

**Report for:** Cabinet

**Title:** Council Housing Energy Action Plan

**Report authorised by:** David Joyce, Director of Placemaking & Housing

**Lead Officer:** **Rob Krzyszowski, Assistant Director Planning, Building Standards & Sustainability**  
**Judith Page, Assistant Director Housing Property Services**

**Ward(s) affected:** ALL

**Report for Key/  
Non-Key Decision:** Key Decision

## **1. Describe the issue under consideration**

- 1.1 This report sets out the Council's Housing Energy Action Plan for its housing stock and how energy efficiency retrofits will be implemented across the Council's housing portfolio. The full Council Housing Energy Action Plan is provided in Appendix A.
- 1.2 It sets out the properties that the Council will focus on with its capital and match funding to deliver in Phase 1 2023-2025.
- 1.3 The report covers the:
- background context and Council targets (sections 6.1)
  - energy metrics and standards (section 6.2)
  - stock selection (section 6.3)
  - key principles (section 6.4)
  - funding the retrofit (section 6.5)
  - social housing decarbonisation funding bid (section 6.6)
  - resident engagement (section 6.7)
  - governance and reporting (section 6.8)

## **2. Cabinet Member Introduction**

- 2.1 Our borough's homes make up 50% of the borough's total carbon emissions, through electricity demand and heating requirements. It is the biggest sector we need to tackle to ensure we deliver our borough Net Zero Carbon ambition. With the Council owning approximately 17 per cent of the borough's housing stock, and our Council homes amount to approximately 7-8% of the borough's total emissions. The Council must deliver projects to reduce emissions and help tenants reduce their energy costs.
- 2.2 While retrofitting over 15,000 homes by 2035 will be challenging both technically and financially. Acting on climate change and retrofitting council homes will deliver homes that are healthy, comfortable, and affordable places to live. This will benefit the tenants of these homes, and alongside this it can help develop local supply chains and encourage private homeowners/landlords to follow our example.

- 2.3 This action plan sets out a clear set of measures and deliverable actions, enabling us to start the decarbonisation of our social housing stock. Together we will see the co-benefits of reducing fuel poverty, creating new jobs in our community, improving local air quality, and increasing the amount of income our tenants can spend in the economy. All the more important in the current energy and cost of living crisis.

### **3. Recommendations**

That Cabinet:

- 3.1. Approve the policy, management, and design approach of retrofitting the Council's housing stock as set out in this report and the Housing Energy Action Plan attached (Appendix A).
- 3.2 Agree the prioritisation criteria for retrofitting the council housing as set out in section 6.3 of this report.
- 3.3 Agree that following a draft retrofitting design and identification of funding to deliver the necessary measures the Council will undertake consultation with those affected to secure community views on the measures proposed in properties that have been identified as appropriate for a retrofit. This consultation will be carried out in line with the approach set out in the Housing Energy Action Plan and will be concluded before designs are finalised.
- 3.4 Agree that the outcome of the consultation be reported to the Director of Placemaking and Housing to authorise finalised designs in consultation with the Cabinet Member for Housing Services, Private Renters and Planning.
- 3.5 Agree to delegate authority to the Director of Placemaking and Housing after consultation with the Cabinet Member for Housing Services, Private Renters and Planning, the Director of Finance and the Head of Legal and Governance, to accept funding and enter into funding agreement(s) that will support the delivery of the works identified within the Housing Energy Action Plan, from external sources such as the SHDF in the event that any future bid is successful.
- 3.6 Agree that subject to agreement of the above stages (3.1 through to 3.5) the first batch of properties to be retrofitted will be selected from the properties listed in Section 6.6.8 of this report.

### **4. Reasons for decision**

- 4.1 The Haringey Climate Change Action Plan sets a target for the Council's Housing stock to be an average EPC rating of B by 2035 and EPC A, where technically feasible, by 2041. Nearly all the existing Council housing stock will require some form of retrofit to meet these targets. Adopting this 5-year Action Plan will ensure that the retrofit targets are met in a cost-effective manner, while minimising technical risk, improving comfort levels and protecting tenants from increasing energy prices.

- 4.2 Retrofitting the Council's housing stock requires significant investment. The Action Plan will set a clear plan of the measures and costs, this will enable the Council to confidently bid for external funding. Securing Government funding, such as from the £800m Social Housing Decarbonisation Fund (SHDF), will reduce the ask on the Council's capital HRA budget.
- 4.3 The increasing cost of energy is significantly impacting on our tenants. It is estimated one in four of the borough's homes is in fuel poverty. The approach set out in this report and appendices will support tenants with these costs.

