be piloted in Hastings. Sufficient engagement from tenants and landlords.
External factors	Cost of the improvements (particularly in poorly converted premises in conservation areas). The challenge of contacting "absentee" landlords.  Availability of local supply chain for provision of renewable technologies.
Unintended	The impact of either enforcement or investment in premises on the private rented stock.
consequences	How households respond to improvements in energy efficiency.

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## **APPENDIX 2 - Proposed Partnerships for People and Place governance structure**

### **PfPP Group**

Assistant Chief Executive, ESCC
Executive Support Manager, ESCC
PfPP lead for East Sussex, DLUHC
Other central government representatives (TBC)

### **Local Place Board**

Assistant Chief Executive, ESCC
Assistant Director, People, Places & Communities,
DLUHC

Executive Support Manager, ESCC
Head of Finance (Planning and Reporting), ESCC
Head of Performance, Research and Intelligence,
ESCC
Health Improvement Principal (Communities and

Settings), ESCC

Other central government representative, BEIS (TBC)

PfPP Policy Lead, DLUHC

# **Local Place Working Group**

CA1066 Project Team
Executive Support Manager, ESCC
Health Improvement Principal (Communities and Settings), ESCC
Retrofit Works representative (TBC)

---- Landlords

**Tenants** 

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