

**HOME ENERGY CONSERVATION ACT 2013  
STATUTORY SUBMISSION  
CITY OF LONDON**



**Version 1.1**

**31<sup>st</sup> March 2013**

## **EXECUTIVE SUMMARY**

The City of London Corporation is the local authority for the City of London. Older than Parliament the City of London Corporation has centuries of proven success in supporting a world-class financial centre and today is sustaining and developing the City's position as the leading global financial and business centre.

The City continues to value the role of its residential population in maintaining the City's unique character and vitality and recognises the contribution its continued presence makes to the profile of residential accommodation in central London.

The resident population from the 2011 census was 7,400, although though it is believed that his number is swelled by approximately 10% by transient visitors and second home owners <http://www.cityoflondon.gov.uk/services/environment-and-planning/planning/development-and-population-information/demography-and-housing/Documents/census-of-population-2011-city-of-london-introduction.pdf> . The majority of City residents are concentrated in the north and east of the City in the Barbican/Golden Lane and the Middlesex Street and Mansell Street Estates.

In the Summer of 2012 an assessment of energy efficiency of residential stock in the City of London was carried out. The assessment was based on data provided through the EPC data register provided by Landmark. The results indicated that 47% of properties in the City had been EPC rated and that the average EPC score for the City is 66. The averaged 'potential' EPC score for the City was rated at 70.

In this review the City reflect on existing measures already being undertaken by various parties with new initiatives that could be adopted. Activities include broadening energy advice schemes and promoting further site based energy groups.

The HECA 2013 neither says nor implies that energy conservation measures identified need be directly implemented by the City of London Corporation. Where possible the existing practice of including energy conservation measures in other repairs, maintenance and improvement projects will continue. However such projects are always subject to the City's financial control procedures and the actual resources available at the time each project is evaluated in detail.

The City recognises that the personal circumstances of certain households require special consideration when exercising its powers in connection with the provision of energy efficiency measures. It recognises that households have other special needs relevant to the delivery of energy efficiency services. These needs arise as a result of age, disability, children, language, cultural and hearing and visual impairment. The City will take these into account when defining or encouraging the delivery of energy efficiency improvements.

The City Corporation are actively seeking funding for energy efficiency measures to be carried out to their housing assets through the Energy Company Obligation (ECO) and other funding streams.

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## **Introduction**

### **A. Background**

- 1.0 The Home Energy Conservation Act (HECA) was enacted in 1995. The HECA required all local authorities including the City of London to publish a report setting out actions they would take to improve home energy efficiency by a significant amount over a 10 to 15 year period. Local authorities were also required to report regularly on progress towards that goal.
- 2.0 Government has now requested further reports pursuant to the provisions in HECA recognising the key role that local authorities have to play in improving the energy efficiency of the residential accommodation in their areas, and thereby achieving reductions in domestic carbon emissions.
- 3.0 All English authorities with housing responsibilities have been asked to prepare a report setting out local energy conservation measures that the authority consider practical, cost-effective, and likely to significantly improve the energy efficiency of both privately owned and public residential accommodation in its area.

### **B. The City of London (Corporation)**

- 4.0 The City of London is a unique and historic environment, just one square mile in area yet home to approximately 9,000 residents and almost 13,000 national and foreign businesses. Over 340,000 people commute into the Square Mile every day from across London and the surrounding regions.
- 5.0 The City of London is the only non-party political authority in the country and operates through its elected Lord Mayor, Alderman and members of the Court of Common Council.
- 6.0 As well as promoting the business community the City has a host of other responsibilities which extend far beyond the Square Mile benefitting London and the country as a whole. It runs the internationally renowned Barbican Arts Centre, is the port health authority for the tidal Thames estuary and is trustee of the five bridges that cross the Thames into the City. It manages a portfolio of properties and protects over 11,000 acres of open space in and around London, including Hampstead Heath and Epping Forest.
- 7.0 The City of London:

- promotes London as the world leader in international finance;
- tackles social exclusion in partnership with neighbouring boroughs;
- is one of the most significant art sponsors in the UK;
- operates the City of London Police authority;
- manages almost 11,000 acres of London's green space;
- provides facilities for the Central Criminal Court, the 'Old Bailey';
- runs three of London's famous wholesale food markets;
- manages London's largest grant-giving charity, the City Bridge Trust; and
- provides affordable residential housing across London.

