

## Slough Borough Council

<b>Report To:</b>	<b>Cabinet</b>
<b>Date:</b>	21 <sup>st</sup> July 2025
<b>Subject:</b>	Warm Homes Local Grant Programme
<b>Lead Member:</b>	Councillor Ishrat Shah – Equalities & Public Health Councillor Robert Stedmond – Housing, Temporary Accommodation & Estate Renewal
<b>Chief Officer:</b>	Tessa Lindfield – Director of Public Health & Public Protection Pat Hayes, Director of Regeneration Housing & Environment
<b>Contact Officer:</b>	Jason Newman – Group Manager Carbon & Sustainability
<b>Ward(s):</b>	ALL
<b>Key Decision:</b>	YES
<b>Exempt:</b>	NO
<b>Decision Subject To Call In:</b>	YES
<b>Appendices:</b>	Appendix 1 – Resident Engagement Strategy Appendix 2 – Project Gantt Chart Appendix 3 – PAS Process Diagram Appendix 4 – HEAT tool Appendix 5 – Equality Impact Assessment

### 1. Summary and Recommendations

- 1.1** This report sets out to share information and gain endorsement of the Warm Homes Local Grant programme jointly led by Regeneration, Housing, and Environment and Public Health and Public Protection Directorates. It is a UK government-funded scheme that helps low-income homeowners and private tenants in England improve the energy efficiency of their homes.
- 1.2** Cabinet is recommended to:
- To note the award of £1.5m in Warm Homes: Local Grant (WH:LG) from the Department for Energy Security and Net Zero (DESNZ) and approve the programme delivery outlined in this report.
  - Commit to co-funding the scheme, alongside funding allocated by DESNZ, using resource from the public health budget totalling £200,000 over three years.
  - Delegate authority to the Director of Public Health, in consultation with the Lead Member for Equalities and Public Health, to procure, award and enter into the contract with a delivery partner over an initial contract period of 3 years + 2 years extension.

- d) Approve the addition of £1.275m Warm Homes Funding onto the Capital Programme

### 1.3 Reason:

Agreement to these recommendations will enable the Council to proceed with the programme, complete the successful procurement of a delivery partner and meet the Government Delivery Assurance Check obligations to deliver the programme as well as ensuring the successful mobilisation of the programme, and that it is adequately resourced.

### Commissioner Review

This report is outside the scope for pre-publication commissioner review; please check the [Commissioners' instruction 5 to CLT to sign off papers](#) for further details.

### 1.4 Introductory paragraph

The WH:LG programme meets Slough Borough Council's corporate priorities to create:

- A town where residents can live healthier, safer and more independent lives – the WH:LG programme will address health inequalities in Slough by targeting those who live in private housing within the most deprived areas of the borough.
- A town that is cleaner, healthier, and more prosperous – the WH:LG programme brings opportunities to improve low quality private housing including the private rented sector, which will lead to health improvements for residents living within such properties. Energy efficiency and low carbon heating measures implemented as part of the programme will also directly influence carbon emissions and thus improve the environment for all residents in Slough.

### 1.5 Options considered

Option 1 – Recommended

Approve the programme and approach outlined within this report, which will allow the Warm Homes Local Grant project team to progress with the delivery of the scheme.

Option 2 – Not Recommended

Do not approve the approach outlined within this report. This is not recommended, as the Council would miss out on an opportunity to improve the energy efficiency of homes and increase low carbon heating installations for low-income households.

## 2. Background

### 2.1 Government Manifesto

- 2.1.1 The Government committed to a Warm Homes Plan to upgrade five million homes over the next five years to cut bills for families and deliver warmer homes to slash fuel poverty. This ambition is a key part of the Government's 'second mission' to transform Britain into a clean energy superpower, including providing the country

with clean energy from 2030, reducing bills, and transitioning homes to clean heat as part of a wider ambition to reach net zero by 2050.

2.1.2 As a key part of the Warm Homes Plan, the Government has committed to partnering with combined authorities, local and devolved governments to deliver this ambition. The Warm Homes Local Grant scheme is the first step to delivering on the Warm Homes Plan, targeting low-income households living in the worst quality, privately owned homes in England. The Warm Homes Scheme therefore represents an opportunity to address fuel poverty and improve the quality of life for vulnerable households in Slough.

2.1.3 The average EPC rating for existing homes in the UK is D. The UK housing stock requires significant investment to improve energy efficiency and the UK lags most European countries when it comes to heat loss from homes. The estimated average cost to improve dwellings to at least an energy efficiency band C was £7,320 across all tenures, with owner occupied dwellings costing the most and social rented homes costing the least<sup>1</sup>. Slough has a high number of private rented households more than 40% who may benefit from this scheme.

## **2.2** Scheme Details

2.2.1 The WH:LG provides energy performance upgrades and low carbon heating to households that meet the following criteria:

- i. Households are owner-occupiers or private renters. Landlords can apply for funding to reduce bills for tenants and can receive full funding for first property and 50% for additional properties.
- ii. Households have an Energy Performance Certificate (EPC) between D and G.
- iii. The household has an annual gross income below £36,000; OR receives specified means tested benefits; OR is in an area of deprivation (Index of Multiple Deprivation income deciles 1-2).