## **5 Alternative options considered**

### **5.1 *Do nothing***

This was rejected as it would not meet the Council's targets set in Haringey's Climate Change Action Plan. It may also result in ad-hoc retrofits being undertaken which do not meet the targets or are not cost effective.

### **5.2 *Adopt a 10-year retrofit plan***

The retrofit sector is evolving. New technologies may emerge, and the cost of installations may reduce as the market responds to the net zero agenda. It is recommended that a 5-year plan is adopted with the view to learn and adapt the Council's approach at the end of the period.

### **5.3 *Delay and wait for a clear technical roadmap***

The Council could wait for a national regulatory framework or for other local authorities to determine the best approach before commencing its retrofit programme. However, the Council has declared a Climate Emergency, and this would jeopardise meeting the Haringey Climate Change Action Plan commitments and tenants would continue to face rising energy prices and/or fuel poverty. Opportunities to reduce costs by factoring in energy efficiency measures when carrying out planned maintenance, such as boiler or window replacements, would also be lost.

### **5.4 *Consult on the Action Plan with the wider community***

The Council has already published and consulted on its Affordable Energy Strategy (adopted July 2020), and the Borough's Climate Change Action Plan (adopted March 2021). Further consultation is unlikely to add any more detail to the measures proposed. Any delay in implementation of the Council Housing Energy Action Plan would not reflect the need for action which is required to respond to the cost-of-living crisis.

## **6.1 Background information**

- 6.1.1 The Council Housing Energy Action Plan sets out the Council's approach to retrofitting its housing stock, with detailed targets and outcomes for the period 2023 to 2028.
- 6.1.2 It has been developed by a cross departmental working group with support from consultants Turner and Townsend. Haringey's own stock data and energy investment modelling software (Portfolio) were used to inform the plan.

### 6.1.3 The objectives of the Council Housing Energy Action Plan are:

- 1) To reduce the carbon emissions from the Council's housing stock and meet Haringey Climate Change Action Plan targets

Haringey's Climate Change Action Plan sets a target for the Council's housing stock to reach an average EPC Band of B by 2035 and EPC Band A by 2041, where this is technically feasible.

A reduction in the housing carbon emissions could be achieved by replacing fossil fuelled heating with electric heating, such as heat pumps, on the assumption that by 2050 the grid will have been decarbonised through renewable energy generation. However, insulating the properties first will reduce overall energy demand mitigating against expensive upgrades to local electricity networks and reducing the size and capital cost of the heating system itself.

- 2) To minimise the impact of rising energy costs on Council tenants and meet the objectives of Haringey's Affordable Energy Strategy to reduce fuel poverty.

The retrofits will be designed to avoid increasing tenants' energy costs. Electricity costs more per unit than gas. Converting properties to electric heating could therefore increase energy bills. The focus will therefore be to reduce energy demand to ensure that annual fuel bills do not increase due to the retrofit. Insulating properties to a good standard will retain heat for longer, reducing energy use and could enable tenants to benefit from time of use tariffs. This will provide tenants with some protection from the current energy price crisis.

6.1.4 The current average for the Council's stock is a low EPC rating of C. 6,232 homes are EPC D and below. To achieve EPC B, nearly all of the Council's existing 15,453 homes will require energy efficiency interventions. Circa 1,500 homes per year will need retrofitting to achieve the 2035 target.

## 6.2 Energy Metrics and Standards

6.2.1 Energy Performance Certificate (EPC) ratings are well known and understood by residents. However, to support the Climate Change Action Plan target of retrofitting the Council housing stock to an EPC B by 2035, additional heat demand metrics are proposed (46 kwh/m<sup>2</sup> pa for semi/detached homes and 39 kwh/m<sup>2</sup> pa for other dwellings).

6.2.2 Adopting this heat demand metric will reduce carbon emissions by 98.23%<sup>1</sup> and household heating bills by an average of 28%<sup>2</sup>.