8.0 In terms of energy efficiency, the City of London's great age gives it a unique perspective. It is acutely aware of the need to provide affordable warmth for its poorest and most vulnerable residents, and it is also very conscious of the threat that climate change poses to the City's services and infrastructure.

9.0 To this end the City of London is seeking to reduce carbon emissions across the Square Mile, whilst ensuring that businesses and residents are aware of and prepared to reduce their exposure to rising energy prices.

### **C. Residential Property in the City of London (Assessment of residential energy efficiency and Statistical data)**

10.0 The City of London itself owns and manages 2,872 properties in London across a total of 13 housing estates in inner London, two within the Square Mile, and the other nine across other London Boroughs. In general the City of London priorities its focus at those estates most in need of measures subject to funding. City of London estates are:

- Avondale Square estate – SE1
- Dron House – E1
- Golden Lane Estate EC2
- Holloway Estate – N7
- Middlesex Stree Estate E1
- Isleden House – N1
- Southwark estate – SE1
- Sydenham Hill estate – SE26
- William Blake estate – SE1
- Windsor House – N1

- York Way estate – N7
- Spitalfields – E1
- City of London and Gresham Almshouses – SW9

11.0 The table below shows the breakdown of the stock by tenure.

City Of London Housing Stock	
Tenure Breakdown	
Tenanted	1962
Sold	888
Guest Flats	8
Business	2
Leased to John Grooms HA	12
<b>TOTAL</b>	<b>2872</b>

- 12.0 At 31st March 2011, 6,064 housing units existed in the City of London and include a small number of self-contained properties where the dwelling unit is occupied for less than 90 consecutive days (short-lets).
- 13.0 The majority of the City's units 3,718 units (61.3% of the total) are located in the North of the City in the large concentration of dwellings, particularly at the Barbican Estate (2,069 units), Smithfield (736 units) and Golden Lane (565 units). The key City places of Aldgate, Thames & Riverside, and the rest of the City are areas of mixed land use which have a range of smaller scale comprising of 100 to 330 units.
- 14.0 The Cheapside, St. Paul's and the Eastern side of the City have a predominant focus on business activity with a low number of residential units (93 and 49).
- 15.0 Units with one habitable room comprise 1,173 dwellings within the City (19.3%), mainly as 'studio' apartment or bedsits with a single living space and no separate bedrooms. The area containing the highest proportions of 'studios' and bedsits is Queenhithe (42.4%) and the Mansell Street Estate (34.3%). The lowest proportion is found to the West of the City in the Temples (2.2%).

- 16.0 Units with two habitable rooms comprise 1,876 dwellings (30.9% of the total). Units with three habitable rooms comprise 1,674 units (27.6% of the total). Within the individual areas the highest proportion is in the Middlesex Street Estate (33%). Units with four habitable rooms comprise 723 units (11.9% of the total). The highest proportions are found in the North of the City (15.5%).
- 17.0 Units with five or more habitable rooms comprise of 618 units (10.2% of the total), and have the highest proportion of units in the North of the City (13.7%). With the Barbican Estate having the highest proportion (22.2%) of this type of unit.

### **Index of Multiple Deprivation**

- 18.0 The Index of Multiple Deprivation (IMD) is a measure of deprivation applied in England. It is based on the idea of distinct dimensions of deprivation which can be recognised and measured separately. The IMD is made up of seven domains, these domains are combined according to different weightings to give the total IMD. Overall the City of London is a relatively affluent district; it is 259 in the Rank of Average Scores out of the 326 Local Authority Districts in the country. Thus the City is within the 40% Least Deprived of Local Authorities in England.
- 19.0 In terms of income and employment, the City of London has the highest ranking in Greater London and the second highest ranking in the Country. There are two highly ranked areas within the 20% least deprived areas in England; these are the Barbican East and Barbican West. The Mansell Street and Petticoat Lane area is the most deprived in the City and falls in the 40% most deprived areas in England as defined by the IMD.
- <http://www.cityoflondon.gov.uk/services/environment-and-planning/planning/development-and-population-information/demography-and-housing/Pages/default.aspx>