2.2.2 Unlike the previous Government scheme (Home Upgrade Grant), these upgrades are open to all fuel types, including on gas households (those heated by mains gas), and off gas households (those heated by electricity, oil, coal, or liquid petroleum gas).

2.2.3 The scheme will fund energy performance upgrades, including wall insulation and other types of insulation, double glazing, solar panels, batteries, and low carbon heating systems (including heat pumps, high retention storage heaters, and solid biomass – although the latter is only to be installed in exceptional circumstances, with heat pump installation being the priority).

2.2.4 Price limits for measures are given where value for money is sensitive to the price of installation (e.g. external and internal wall insulation, double/triple glazing, park home insulation, solar thermal). All upgrades are required to adhere to the latest standards, namely PAS 2030/2035:2023 Retrofit Standards Framework and must be lodged under the TrustMark registration and MCS certification schemes. There are requirements to produce an airtightness strategy for some fabric projects, which may include setting of airtightness targets and air leakage testing. There is an overall requirement to ensure there is adequate ventilation within the dwelling to

---

<sup>1</sup> English Housing Survey 2023 to 2024: headline findings on housing quality and energy efficiency - GOV.UK.

control moisture and ensure that unintended consequences such as damp and mould do not occur.

#### 2.2.5 The scheme will bring the following benefits:

- i. Addressing private sector homes that need improvements for heating, ventilation, insulation, and fuel poverty by improving energy efficiency and reducing bills.
- ii. Reducing cold-related illnesses such as hypothermia, respiratory disease, and cardiovascular problems.
- iii. Lowering the carbon footprint of households in Slough through energy-efficient homes by promoting low-carbon heating and energy-efficient upgrades.
- iv. Reducing the long-term energy bills for vulnerable households, helping to free up income for other essential needs.
- v. Addressing inequality by improving living conditions for those most at risk, ensuring all households can afford to stay warm and safe in their homes

#### 2.2.6 The scheme will achieve the following outcomes, many of which will be used as Key Performance Indicators (KPIs) of the project:

- i. reductions in energy use
- ii. reductions in energy costs and/or alleviation of fuel poverty
- iii. reductions in emissions associated with energy use
- iv. improvement in internal comfort
- v. improvement of IAQ (internal air quality)
- vi. reduction of condensation, damp and mould
- vii. reducing the risk of overheating
- viii. improvement in energy rating (e.g. SAP)
- ix. improving the usefulness or sustainability of the building
- x. improving the management of moisture within the building

### 2.3 Slough Situation

2.3.1 Slough is more deprived than the England average on the 2019 Index of Multiple Deprivation (IMD). 71% of Slough's Lower-tier Super Output Areas (LSOAs) fall below the national average of the IMD, with particularly severe pockets in Britwell, Chalvey, Herschel Park, Elliman, Wexham Court, and Colnbrook with Poyle. 30,240 households in Slough (57.7%) are deprived in one or more dimension (compared to 51.6% in England<sup>2</sup>).

2.3.2 The quality of housing in Slough is poor, with many neighbourhoods with pre-1945 terraces and 1970s estates having homes with low insulation and high heat loss. Slough is more deprived than the England average for living environment (e.g., condition of home, air quality) and overcrowding.

2.3.3 In 2022, 12% of Slough households were classed as fuel poor (compared with 10% in England)<sup>3</sup>, spending over 10% of income just to heat a cold home. Rising energy prices have pushed more families and older residents into "heat or eat" choices, leaving homes under-heated through deep winter. Slough's average December–February indoor temperature (unheated) hovers between 4°C and 10°C, well below the World Health Organisations (WHO) 18°C minimum recommendation.

---

<sup>2</sup> Households by deprivation dimensions - Office for National Statistics

<sup>3</sup> Department for Business, Energy & Industrial Strategy, Sub-regional Fuel Poverty Statistics (2022)

2.3.4 The healthy life expectancy for residents in Slough is much lower than both the average for the Southeast and neighbouring authorities. Cold homes can exacerbate this, as living in temperatures below 18°C increases airway inflammation, lowers lung function and makes it harder to clear viruses and bacteria from the respiratory tract. Colder indoor air spikes asthma attacks, COPD flares and chest infections – every 1°C drop below 18°C correlates with an 8 % rise in winter hospital admissions for respiratory conditions. Older people have reduced immunity and are more prone to pneumonia and bronchitis in cold housing, whilst young children are at risk of childhood asthma as their lungs are still developing.

2.3.5 This scheme therefore has the potential to contribute towards improving some of these issues, by improving the quality of housing and the health of residents in Slough, and whilst also reducing the financial burden on residents.

2.3.6 The map below (Figure 1) identifies all of the households that reside within the Index of Multiple Deprivation income deciles 1-2, which totals at 2,614 households. Of these, 957 (around 37%) have an EPC rating below C and would be eligible for the scheme.

