

**LOCAL GOVERNMENT NATIONAL INDICATOR SET TECHNICAL HANDBOOK - RESPONSE TO CONSULTATION DOCUMENT**

**Name and address of responding organisation:**

**NEA, St.Andrews House, 90-92 Pilgrim St, Newcastle Upon Tyne, NE1 6SG**

**Is this your organisation's official response to the consultation? Yes**

**Name and phone number of key contact in case of follow-up queries:**

**Peter Sumbly, Director of Operations, NEA. Tel: 0191 261 5677**

**National Indicator Number:**

**187**

***Please complete a separate form for each indicator on which you wish to respond***

Indicator Issue	
<b>1. Is the Technical Definition of this indicator clear?</b>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
<p>If NO</p> <p>a. What aspects of the technical definition of the indicator are unclear? Please specify clearly</p> <ul style="list-style-type: none"> <li>- is it in relation to the measurement method, or</li> <li>- on reporting</li> </ul> <p>b. Please suggest how the template can be clarified/improved.</p>	<p><b>(a) NEA assumes that SAP 30 has been adopted as a fuel poverty proxy in order to target those homes rated as most hazardous to health as defined by HHSRS. However as HHSRS indicates homes at SAP 35 as being Category 1 hazards, the relationship between SAP 2001 and SAP 2005 needs to be clarified in order to justify the adoption of this target and avoid confusion. Guidance is also required as to the appropriate level of accuracy required in calculating SAP ratings as the cost/resource implications of different methods will vary considerably. NEA's</b></p>

	<p>concern is that NI187 should be seen to drive practical action to tackle fuel poverty and not to add onerous or costly data collection and reporting responsibilities. (b) Whilst NEA welcomes the intention behind NI187 to target action at the least energy efficient homes occupied by householders on the lowest incomes, we remain concerned that as currently defined the indicator will fail to drive appropriate action or measure significant progress toward meeting UK Fuel Poverty Strategy targets. NEA's initial calculations suggest that whilst 97% of households below SAP 30 and claiming income-related benefits will be fuel poor, this represents only 20% of fuel-poor households. As currently defined, the methodology will neither encourage nor measure progress to tackle fuel poverty amongst the majority of households in local authority areas. The indicator would have been significantly improved by adopting a SAP target as a proxy for affordable warmth (SAP 65) in addition to SAP 30.</p>
<p><b>2. Does the Technical Definition for this indicator have any unintended consequences?</b></p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
<p>If YES a. What are the unintended consequences on this national indicator?</p>	<p><b>(a) The indicator seeks to measure action to tackle</b></p>

<p>b. Can the unintended consequence be avoided? If so, how?</p>	<p><b>fuel poverty but as currently defined will only be targeted at 10.2% of the housing stock / 20% of fuel-poor households. As such the methodology will fail to adequately meet the requirements of the UK Fuel Poverty Strategy.</b></p> <p><b>In addition, there is a danger that the indicator will have the consequence of channeling stretched resources into data collection and reporting and away from practical action. Local Authorities report a likely cost of £100 per household to carry out an enhanced Level 0 survey. For many authorities, such a cost applied to the required data sample of 1% of homes will undoubtedly detract from resources currently put into measures and co-ordination.</b></p> <p><b>(b)NEA's preference would be for the methodology to be refined by adoption of a aspirational proxy for affordable warmth (SAP 65) in addition to a "floor" indicator designed to tackle Category 1 hazard properties (SAP 30/35).</b></p>
<p><b>3. Will the Technical Definitions for this indicator work in practice?</b></p>	<p>Yes <input type="checkbox"/>                      No <input checked="" type="checkbox"/></p>
<p>If NO a. Why would this technical definition not work in practice?</p>	<p>NEA's view is that the technical definition is flawed in that it has adopted a</p>

	<p>proxy for fuel poverty that excludes the majority of low-income and vulnerable householders. Whilst a focus on households likely to be experiencing the most severe case of fuel poverty is to be welcomed as part of co-ordinated action to tackle fuel poverty, it is unlikely that the requirement to collect the data needed to report against this indicator will produce meaningful results in support of overall UK Fuel Poverty Strategy objectives.</p>
<p><b>4. Is this indicator defined at the right spatial level?</b></p>	<p><b>Yes</b> <input type="checkbox"/>      <b>No</b> <input checked="" type="checkbox"/></p>
<p>a) If not, what level should it be defined at? (including whether information is already gathered and/or reported at that level and if so where, if not, estimated cost of collecting and reporting it)</p>	<p>NEA's concern is that any additional reporting burden placed upon LAs should not be at the expense of hard measures, practical action and local co ordination activity. NEA's local authority membership has already expressed concerns as to the likely cost implications of annual surveys as outlined in the methodology, and NEA shares the view that all options to look at national or shared alternatives to the provision of data should be explored first (e.g. HEED, extended EHCS)</p>

<p><b>5. Should data for this indicator be provided for any or all of the different equalities strands (please tick the relevant box)?</b></p>	<p>Ethnicity <input type="checkbox"/></p> <p>Gender <input type="checkbox"/></p> <p>Religion <input type="checkbox"/></p> <p>Age <input type="checkbox"/></p> <p>Sexual orientation <input type="checkbox"/></p> <p>Disability <input type="checkbox"/></p> <p>Other <input type="checkbox"/> (Please specify)</p>
<p>a) For any boxes ticked at 5, is this information already gathered and/or reported and, if so, where? If not, what would be the estimated additional burden of collecting and reporting it?</p>	
<p><b>6. Further comments on the questions above and /or any other comments that are not covered above questions.</b></p>	
<p>Completed versions can be sent to <a href="mailto:niconsultation@communities.gsi.gov.uk">niconsultation@communities.gsi.gov.uk</a>. Hard copy responses should be returned to Local Government Quality and Performance Division, Zone J2, 4<sup>th</sup> Floor, Eland House, Bressenden Place, LONDON, SW1E 5DU.</p>	