### **Energy Efficiency and Climate Change**

- 20.0 The City of London's ambitions with respect to energy efficiency are contained within its 2011 Climate Change Mitigation Strategy. This is available for download from the City of London's [website](#).
- 21.0 The City's Climate Change Mitigation Strategy sets a short term target of a 15% reduction in energy consumption by 2015 a medium term target of 34% reduction in greenhouse gas emissions by 2020 and a long term target of an 80% reduction in greenhouse gas emissions by 2050 (from 1990 levels).



22.0 Additionally the City of London are a leading authority on climate change adaptation and this pioneering area lead to the City being recognised as a Beacon Council on Climate Change in 2009.

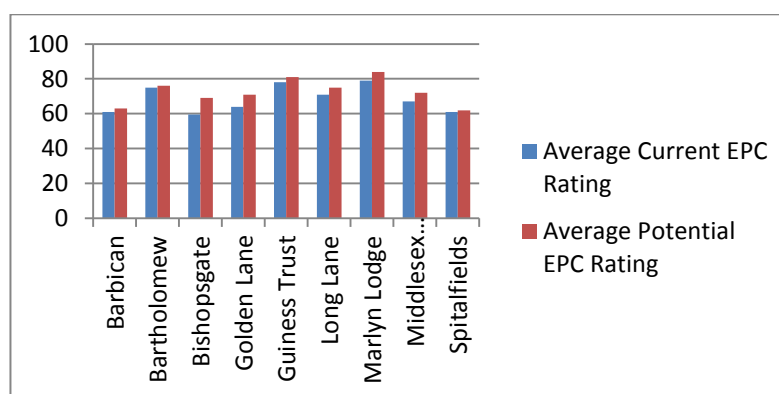
23.0 The City of London’s priorities for pursuing these targets include:

- ensuring that places, spaces and buildings are designed in ways that support low-carbon lifestyles;
- providing high quality services whilst minimising their impact on climate change;
- harness expertise and build capacity for a low-carbon economy and low-carbon lifestyles; and
- in addition to acting as a social Landlord to 2,040 households through its Affordable Housing Strategy, the City of London funds Housing Associations to provide new affordable and supported housing for Key Workers and people in greatest need.

### **Energy Efficiency of the City’s Residential Accommodation**

24.0 In 2012 an approach was made to Landmark for Energy Performance Certificates (EPC) data. This would allow the City of London to build a picture of residential energy performance.

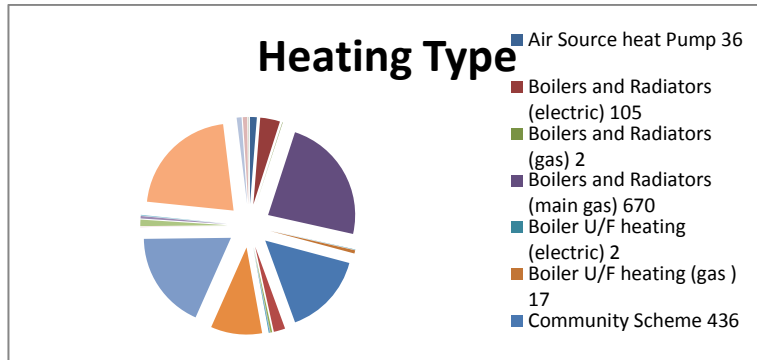
25.0 Over 47% of City residencies have been EPC rated. Over 95% of these properties are flats/apartments. The average EPC rating for City residential properties is 66. The average potential EPC rating for these properties is 70.