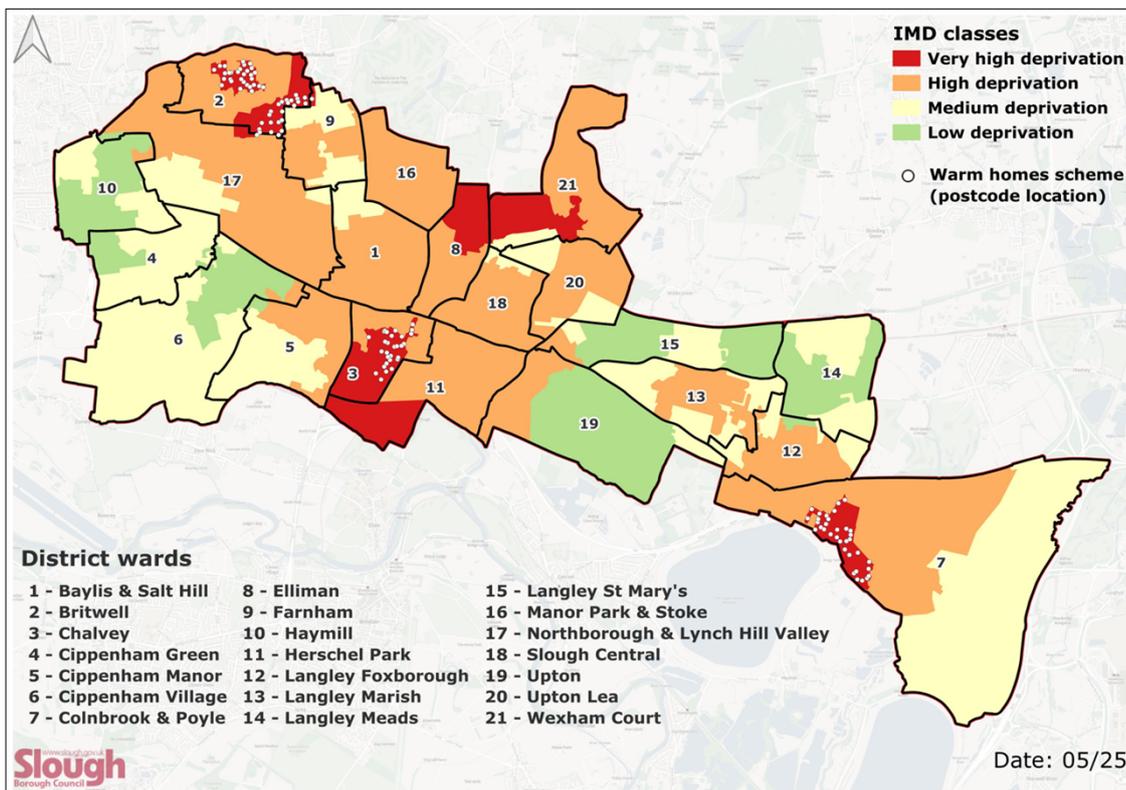


Figure 1: Map showing IMD classes and location of automatically eligible households

## 2.4 Delivery Approach and Resident Engagement

2.4.1 Due to the funding limitations, the total number of households that can be retrofitted under the scheme is approximately 50-100, which is a significantly smaller portion than originally anticipated. As such, a prioritisation approach is being developed which identifies which of the 957 identified eligible households are likely to be retrofitted first.

2.4.2 Table 1 below presents the quantity of households that fall into the ECP categories from ECP D to ECP G<sup>4</sup>. To refine this further, public health data will be overlaid to identify those who are suffering from poor health (for example respiratory or cardiovascular illnesses), or are considered particularly vulnerable. This will allow the scheme to target those who are most in need of support.

*Table 1: Number of properties within each ECP band from ECP D to ECP G, including those with no rating.*

ECP Rating	Property Count
D	723
E	210
F	19
G	5
No rating data	703
Total	957

2.4.3 It should be noted that there are a significant number of households which have no current ECP rating and as such, there may be households within this category that will also be eligible for the scheme. Additionally, households which do not fall within IMD areas 1-2 may still be eligible for the scheme based on their income meeting required eligibility criteria. As such, the scheme will be promoted publicly by the Council to allow residents who do not fall within the aforementioned targeted households to apply for the scheme, whilst also improving awareness of this initiative across the borough, and reassuring residents of its validity.

2.4.4 A resident engagement plan has been developed which outlines how the scheme will be communicated to the public and the different methods in which this will be undertaken – see Appendix 1. Resident engagement is intended to be addressed collaboratively with support from the delivery partner.

## 2.5 Programme Development

2.5.1 The WH:LG scheme uses a model with distinct stages (see Figure 2):

- i. **Expression of Interest:** In December 2024, Slough Borough Council submitted an Expression of Interest (EOI) to the Department of Energy Security and Net Zero (DESNZ) upon announcement of the Warm Homes Local Grant scheme. Although the Council had applied for £4.807 million worth of funding, the Council were awarded £1.5 million, to be spent over the next three years starting from April 2025 and ending in March 2028 (see Section 3.1 for further details).
- ii. **Mid-Mobilisation Review:** Following funding allocation, grant recipients are provided an opportunity to receive early feedback on the documents that are required in order to pass the upcoming Delivery Assurance Check, and provide

<sup>4</sup> Energy Performance of Buildings Data England and Wales

DESNZ with an update on procurement timescales and resourcing progress. DESNZ have procured an organisation called Turner and Townsend to operate the Retrofit Information Support and Expertise (RISE) service to undertake this function for grant recipients, who will advise on readiness for delivery and where further development in certain areas is needed. This step is mandatory to allow the project to progress.