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<sup>1</sup> 98.23% is calculated using the expected grid intensity in 2038. By 2050 grid decarbonisation will reduce emissions by 99.31%

<sup>2</sup> The heating bill reduction is an average estimate based on calculations made on the council housing stock data loaded into the Parity Portfolio database. It is an estimate of the annual heating and hot water energy use based on the fuel costs from Table 12 of [SAP 2012](#) (SAP is the methodology used by the government to assess and compare the energy and environmental performance of dwellings.)

- 6.2.3 Each property will require different retrofit solutions. However, retrofitting a property from an Energy Performance Certificate rating of D to A would require the installation of a number of measures and these are likely to involve
- insulating walls (cavity walls or external)
  - underfloor insulation,
  - replacing doors and windows (double glazing units) or improved draughtproofing
  - changing from a gas boiler to low carbon heating systems such as heat pumps.
  - Installing solar PV or solar thermal
- 6.2.4 Emerging retrofit standards such as Energiesprong and EnerPhit will be used strategically due to the high cost of delivery. For example, when structural issues with a property require a deeper or more complex level of retrofit or where remedial works exceed £30k.
- 6.2.5 Models such as Energiesprong have the potential to offer a quick installation with minimal disruption to the tenants and guaranteed energy performance. Haringey has previously investigated Energiesprong and worked with installers to scope and design a project in the borough. Due to high costs we will not be delivering an Energiesprong project at this time. However, we will work with the marketplace to ensure that if costs reduce, we are able to procure and install this or a comparable technology.
- 6.2.6 The EnerPhit standard is a deep retrofit approach to properties that uses the same principles as the Passivhaus standard used for new build properties. It focuses on fabric first, deep retrofit and air tightness and space and cool heating targets. The model sets very high standards but where achieved will give residents a high quality retrofit to the properties best potential. This is met by a higher cost.

### **6.3 Stock Selection**

The criteria for selecting stock to be included in the retrofit programme will be based on:

- Targeting the worst performing stock, to prioritise those in fuel poverty
- Alignment with the planned major works or boiler replacement programmes to reduce enabling costs (e.g., for scaffolding) and disruption for residents and maximise match funding
- Utilising void periods to undertake retrofit measures alongside remedial works
- To complement regeneration, new build projects and any external wall works programme resulting from the Fire Risk Appraisal of external walls (FRAEW)

### **6.4 Key Principles**

The key principles of the Council's Housing Energy Action Plan are: -

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- *Whole House Retrofit Plans with a fabric first approach*  
This involves upgrading the fabric of the property (walls, roofs, windows, floors, doors), thereby reducing heat demand in the first instance, followed by decarbonising heating systems and installing onsite renewables.
- *Worst first – alongside integration with major works programmes*  
While the vast majority of the retrofit works will be channelled into the mainstream programme, separate arrangements will be put in place to deliver out of sequence works to the poorest performing stock which cannot wait for the mainstream cycle.
- *To align with borough wider strategic objectives to deliver maximum impact*  
This involves looking at significant infrastructure projects, such as the Decentralised Energy Network (DEN) programme and ensuring that positive opportunities are taken.
- *To phase out the installation of new gas boilers after 2026*  
These will be replaced with decarbonised heating systems, with air source heat pumps (ASHPs) being the most likely alternative over the next 10 years. ASHPs will require the Council to ensure that the houses have high levels of insulation before fitting. While ASHPs are low carbon, due to their low temperature heat output, they are expensive to run in badly performing buildings.
- *Compliance with Government retrofit standards (PAS2035/2030) and Trustmark.*  
This will ensure that projects are eligible for current government funding streams and reduce the risk of introducing unintended consequences such as damp, mould, and overheating. Following PAS2035 will result in each home being assessed to confirm the package of works to be installed and phased as appropriate with cost reviews and options included as part of the process. PAS2035 includes a monitoring and evaluation process to ensure the quality of works and that properties perform as expected post installation. This will be required at the end of all works on our homes, and will be embedded in all projects through the Councils procurement process.
- *Working in partnership with tenants on co-design*  
This to ensure effective tenant engagement before, during and after works.
- *Support innovation in reducing energy costs.*  
The Council will continue to review emerging technologies and innovation, such as Energiesprong and Enerphit. However, these will need to demonstrate local business cases or increased external funding.
- *To use HRA budget to leverage additional external funding and secure value for money*  
We will use the agreed funding in the Capital programme to lever in other funding streams. e.g., bid for Social Housing Decarbonisation Fund. Projects are designed to deliver value for money by:-
  - analysing retrofit measure combinations to achieve the greatest energy efficiency gains