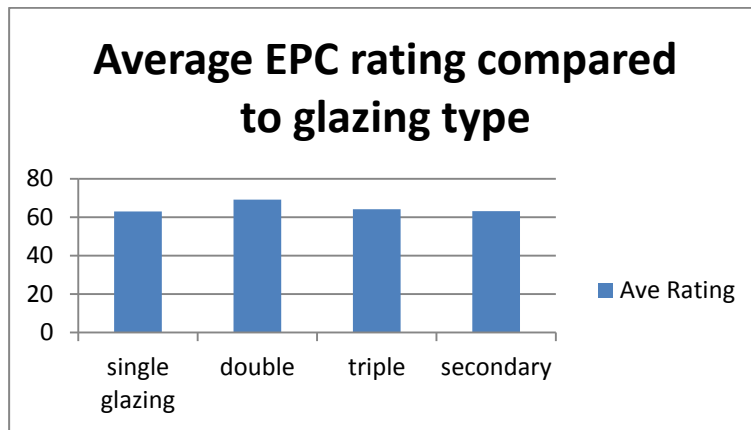
26.0 There is an even representation of heating types across the City’s residential accommodation with over 75% of heating being provided by four common types of heating:

- Boiler and radiators – 23%

- Electric Room heaters - 21%
- Electric U/F heating – 18%
- Community heating – 15%



27.0 With regards to glazing type there is again an even distribution of ratings across the different glazing types.



#### D. Current Energy Efficiency Programmes and Measures in the Community

28.0 The City has an active programme of resident engagement events including promotion of Green Deal and the Energy Company Obligation. Recent City events include:

- 10/02/12 – Clean City Awards event for small businesses;
- 01/03/12 – City Together;
- 30/05/12 - Central City Residents Events;
- 20/10/12 – Resident celebration day (Guildhall);
- 08/12/12 – Golden Lane Christmas fair;
- 26/01/13 – Give and Take day Golden Lane Housing estate;
- 02/02/13 – Mansell Street event; and
- 08/01/13 – Clean City Awards for small businesses.

- 29.0 In addition Our Common Place in the City of London has been working with three communities funded by a City Together grant from The City of London Transport and Sustainability Forum. The project centred on the Golden Lane Estate with additional work on the Mansell Street and Middlesex Street Estates. Our Common Place built on creating sustainable Communities, Waste Watch's previous community engagement work in the City of London.
- 30.0 Responding to the shortcomings of best practice approaches, Waste Watch developed Our Common Place (OCP) a 'next practice' work programme. OCP places a strong emphasis on combining education about environmental and social issues with deeper level explorations of the root causes of unsustainable lifestyles.
- 31.0 One of the objectives of the OCP project was to help residents minimise their energy consumption. Waste Watch organised two workshops on draught proofing and other ways of saving heat, hot water and electricity. This struck a chord with residents, many of whom complained of the difficulty and expense of keeping their homes warm. In some instances complicated by estates Grade II listed status and the age of the buildings. The workshops focussed on draught proofing as an accessible intervention that would not interfere with the properties' appearance and therefore listing.
- 32.0 The workshops were promoted through the Golden Lane Estate website, via posters and to the e-mail lists of people who had attended previous events.
- 33.0 The workshops focussed on ways to reduce heat loss and behaviour change to cut electricity consumption. This included demonstrating how to use a 'real time display' electricity monitor to minimise a home's baseline energy consumption. Residents were offered the opportunity to borrow one of these monitors and two workshop attendants chose to do so.
- 34.0 Waste Watch compiled a guide of Golden Lane specific energy saving advice. This included the information and ideas shared at the energy saving workshops. In addition, we worked closely with an architect who lives on Golden Lane and has worked on several energy efficiency improvement projects on estate properties. This enabled us to include advice on more intensive changes such as glazing and insulation, as well as how to apply for any planning permission necessary.

## **E Local Energy Efficiency Programmes and Measures**

35.0 The City of London through the DCCS must link into and support other departmental and corporate strategies and policies. These will include:

- Departmental Business Plan
- City of London Corporate Plan
- City's Community Strategy
- Climate Change Mitigation Strategy
- Sustainability Policy
- Other Relevant plans, strategies (to be advised).

36.0 From the City's own perspective each City department including the Department of Community and Children's services has its own Departmental Energy Action Plan (DEAP).