- iii. **Delivery Assurance Check:** The Delivery Assurance Check (DAC) will check that grant recipients have procured and resourced appropriately, and that the required documents meet the minimum standards for successful delivery. This includes documents on fraud and error risk management, household eligibility verification, and delivery forecasts. This step is mandatory to allow grant recipients to progress onto their delivery phase.

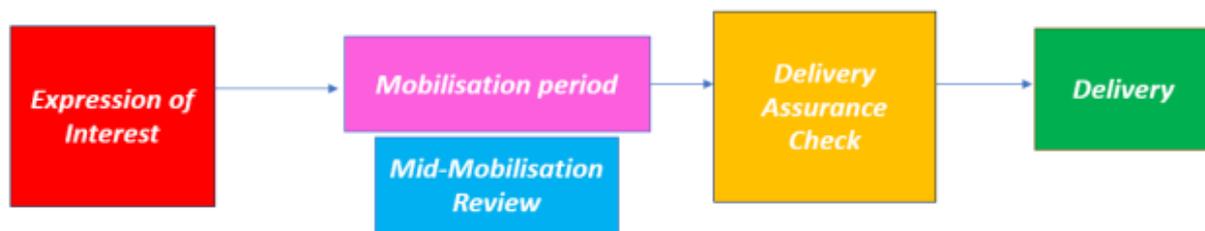


Figure 2: Stages prescribed by DESNZ for WH:LG delivery

2.5.2 These stages and how they interact with internal processes at the Council have been collated into a programme plan, which will be used to monitor progress. A condensed version has been provided within this report which illustrates the different stages of mobilisation and key milestones that need to be met (see Appendix 2).

## 2.6 Resource

2.6.1 Upon award of the contract, a WH:LG project team was assembled to lead on project initiation and mobilisation. To enable successful delivery of the scheme, the WH:LG project team are looking to procure a delivery partner, who will offer a turnkey solution to retrofitting, and will be responsible for surveying homes, designing energy efficiency measures packages, and arranging installation of those measures. Whilst the level of funding is currently £1.275m, the Government has already indicated that there may be additional grant awarded in the near future. The Council originally bid for a higher sum and would like to attract a delivery partner who has the capacity to scale up operations if future funding is available. For this reason the procurement will be based on a total contract value of £5m, making clear the current timescale and level of funding. If officers are able to secure additional funding, authority will be sought to exercise any extension / increase in funding for the contract.

2.6.2 To allow for continued oversight of the programme over the contract period, two additional posts are proposed to be created. These roles include:

- i. Project Manager: responsible for managing the delivery partner contract, checking quality of works (PAS accredited) and managing the measures batching and lodgement process

- ii. Project Officer: responsible for engaging with residents, checking and confirming eligibility and maintaining high retention rates, whilst providing support to the Project Manager and completing monthly reporting to DESNZ.

2.6.3 Figure 3 below illustrates the current (light blue) and proposed (yellow) future reporting structure for the project team. This project is being delivered across two council departments (Public Health, and Carbon & Sustainability) having common service priorities regarding resident health and decarbonisation. The Director of Public Health is the SRO and has overall ownership of the programme. The project lead is the GM of Carbon and Sustainability, reporting on progress quarterly to the SRO and DLT Public Health and Public Protection.

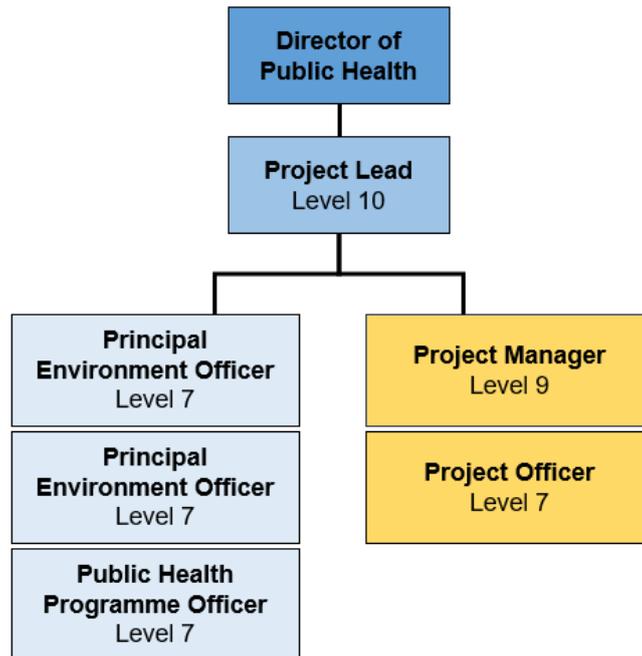


Figure 3: Diagram of project roles and reporting structure

2.6.4 The diagram below (Figure 4) outlines how the new project roles, existing project team, delivery partner and customer all interact throughout the different phases of project delivery. The section highlighted by the red rectangle is expanded further within Appendix 3.