- optimising planned works to reduce installation costs eg. shared scaffolding costs, designing and delivering existing maintenance programmes in a way that means retrofit measures can be installed at a lower cost later on. For example, to specify a roof replacement with longer eaves, to avoid having to extend eaves at a later date when external wall insulation is installed.
- scheduling works in a way that allows measures to be installed more cost effectively and reduces disruption to tenants

## **6.5 Funding the retrofit**

- 6.5.1 Meeting the EPC B target and adopting the heat demand metrics set out in paragraphs 6.2 above will require investment which is currently not fully scoped. This includes installation costs to cover project management, enabling works and some scope for price increases. It is recognised that this funding gap is beyond the current budget in place, however this will be kept under review and officers will continue to identify opportunities to find alternative sources of funding (including from the government).
- 6.5.2 A large amount of the funding gap has been identified as works that are already required to maintain our stock over the next 19 years and will be subject to MTFS approval in relevant years. These works include components such as windows, boilers, walls and roofs.
- 6.5.3 Within the current 10-year HRA plan, £101m has been assigned to fund retrofit works to Council stock, in addition to the major works programme. Of this £101m, £34m is included in the draft HRA budget for 2023 to 2028 presented to cabinet in December 2022. This HRA budget can be used to leverage additional funding, such as the Government's £800m Social Housing Decarbonisation fund.
- 6.5.4 It is expected that the residual amount will come from external resources. The Council will actively seek out funding opportunities for the benefit of our communities. It will ensure it is bid ready for government funding opportunities such as the current Social Housing Decarbonisation Fund. Opportunities to secure Energy Company Obligation (ECO) funding will also be explored with obligated energy suppliers. Should this funding not be realised, the programme will need to be scaled back accordingly.
- 6.5.5 The impact of any energy saving works on leaseholders will be managed in accordance with agreed council policies. Leaseholders will be engaged in decisions to ensure that costs are manageable and that energy bills are more sustainable. For some properties, the energy efficiency upgrades required will be significant. We will investigate options from funding streams for the private sector which can support leaseholders with buying into any new technologies planned for tenanted stock or fabric improvements which are rechargeable.

## **6.6 SHDF Bid**

- 6.6.1 The Council has made an application to the second wave of funding (£800m) from the Social Housing Decarbonisation Fund (SHDF). This government

scheme is focused on improving the energy performance of social rented homes, with the objective of raising properties to EPC B and C, on the pathway to net zero.

- 6.6.2 The first phase of the retrofit programme has modelled around the current window replacement programme. This has been used to identify properties which are eligible for grant funding.
- 6.6.3 Overall, 465 homes are included in phase 1 of the retrofit programme. This will be delivered from 2023 to March 2025. Of these 465 homes, 405 are eligible for SHDF funding. The rate of retrofit delivery will ramp up in the following phases and targets will be agreed with the delivery partner, once in place.
- 6.6.5 It is already planned to undertake energy efficiency works on 176 properties in 2024 as part of the refurbishment of Broadwater Farm. The works include external wall insulation, ventilation, and a window replacement.
- 6.6.6 The cost to deliver the retrofit work, along with available funding is set out in the tables below:

	<b>Cost</b>	<b>SHDF Funding</b>	<b>Council Funding (HRA)</b>
Street Properties - Value of Works	£5.5m	£2m	£3.5m
Street Properties -Administration and Ancillary costs	£971k	£293k	£678k
Broadwater Farm value of works	£7.7m	£2m	£5.7m
Broadwater Farm administration and ancillary costs	£670,000	£264,000	£406,000
<b>TOTAL COST</b>	<b>£14.8m</b>	<b>£4.5m</b>	<b>£10.3m</b>

The costs were reviewed against Housing Property Services schedule of rates (2022) and are now subject to a soft marketing exercise for confirmation.

- 6.6.6 There is capacity within the Council's Housing carbon budget 2023/24 and 2024/25 to fund the Street properties retrofit (£4.2m). The works at Broadwater Farm are already included in the existing refurbishment budget (£6.1m).
- 6.6.7 It is proposed to undertake fabric improvements to these properties. Where properties are scheduled for a boiler replacement in the near future, or already have electric heating, a heat pump may be considered. Where heat pumps are installed the properties can be considered a pilot project and their performance evaluated for future roll-outs.
- 6.6.8 A summary of the phase 1 retrofit projects for delivery in 2023 to 2025 are shown the table below. These have been selected using planned works data



alongside the worst performing properties. Further retrofit phases will be scheduled once future planned maintenance schedules are determined. Please note, the sites listed below are subject to more detailed analysis and may change.