### **City of London Department of Children's and Community Services** **Potential Energy Efficiency Works to Housing Stock since 2008.**

<i>Block and Estate:</i>	<i>Works undertaken</i>	<i>No of Properties Affected</i>	<i>Year Undertaken</i>
Longland Court (ASE)	Cavity Wall Insulation	87	2009/10
Tovy House Annexe (ASE)	Cavity Wall Insulation	6	2008/09
Procter House Annexe (ASE)	Cavity Wall Insulation	8	2008/09
Tevatree House (ASE)	Cavity Wall Insulation	7	2008/09
Avondale Square Estate various Blocks	New/Replacement Boilers	74	
Dron House Various flats	New/Replacement Boilers	12	
Golden Lane Estate Various	New/Replacement Boilers	19	
Holloway Estate Various	New/Replacement Boilers	39	
Isleden House	New double glazed windows	76	2008/09
Isleden House	New/Replacement Boilers	2	
Middlesex Street Estate	New triple glazed windows	201	2010/11
Middlesex Street Estate	New/Replacement Boilers	2	
Markstone House (SE)	New double glazed windows	32	2008/09
Bazeley House (SE)	New double glazed windows	32	2008/10
Collinson Court (SE)	New double glazed windows	72	2008/11
Collinson Court (SE)	Cavity Wall Insulation	72	2008/12
Great Suffolk Street (SE)	New double glazed windows	16	2008/13
Southwark Estate	New/Replacement Boilers	69	
Lammas Green Flats (SHE)	New double glazed windows	30	2010//11
Lammas Green Houses (SHE)	Cavity Wall Insulation	6	2009/10
Sydenham Hill Estate	New/Replacement Boilers	9	
Windsor House	New/Replacement Boilers	19	
William Blake Estate	New/Replacement Boilers	17	
Spitalfields	New/Replacement Boilers	10	
Almshouses	New/Replacement Boilers	29	

37.0 The DEAP ultimately feeds into meeting the aims and objectives of the departments business aims. By saving on energy usage, departmental energy bills should reduce, producing savings to reflect better value for money. Furthermore, increased energy efficiency on the estates managed by the Department will demonstrate a commitment to the wider environment.

38.0 This will be achieved by such initiatives as the central heating call-backs programme (which puts gas central heating from combi-condensing boilers into flats with no or inadequate heating), working with outside agencies to secure funding for example, through the ECO further energy efficiency works (e.g. loft and cavity wall insulation) to the housing stock. Staff are also consulted upon measures at individual estates which will improve the local environment in terms of energy usage and estate amenities.

39.0 The City of London takes a proactive approach to the maintenance and upkeep of its properties ensuring that properties, their services and systems are maintained to operate efficiently at all times. To this end the City of London ensures that:

- checking the energy efficiency for communal boilers within the City (and other sites outside the borough boundary):
- regular checks on the boiler management system (BMS) and identifying potential problems and energy inefficiency.
- undertake regular checks on hot water temperature
- undertake regular weekly checks on communal boilers as part of the maintenance contract and
- undertake any necessary adjustments to improve boiler efficiency on site.
- carry out ad hoc checks on boilers to ensure they are working at their most energy efficient.

40.0 Within specific dwellings the City of London will routinely inspect to ensure consideration of the following:

- Replacement of standard radiator valves with thermostatic radiator valves (TRVs) ;
- Installation of room and/or boiler thermostats where none are in place at present:
- Lagging of hot water tanks.
- Fitting of combi smart devices to boilers to prevent water and heat wastage

- Replace broken light fittings with energy efficient fittings/bulbs;
- Draught-proofing of windows and doors;
- Secondary glazing (where no longer term plans to replace windows exist).
- Lagging of pipes to communal boilers

41.0 The CoL will aim to develop procedures to support all such energy conservation initiatives identifying and allocating appropriate funding where necessary.

42.0 On the City's own estate the number of boiler installations remains consistent in many cases replacing old inefficient electric heating systems.