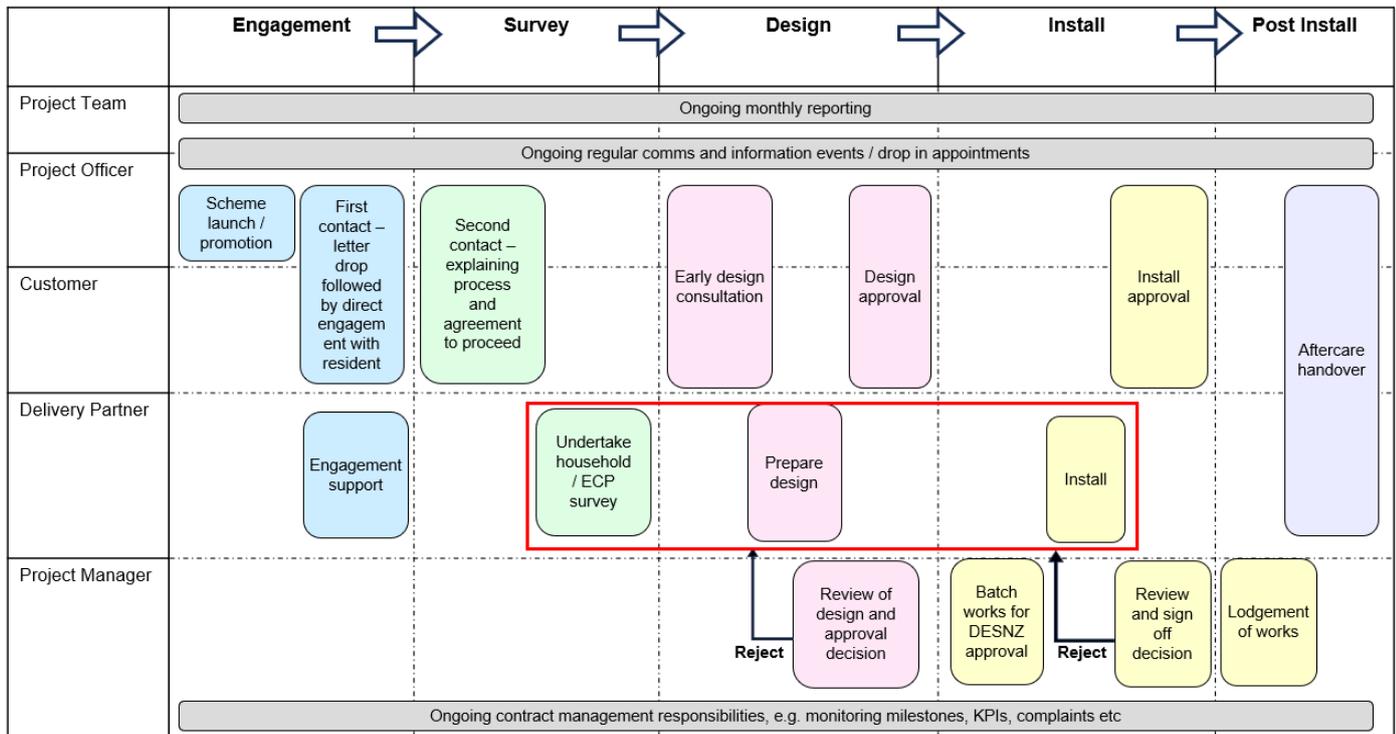


Figure 4: Interactions between stakeholders during project

## 2.7 Data Protection

2.7.1 As the project involves direct communication with residents and assessment of household and property eligibility, data processing is inherent within the project. Currently there are expected to be three different parties involved in data processing:

- i. **Data sharing with DESNZ:** Upon award of the scheme, the WH:LG project team were provided with a suite of documents to enable mobilisation of the project. This included two separate Data Sharing Agreements (DSAs) which enables sharing of data between Slough Borough Council and DESNZ. Both DSAs were reviewed by the Council's Data Protection Officer and presented to the IGG Board. No issues were raised and the DSAs were subsequently signed.
- ii. **Internal processing of data:** This will be required during eligibility checks and contacting residents when progressing with measure installation. At this stage, the exact details of the manner of this data processing have not yet been confirmed. Before project initiation, a Data Protection Impact Assessment (DPIA) will be developed and submitted to the IGG Board for approval and the project will not commence until the Board is satisfied that data processing will be adequately controlled.
- iii. **Third party data processing:** it is anticipated that some elements of data processing will be undertaken by the appointed delivery partner, and as such, provision of data sharing policies held by the appointed organisation will be required at tender submission stage and considered as part of the tender evaluation. This will also be presented as part of the DPIA.

### 3. Implications of the Recommendation

#### 3.1 Financial implications

- 3.1.1 The council have been awarded £1.5 million to deliver the WH:LG scheme. The funding allocation is significantly lower than requested at the EOI stage. The EOIs across all Local Authorities for the WHLG scheme totalled £2.1 billion for a funding pot of £500m. This meant a maximum funding allocation of £1.5m for lead authorities could be awarded, and £0.75m for partner authorities (those who are part of a consortium).
- 3.1.2 DESNZ confirmed funding requests were first scaled down based on Grant Recipient's past performance, using their best previous delivery over a six-month period. Allocations were then scaled down proportionately to meet the total available funding, subject to a minimum floor for projects and individual local authorities, to ensure projects' viability. .
- 3.1.3 The allocated spend each year for the duration of the project is outlined in Table 2 below.