### Houses

<b>Estate Name</b>	<b>Total Nos of properties</b>	<b>Nos eligible for funding</b>	<b>No of Leaseholder properties</b>
Coldfall, N10	218	158	0
Scattered	26	26	0
White Hart Lane N17	39	39	0
Antill/Hanover, N15	4	4	0
Quernmore Rd, N4	2	2	0
<b>TOTALS</b>	<b>289</b>	<b>229</b>	<b>0</b>

### Flats To be installed 2024/25

<b>Area</b>	<b>Total Nos Properties</b>	<b>Nos of properties eligible for funding</b>	<b>Nos of tenanted properties</b>	<b>Nos of Leaseholder properties</b>
Broadwater Farm – Marthlesham and Rochford	176	176	142	34

If successful, SHDF funding will contribute £16,900 for each leasehold property. The Council's contribution will require Section 20 Consultation; however the grant funded element may not be recharged to Leaseholders.

## 6.7 Consultation

- 6.7.1 The need to deliver this retrofit programme has been demonstrated and consulted on through various consultation channels and the development of related Council strategies. These include the development of the Council's Affordable Energy Strategy, and the Borough's Climate Change Action Plan. Both of these documents asked for and received feedback on the need, and the targets to be achieved in the delivery of affordable energy costs for residents and tenants. The Council is now taking this agreed ambition forward through the development of this Action Plan.
- 6.7.2 The success of any retrofit programme is dependent on buy-in from residents. Given the level of potential intrusive and disruptive works, as well as introduction of new and unfamiliar technologies, raising awareness and proactive resident engagement planning is key. We will therefore work in partnership with tenants on co-design and ensure effective engagement before, during and after works. As such a retrofit project engagement template has been designed which covers all stages of the process and is included in the Council Housing Energy Action Plan (Appendix A).

6.7.3 The consultation process will include formal s105 consultation of those secure tenants potentially affected by the works, together with s20 consultation of leaseholders as appropriate.

## **6.8 Governance and Delivery**

6.8.1 A cross departmental programme management group will be set up and will meet regularly. This will oversee the implementation of this Action Plan.

6.8.2 Works will be delivered by Housing Property Services Asset Management Team where existing roles include a Senior Energy Project Manager, Energy Project Manager and Community Energy Liaison officer. These post holders will be supported by the existing Major Works delivery project team with a view to integrating delivery into the major works programme.

6.8.3 To deliver the retrofit projects in 2023 a procurement is required to appoint a multi-disciplinary design consultant to complete retrofit assessments, technical designs, cost and construction plans. Award of these contracts will be subject to further decision making papers. This approach will best support us to deliver any successful bid from the SHDF, make informed decisions for the delivery of the retrofit programme and be prepared for the partnering contract to deliver the majority of retrofit works to the stock.

6.8.4 From 2024 retrofits will be delivered through the new housing delivery partnering contracts. The procurement of a contractor has commenced and will be subject to further cabinet approval.

6.8.5 Works at Broadwater Farm will be delivered through the refurbishment programme and will be subject to further cabinet approvals.

6.8.4 To ensure that wider local benefit of the transition of to our low carbon future is realised, the Council is working closely with the College of Haringey, Enfield and North East London (CONEL) on shaping their syllabus to ensure that there is a local trained workforce to undertake these works, either as an individual or SME's or a workforce that can be employed within larger Council contracts. This has resulted in training on installation of insulation and PAS2035/2030 standards being able to be offered to the community. The Council will also be directing residents to these training and development opportunities. The Council will then be ensuring that future procurement requires a local workforce to be used.

6.8.5 Progress will be publicly reported as follows: -

- Annually through the Annual Carbon Report
- Bi-annually to government through the Home Energy Conservation Act (HECA) requirements

## **7. Contribution to strategic outcomes**

7.1 Achieving the borough's Climate Change Action Plan outcomes will require extensive refurbishment of the borough's housing stock.

