

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

Name and address of responding organisation:
Devon County Council

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

Name and phone number of key contact in case of follow-up queries:
Ian Bateman 01392 383390

National Indicator Number:

187

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

Indicator Issue	
1. Is the Technical Definition of this indicator clear?	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"> - is it in relation to the measurement method, or - on reporting <p>b. Please suggest how the template can be clarified/improved.</p>	<p>See comments at para 6. It is not clear if this indicator requires an annual SAP survey of each of the homes identified in the random sample in order to compile the data. If so it is a non-starter as this is a huge task.</p>
2. Does the Technical Definition for this indicator have any unintended consequences?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
<p>If YES</p> <p>a. What are the unintended consequences on this national indicator?</p> <p>b. Can the unintended consequence be avoided? If so, how?</p>	<p>This is a proxy measure to arrive at an indicator and assumes that the output is a measure that in some way relates to energy efficiency. Whilst this may be true in some cases the proper definition of fuel poverty may also be affected by</p>

	<p>fuel prices and the state of employment in the economy. LAs can install as many energy efficient solutions as they like but in a low wage region if fuel prices are rising and the economy moves into recession creating unemployment, real fuel poverty will rise.</p>
<p>3. Will the Technical Definitions for this indicator work in practice?</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>What is the purpose? To tackle fuel poverty or create an indicator. The indicator should be a measure of what has been done in terms of the number and type of installations made.</p>
<p>4. Is this indicator defined at the right spatial level?</p>	<p>Yes <input checked="" type="checkbox"/> No <input 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>5. Should data for this indicator be provided for any or all of the different equalities strands (please tick the relevant box)?</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>

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?

6. Further comments on the questions above and /or any other comments that are not covered above questions.

1. Whilst this indicator has not been allocated to the County Council level, the proposal seems unduly cumbersome. It uses a proxy measure of people on benefits in low SAP rated homes. The SAP rating used falls in the middle of the SAP F band which seems perverse. It is not clear how the survey process will work (i.e. the survey of both homes and people on income based benefits). Moreover, the SAP inspection seems to be a very detailed and lengthy process if it is to be done from scratch on a completely random sample of homes occupied by people on benefits. What about the people in fuel poverty that are not on benefits? It is suspected that this is just a desk top exercise to produce an indicator for measuring trends and bears no relationship to work needed to identify individuals in fuel poverty and to provide solutions to get them out of that position. Given that benefit recipients may already live in a Decent Home, the answer may be an economic one (return to work) rather than one concerned with energy efficiency.

2. The indicator takes no account of the Fuel Poverty Indicator (FPI) produced by the Centre for Sustainable Energy and Townsend Centre for International Poverty Research at the University of Bristol – a project sponsored by the former Department of Trade and Industry and Department of Health. Maps are already available for the English Regions and counties. The accompanying data is also available to ward level at <http://www.fuelpovertyindicator.org.uk/>.

Completed versions can be sent to niconsultation@communities.gsi.gov.uk. Hard copy responses should be returned to Local Government Quality and Performance Division, Zone J2, 4th Floor, Eland House, Bressenden Place, LONDON, SW1E 5DU.