Table 2: Grant allocation summary for Slough Borough Council

	1. Grant Allocation Requested in Eol	2. Scaling based on past performance	3. Final Allocation post scaling (in principle)
Total across whole Funding Period	£4,807,366	£4,807,366	<b>£1,500,000</b>
FY 25/26	£121,624	£121,624	<b>£37,950</b>
FY 26/27	£2,342,871	£2,342,871	<b>£731,025</b>
FY 27/28	£2,342,871	£2,342,871	<b>£731,025</b>

- 3.1.4 The total allocation is split between capital (85%) and revenue (15%). The reduced funding therefore presents a significant financial risk to the authority to deliver the scheme, as the revenue allocation of 15% has reduced from £720,000 to £225,000, therefore funding to support mobilisation such as procurement, marketing, salary and overheads, is limited and it is anticipated that further funding will be required to support the scheme.
- 3.1.5 Due to the anticipated positive impact this scheme will have on the health and wellbeing of Slough residents,. It is currently estimated that a total of £200,000 will be required from the public health budget over three years to support the project. Table 3 below shows the breakdown of funding allocation across capital and revenue grant expenditure and Public Health grant allocation to support officer resources to delivery Warm Homes.

Table 3: Funding allocation Capital and Revenue over 3 years

Type of contract	Contract total cost	Annual 25/26	Annual 26/27	Annual 27/28	Term
New contract Delivery Partner Capital Delivery	£1,275,000	£1,897	£674,000	£675,000	3 years
New contract Delivery Partner Administration and Ancillary Costs Revenue	£75,000	£0	£37,500	£37,500	3 years
Administration and Ancillary costs Revenue	£150,000	£36,053	£56,974	£56,973	3 years
Staffing costs – Public Health Revenue	£200,000	£40,000	£80,000	£80,000	3 years

3.1.6 DESNZ have communicated that should the council be successful in delivering the scheme, further funding will be made available. It is therefore imperative that the council provide support to enable successful launch and delivery of the scheme, to allow for further funding to come forward in future. It is therefore imperative that the council provide support to enable successful launch and delivery of the scheme, to allow for further funding to come forward in future.

3.1.7 In terms of financial management of the grant for the duration of the project, this is tightly controlled by DESNZ via a batching system. At the start of each financial year (FY25/26, FY26/27, FY27/28), 20% of funds will be given as an upfront payment, comprised of two parts: up to 15% of the Administration and Ancillary (A&A) and up to 5% Upfront Capital Payment. The remaining funds will be drawn down in batches and paid out, subject to delivery performance compared to performance indicators and conditions specified in the MoU. This element of financial management is therefore the responsibility of DESNZ. The council will however be responsible for ensuring compliance with cost caps, measure grades and measure prices. The cost cap is the maximum funding each property may receive, which is as follows:

- £15,000 per home for energy performance upgrades, including fabric measures e.g. insulation, double glazing etc, and smart measures e.g. photovoltaic (PV), smart controls, and battery storage.
- £15,000 per home for low carbon heating, including heat pumps and high retention storage heaters.

3.1.8 These costs are averaged across the project and must be met by project closure. This will be monitored throughout the project by the WH:LG project team via online portal with monthly reporting of project statistics to DESNZ.

## **3.2 *Legal implications***

3.2.1 The scheme involves collecting personal data from applicants, and it must comply with data protection laws, including GDPR. The scheme will be subject to monitoring and evaluation, and the data collected will need to be managed in accordance with data protection laws.

3.2.2 The eligibility criteria for the grant, including income thresholds, must be clearly defined and consistently applied, with due regard for those with protected characteristics.

3.2.3 When procuring a delivery partner, funding decisions must be made fairly and transparently, following the guidance provided by the Department for Energy Security and Net Zero (DESNZ). The scheme requires careful financial management to ensure that funds are spent efficiently and in accordance with the Memorandum of Understanding. The Council must comply with the Procurement Act 2023 and its own contract procedure rules in relation to procurement and award of contract. The recommendation is to delegate authority to procurement and award a contract to the relevant Executive Director. It is intended that the procurement is run on the basis of a maximum contract award of £5m, but clearly setting out the current funding parameter and that any increase in work will require a formal extension / change control mechanism to be affected. Due to the difference in value, such a decision can only be made with Cabinet authority. This can be achieved either via cabinet approving an updated Capital Strategy including the additional grant or via a stand alone cabinet report seeking authority as part of a wider update on the programme.

3.2.4 The scheme must adhere to the Public Sector Equality Duty, ensuring that decisions are made without discrimination and that opportunities are advanced for individuals with protected characteristics (race, disability, sex, age, etc.) enforced by the Equality Act 2010.

3.2.5 Guidance stipulates that Grant Recipients must have robust fraud and error risk management systems in place to protect public funds. This will be required as part of the DAC and therefore the scheme will not progress until this element has been undertaken. Any contract to the delivery partner should have contractual terms which ensure that these obligations are passed on to the delivery partner, alongside appropriate KPIs.

### 3.3 Risk management implications

The below summary outlines the key risks that may occur during the project and the mitigations that have been put in place, supported by Table 4 and Table 5. A risk register will be maintained throughout the life of the project and reviewed monthly as a minimum.