No. of Boiler Installations by Estate and Year						
Estate	Year					
	2008	2009	2010	2011	2012	totals
Avondale	14	16	18	15	11	<b>74</b>
Dron	1	2	2	3	4	<b>12</b>
Golden lane	5	2	5	2	5	<b>19</b>
Holloway	19	7	3	6	4	<b>39</b>
Isleden	1	1	0	0	0	<b>2</b>
Middlesex St	0	1	0	1	0	<b>2</b>
Southwark	14	16	12	14	13	<b>69</b>
Sydenham Hill	4	0	1	4	0	<b>9</b>
William Blake	7	2	0	6	2	<b>17</b>
Windsor	7	4	7	1	0	<b>19</b>
COLA	27	1	0	0	1	<b>29</b>
Gresham	0	0	0	0	0	<b>0</b>
Spitalfields	2	4	0	2	2	<b>10</b>
Totals	<b>101</b>	<b>56</b>	<b>48</b>	<b>54</b>	<b>42</b>	<b>301</b>

43.0 The CoL strives to establish a proactive approach to including energy measures as a matter of course in future works programmes

and maintenance contracts. Including practical measures to reduce energy loss. This will include items such as:

- Timers installed on heating and power;
- A log of complaints about heating and the action taken to remedy this ,
- Monitoring of maintenance regimes to ensure Contractors are doing all possible works to improve energy efficiency;
- Obtaining Monthly reports from contractors detailing what measures they have undertaken to reduce energy usage;
- Consider setting contractor's performance targets to achieve better energy efficiency;
- Consider water meters to estate office and staff offices and report quarterly on changes in water usage;
- Meters to be installed in individual properties supplied by communal systems to provide accurate billing energy usage and encourage more responsibility for their own usage.

44.0 The City of Londons' Department of Community and Children's Services DEAP will be an on-going plan that will develop over time and assume new priorities as and when circumstance and legislation dictate. Future changes to the plan will need to be discussed with Energy Management to ensure their priorities are matched by departmental action.

#### **F. Central Government Initiatives (Green Deal and Energy Company Obligation)**

45.0 The **Green Deal** is a new financial package, being introduced in October 2012, which allows householders and businesses to pay for energy efficiency improvements to their properties over a period of up to 25years.

46.0 The **Green Deal** payments are designed to be less than the financial savings the householder or business accrues on their energy bills as a result of the work, resulting in an overall financial saving for the householder or business. The 'charge' is paid via the business or householder's electricity bill and stays with the property, not the householder or business, should they move. It should be noted that the savings are not guaranteed.

47.0 The City has already begun to engage with residents on the benefits and opportunities available through Green Deal through its various engagement programmes highlighted in para 28.0

48.0 The **Energy Company Obligation** is a requirement on the country's large energy suppliers to meet carbon reduction and heating cost reduction targets in domestic properties. These targets are split into three categories with different objectives:

- The **Carbon Reduction Target** – an estimated £760 million will be invested by March 2015 in installing insulation in properties that require more expensive or difficult solutions.
- The **Affordable Warmth Target** – an estimated £350 million will be invested by March 2015 in helping those receiving multiple benefits to reduce their household energy bills.
- The **Carbon Saving Communities Target** – an estimated £190 million will be invested by March 2015 in social housing and street-by-street projects in wards with a rating on the Indices of Multiple Deprivation (IMD) that places them in the lowest 15% in the country. Of the £190 million 20% must be spent in rural areas.

49.0 The **Renewable Heat Incentive** is a tariff-based approach to giving businesses and householders a financial incentive to install renewable heat generation, such as district heating. At present, a scheme specifically for householders, called the Renewable Heat Premium Payment, has been introduced to give direct payments from Government to subsidise the cost of installing the renewable heating systems. Householders are then required to provide feedback on how the equipment works. This will be replaced by the tariff system alongside the introduction of the Green Deal.

50.0 The City of London has already begun to promote the above initiatives and 'tap into' funding support mechanisms where appropriate. The City Corporation are actively seeking funding for energy efficiency measures to be carried out to their housing assets through the Energy Company Obligation (ECO) and other funding streams.