7.2 Improving the energy efficiency of our housing stock to reduce fuel bills is the most effective means of achieving a key objective of the Council's Affordable Energy Strategy 2020-2025. Improving the energy efficiency of homes remains the most sustainable, long-term solution to fuel poverty.

## **8. Statutory Officers comments (Chief Finance Officer (including procurement), Head of Legal and Governance (Monitoring Officer), Equalities)**

### **8.1 Strategic Procurement**

8.1.1 Strategic Procurement note the content of the report. Strategic Procurement will work with the service area in the delivery of future procurements associated with the energy action plan.

### **8.2 Finance**

8.2.1 This project is to bring the listed properties to EPC rating B. The total number of properties identified is 465, of which 405 is eligible for social Housing decarbonisation fund (SHDF).

8.2.2 It is estimated that this phase of the project will cost £14.8m. It is expected that £4.5m will be funded from SHDF and £10.3m will be funded from HRA.

8.2.3 There is a provision in the BWF capital programme budget/MTFS for £6.1m decarbonisation works and £4.2m in the carbon reduction programme budget.

8.2.4 The current HRA financial plan (carbon reduction programme) has a provision of £101m over a 10-year period.

8.2.5 There is a risk that the project might be scaled back if no funding is received or lower than projected funding is received.

8.2.6 There are about 34 leaseholders that will be affected by this project. It is expected that leaseholders will contribute their share of cost of the works.

8.2.7 Their contribution cannot be reasonably estimated at this stage until external funding is confirmed. It is estimated that grant funding for leasehold unit will be circa £16,900. This will reduce the leaseholder contribution to costs of works.

### **8.3 Legal**

8.3.1 The Head of Legal and Governance has been consulted in the drafting of this report.

8.3.2 By s105 of the Housing Act 1985 ("the Act") the Council is required to consult those of its secure tenants likely to be substantially affected by matters of housing management to which the section applies.

8.3.3 The works envisaged by this report constitute a "new programme of...improvement..." within the meaning of the section and hence consultation is required in accordance with the Council's arrangements.

- 8.3.4 The Council's standard residential long leases include an obligation to contribute towards repair and in many cases also towards improvement. Consultation under s20 of the Landlord and Tenant Act 1985 is required where the Council seeks to recover the cost of such works; further advice as to the form that consultation must take will be given as and when further reports seek authority for the procurement of those works.
- 8.3.5 The multi-disciplinary consultant and works contractor(s) will need to be procured in accordance with the Public Contracts Regulations 2015. These appointments will be subject to further reports.
- 8.3.6 In the event that funding is secured, an agreement(s) should be entered into in accordance with the procedures prescribed under CSO 4.02, 9.07 and 17 of the Council's Contract Standing Orders. This report recommends that Cabinet delegate authority to the Director of Placemaking and Housing (after consultation with the Cabinet Member for Housing Services, Private Renters and Planning the Director of Finance and the Head of Legal and Governance), to accept funding and enter into funding agreement(s). Accordingly, if approved by Cabinet, the Director will be authorised to enter into funding agreement(s) notwithstanding that they may be in excess of £500,000 in value.

## **8.4 Equality**

- 8.4.1 The Council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:
- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
  - Advance equality of opportunity between people who share those protected characteristics and people who do not
  - Foster good relations between people who share those characteristics and people who do not.
- 8.4.2 The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status apply to the first part of the duty.
- 8.4.3 This decision relates to the Council's Housing Energy Action Plan for its housing stock and how we will implement energy efficiency retrofits across the Council's housing portfolio.
- 8.4.4 Increased energy efficiency will benefit tenants in Haringey Council housing by decreasing energy costs. Black people, older people, people with disabilities, women and naturally low-income households are over-represented among current Council tenants. Therefore, reducing tenants' energy bills is likely to impact those with protected characteristics positively, and readers should note that there are no predicted negative implications.

8.5.4 Reducing carbon emissions has broader equality implications for the population. The climate crisis will disproportionately impact younger people, lower-income people, and already marginalised groups. Therefore, measures to reduce carbon emissions represent means of preventing and mitigating future inequalities.

8.5.5 As an organisation carrying out a public function on behalf of a public body, the Contractor/s hired to perform the retrofits will be obliged to have due regard for the need to achieve the three aims of the Public Sector Equality Duty as stated above.

## **9 Use of Appendices**

Appendix A – Council Housing Energy Action Plan

## **10 Local Government (Access to Information) Act 1985**

None