- A. Funding Shortfalls:** Ensuring adequate and consistent funding from government grants based on progress and managing the funding. Insufficient Government revenue funding to deliver the scheme successfully. This placing an obligation on the Council to support the funding of the revenue elements of the scheme, officer salaries, marketing, and surveying and other associated overhead costs.  
*Mitigation:* Project and finance plan based on provision of funding batches and progress and Public Health grant funding to support the scheme
- B. Awareness and Engagement:** Low uptake among the target demographic due to lack of awareness or access. Resident and landlord engagement and appetite across the private rented housing sector to sign up to the scheme.  
*Mitigation:* Conduct extensive outreach through local community centres, GP offices, schools, and social media campaigns to ensure maximum engagement.
- C. Logistical Challenges:** Delays in installation or disruption to households during the installation process.  
*Mitigation:* Partner with experienced local contractors that are recommended by the Specialist Retrofit Contractor (Delivery Partner) and ensure effective planning of installations to minimize disruption. Monitor installation and works with a site and project manager checking quality.
- D. Reputational Issues:** Many home energy efficiency upgrades associated with the ECO4 scheme have been identified as being inadequate and have been undergoing reassessment. This has led to the suspension of some Trustmark registered suppliers and may lead to a drop in public confidence in government funded home improvement schemes.  
*Mitigation:* Transparent communication with residents about previous scheme issues and clear processes in place to prevent poor domestic retrofit practices, and where issues do arise ensuring a quick and responsive customer focus approach to resolving issues.
- E. Supplier competency:** agreeing the appropriate compliant procurement route to market and appointing suitable contractors, with the relevant experience, expertise and accreditations to deliver the scheme.  
*Mitigation:* Regular conversations within house procurement team, suppliers, and procurement framework providers to ensure quality and social value needs for the project.
- F. Incorrect, incomplete, or duplicate installations:** there could be a lack of auditing and management of the delivery of the scheme by supplier.  
*Mitigation:* Quality check and balance need be in place to appropriately manage and audit the delivery of the scheme by the supplier and in house Project Manager.

Table 3: WH:LG risk assessment

Ref	Risk	Inherent Risk		Risk Assessment Score	Mitigation Residual Risk		Residual Risk Assessment Score
		Likelihood 1-6	Impact 1-4		Probability 1-6	Impact 1-4	
A	Funding	6	3	18	3	2	6
B	Engagement	4	3	12	2	2	4
C	Customer Experience	6	3	18	4	2	8
D	Reputation	4	4	16	3	2	6
E	Supplier Competency	6	4	24	3	2	6
F	Independent Verification and Quality	5	3	15	2	2	4

Table 5: WH:LG risk assessment scoring matrix

Likelihood	Negligible Impact	Marginal Impact	Critical Impact	Catastrophic Impact
Very High	6	12	18	24
High	5	10	15	20
Significant	4	8	12	16
Low	3	6	9	12
Very Low	2	4	6	8
Almost impossible	1	2	3	4

### 3.4 Environmental implications

- 3.4.1 The WH:LG scheme has positive environmental implications by reducing carbon emissions and supporting the transition to net zero. The scheme aims to improve energy efficiency in homes through upgrades like insulation, solar panels, and air source heat pumps, contributing to a more sustainable and environmentally friendly built environment for the privately owned and rented sector, by helping homes use less energy, leading to a reduction in overall energy consumption and associated emissions. By improving energy efficiency, the scheme helps reduce the carbon footprint of homes, contributing to national efforts to reach net zero emissions by 2050 and supports the council's Climate Change Strategy.
- 3.4.2 The scheme supports the green economy by creating jobs in the retrofit industry, including tradespeople and those involved in planning and design. Promoting energy-efficient homes and low-carbon heating reduces reliance on fossil fuels and contributes towards the UK having a more sustainable energy system. By reducing carbon emissions and promoting energy efficiency, the scheme helps mitigate the impacts of climate change, such as rising global temperatures and extreme weather events.
- 3.4.3 Energy efficiency upgrades can also lead to improved indoor air quality and temperature, making homes healthier and more comfortable. With improved insulation and ventilation, the heat can be maintained in the home reducing rates of illness related to cold and damp living environments.
- 3.4.4 Overall, the scheme has significant positive environmental implications.

### **3.5** *Equality implications*

3.5.1 The implementation of the WH:LG project will have an impact across all age groups. It is essential to mitigate risks for all residents within a home, particularly those who are vulnerable due to illness, disability, age (including children and older adults), or pregnancy.

3.5.2 Specific considerations include:

- **Race and Ethnicity:** Considerations of cultural preferences, individual beliefs, and potential language barriers that may prevent effective engagement with the scheme have been made and are addressed in the resident engagement strategy and approach to promoting and delivering the scheme.
- **Religion and Belief:** We must ensure that religious practices or beliefs do not pose a barrier to participation. The engagement strategy and procured supplier are sensitive to and respectful of diverse faiths and belief systems.
- **Low-Income Households:** Ensuring the design and installations are within the parameters of the scheme to remain within allocated funding for each property is essential. Also, providing accessible information about how the scheme works, and addressing specific challenges such as poor ventilation in small properties or issues related to overcrowding will be conducted.
- **Health Status:** Additional attention must be given to individuals living with respiratory conditions or other non-communicable diseases, whose health may be especially affected by poor housing conditions. The scheme should be implemented in a way that protects and promotes their health and well-being. There will be opportunities to support health and healthy living during the delivery of the scheme.