51.0 The City will continue to look to additional funding support mechanisms to facilitate additional energy saving measures wherever practical and feasible.



## **G. ACTION SUMMARY - PLAN**

Objective	Action	Responsibility	Completion By	Progress update
Climate Change Mitigation Plan		Sustainability Team	January e 2014	
EPC certificates, improving quality of data and scope of data held by CoL to support database of energy efficiency measures.	Update EPC data annually  Analyse and compare and contrast	Energy Team	January 2014	
Improve energy efficiency of CoL housing thro' accessing funds and installing measures		DCCS and Energy Team	March 2014	
Promote ECO and Green Deal in private sector and website		Sustainability team		
Promotion of energy efficiency and outreach work	Green Deal raise awareness through RSLs	EMT and DCCs		
Develop DCCS Longer term energy reduction action plan	Update twice yearly providing focus for priorities for CoL properties.	EMT and DCCS	June 2013, January 2014	
Resident Engagement	Develop mechanisms to engage in constructive dialogue to promote measures.	DCCS and EMT	January 2015	

Engagement with Fuel Suppliers	Develop mechanisms to engage in constructive dialogue to promote measures.	DCCS and EMT, all Officers	January 2015	
Engagement with Health and Wellbeing professional boards	Develop mechanisms to engage in constructive dialogue to promote measures.	All officers	January 2015	

## **H. Engagement With City Residents and Tenants - Overcoming Barriers to Undertaking Energy Conservation Measures**

52.0 Numerous studies have been undertaken over the years into the attitudes to energy conservation in the home, the general points that emerge from these are:

- Environmental concern is widespread;
- Concern at rising energy prices is high;
- People can often feel powerless and do not feel they have the skills to act effectively to change the status quo;

53.0 In addition to these many people feel variations of the following:

- Mistrust – ‘information is provided by people with a vested interest’
- Inadequate information – information and advice can be conflicting or unclear.
- Limited Choice – Seldom were packaged measures available or products were visually acceptable.
- Motivation – Energy saving isn’t always fashionable and is often promoted in a heavy and depressing way
- Cost – uncertainty over paybacks which were perceived as being too long.

54.0 With regards to engagement with trades-people many homeowners feel that communication is a big barrier:

- Getting hold of information – is time consuming and independent sources generally unknown.
- Communication – do not always understand advice given and often need help and support with finer details.
- Lack of co-ordination – between agencies and trades-people.

55.0 In order to overcome these barriers the City of London will continue to adopt a number of measures, developing a strong positive message on energy conservation, providing quality information as personal as possible, but continuing to use a variety of media and engage with and promote financial incentives such as Green Deal and the Energy Company Obligation where appropriate

56.0 The messages conveyed should be targeted to the needs of the individual be they, money saving, comfort improvements, improving health or minimising investment.

## **I Financial Limitations**

57.0 The HECA 2013 neither says nor implies that energy conservation measures need be directly implemented by the City of London.

58.0 The extent to which the City of London may be able to make resources available to promote and/or implement specific energy conservation measures will depend, amongst other things on the following:

- The constraints on the City Fund and Housing Revenue Account;
- The priority of energy conservation measures compared to other priorities and demands for limited resources;
- Residents support for initiatives given the potential for increased rents and charges compared to savings in resident's energy costs.

59.0 Where possible the existing practice of incorporating energy conservation measures in on-going repairs, maintenance and improvement projects will continue. However such projects are always subject to the City's financial control procedures and the resources available at the time each project is evaluated in detail.

60.0 The City recognises that the personal circumstances of certain households require special consideration when expressing its powers in connection with the provision of energy efficiency measures. It recognises that households have other special needs relevant to the delivery of energy efficiency services. These needs arise as a result of age, disability, children, language, cultural and other physical impairment. The City will take these into account when defining or encouraging the delivery of energy efficiency improvements.

### **Progression of HECA 2013**

61.0 This report its aims and objectives will be subject to continuous review. The City's obligations under HECA 2013 require further and progress reports to be continually updated and which will be made available at [www.cityoflondon.gov.uk](http://www.cityoflondon.gov.uk)