3.5.3 These considerations are critical to ensuring the Warm Homes Scheme is inclusive, equitable, and effective in reaching and benefiting all segments of the population.

3.5.4 Full details of the equity and equality impacts of the scheme are presented in Appendix 4 and Appendix 5, respectively.

### **3.6** *Corporate Parenting Implications*

3.6.1 There are no Corporate Parenting Implications associated with this report.

### **3.7** *Procurement implications*

3.7.1 The WH:LG project team will be undertaking a procurement exercise to secure a delivery partner, via a route that is compliant with the Procurement Act 2023. A number of options have been considered, including open tender, direct award or mini competition via a framework, and a dynamic purchasing system (DPS). A soft market testing questionnaire was published on the SE Portal on 22nd May 2025, with a deadline for responses of 30th May 2025. Feedback from this exercise has been used to inform the appropriate procurement route.

3.7.2 A business case has been prepared and approval from the Procurement Review Board is being sought prior to Cabinet.

- 3.7.3 It is understood from discussions with DESNZ that should the scheme be successful, further funding may be awarded. It is proposed to tender for a delivery partner with the ability to deliver a project worth up to £5m, but making clear the current parameters of the project in terms of funding availability and term. If future funding is available, the Council's Procurement Review Board will review the business case and Cabinet authority will be sought if it is proposed to exercise any extensions in the contract.
- 3.7.4 This strategic procurement statement outlines the procurement approach for delivering the scheme's objectives efficiently, sustainably, and in compliance with relevant laws and regulations:
- The procurement process will be transparent and ensure quality and addressing local needs for money;
  - The project team will manage the funds allocated to them, ensuring that they are used effectively and in accordance with the scheme's guidance.
  - Engaging with experienced suppliers, contractors, and partners who have a proven track record in energy efficiency, quality installation, and social programmes.
  - Ensuring that procurement processes are competitive, fair, and transparent, in line with public procurement regulations.
  - Prioritising long-term value by considering lifecycle costs, sustainability, service reliability, and the customer journey.
  - Encouraging innovative solutions that offer improved energy efficiency, lower running costs, enhanced comfort for recipients, and improved public health outcomes.
- 3.7.5 Public procurement supports the priority national and local outcomes and strategies for public benefit. The national priorities for procurement in the National Procurement Policy Statement are regarded in this procurement process. The following social value outcomes have been considered alongside the local priorities:
- Creating new businesses, new jobs and new skills in the UK;
  - Improving supplier diversity, innovation and resilience;
  - Tackling climate change and reducing waste.

### **3.8** *Workforce implications*

- 3.8.1 As discussed in Section 2.6, two additional roles are required to support the delivery of the WH:LG scheme, including a Project Manager and a Project Officer. These roles will be funded by the Public Health budget at an estimated cost of £200,000 over three years. The roles will however sit within the Carbon and Sustainability team (see Figure 3) where there is resource available to oversee project delivery. These roles will be fixed term posts, active for the duration of the project.

### **3.9** *Property implications*

- 3.9.1 The scheme will have direct property implications, as one of the key outcomes of the scheme is improved housing quality in Slough. Increased energy efficiency of eligible properties including upgrades like insulation, draught-proofing, and efficient heating systems will lower energy consumption and improve EPC ratings; contribute towards reducing carbon emissions; create a warmer, more comfortable indoor environment, potentially reducing health problems associated with cold homes, and lower utility bills to reduce the financial burden on Slough residents.

- 3.9.2 Types of upgrades covered by the WH:LG include :
- Insulation: Wall, loft, underfloor, and tank insulation.
  - Heating Systems: Heat pumps (air and ground source), and smart heating controls.
  - Renewable Energy: Solar PV panels, battery storage (with solar PV), and solar thermal systems.
  - Other Improvements: Draught-proofing, double/triple glazing, and low-energy lighting.
- 3.9.3 The Domestic Minimum Energy Efficiency Standard (MEES) Regulations set a minimum energy efficiency level for domestic private rented properties. The Regulations apply to all domestic private rented properties that are:
- let on specific types of tenancy agreement
  - legally required to have an Energy Performance Certificate (EPC)
- 3.9.4 Since 1 April 2020, landlords can no longer let or continue to let properties covered by the MEES Regulations if they have an EPC rating below E, unless they have a valid exemption in place.
- 3.9.5 HMO properties are managed under a licensing scheme by the Public Protection Service, under the Housing Act 2004 and Licensing of Houses in Multiple Occupation Regulations 2018.
- 3.9.6 The Prescribed Description Order 2018 does not change the occupation requirement. For mandatory licensing to apply, the HMO (or Flat in Multiple Occupation) must be occupied by 5 or more persons, from 2 or more separate households.
- 3.9.7 Alongside owner occupiers and private landlords of self-contained properties, HMOs that meet the tests of eligibility will qualify for the WH:LG scheme. Landlords subject to tenants' eligibility and compliance with HMO regulations, will be eligible for their first property to be fitted with energy efficiency measures or low carbon heating free of charge, and any additional properties they will need to contribute 50% towards the cost up to a maximum value of £315,000 across their portfolio. It is important that any energy efficiency measures do not compromise minimum room size standards.

#### **4. Background Papers**

None