

## **Belfast City Council response DfC Fuel Poverty Strategy**

### **1.0 Introduction**

Belfast City Council (“the Council”), welcomes the opportunity to respond to the DfC consultation on a draft Fuel Poverty Strategy for Northern Ireland. The emerging draft strategy presents an opportunity to reset this critical agenda, to refresh it and to introduce a new urgent focus to continue to bear down on a problem which too many low-income households continue to suffer from. Fuel poverty is the biggest single factor contributing to the cost-of-living crisis in Belfast which impacts on health and wellbeing.

The response is set out in two parts; the first is an overview of the key strategic and cross-cutting issues which the Council would recommend be considered when finalising the Strategy. The second part sets out detailed comments in respect of the specific questions posed.

#### **(i) A time of challenge but also opportunity**

The Council believes that the draft Fuel Poverty Strategy is presented at a time of both significant challenges faced by many households but also opportunity for all partners to come together to develop new integrated and sustainable approaches to supporting those most vulnerable in our society.

There is little doubt that the scale and complexity of challenges with a dangerous combination of higher energy prices, reduced incomes, and leaky, energy inefficient housing could create the perfect storm and push many households further into fuel poverty. These increases come at a time when many household budgets are already stretched thin.

As part of the recent refresh of the Belfast Agenda (City’s Community Plan), a key and immediate area of concern emerging from key stakeholder groups, community and voluntary sector representatives, citizens, communities of interest and elected Members, was the growing fuel poverty crisis facing the city and communities. There was a strong call to action for community planning partners to work with NICS Departments to move quickly to bring forward immediate and integrated measures to support vulnerable people alongside helping inform the development on long-term and sustainable approach and underpinning strategies, policies and programmes.

Living in fuel poverty can severely affect a person’s life in a wide range of ways, on physical and mental health, household finances, the economy and ultimately on people’s quality of life. While we understand and embrace the fact that its causes are complex and its consequences are multiple, there is an opportunity through community planning to create the environment and bring the key stakeholders together to develop achievable actions. Whilst immediate and practical interventions and support can be brought forward to help mitigate the effects of fuel poverty; we would commend that a broader and integrated programme and longer-term policy levers are required to seek to eradicate fuel poverty within Belfast and wider region.

The Council would highlight the collaboration which has taken place over recent years with the Department, and the role of Council working closely with community partners to get significant funding and support to those impacted by fuel poverty across the city. There is no doubt of the effectiveness and impact of central and local government working together to deliver the level of public services are citizens deserve or in responding together in times of emergency.

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The long-term solution for NI lies not only in improving the energy efficiency of all homes, but also simultaneously addressing the climate crisis by providing low carbon energy solutions for all homes. Integrating low carbon and renewable technologies (which are now cheaper than fossil fuels) removes the issue of insecurity of supply and also eliminates the price volatility of gas and oil. Integration of renewables, battery storage technology and smart digital meters to the housing sector is the key to meeting the legislated net zero carbon target and should feature prominently in any fuel poverty strategy.

The Fuel Poverty Strategy comes at a time when the global climate crisis is ushering in a transformative change in technology, accelerating the move to a low carbon clean energy future unique once in a generation opportunity to create low carbon communities.

### **ii. Working together to deliver**

By challenging the traditional ways of working and breaking through silos, the draft fuel poverty strategy provides an ideal platform to roll out a 'whole system approach', strengthening the relationship between regional and local government and creating an environment which facilitates the joint provision of sustainable support. The Council is therefore fully committed to working alongside colleagues in the NI Executive and the Voluntary and Community sector, to co-design and support the delivery of specific programmes of work required to achieve the ambitions set out in the draft strategy.

The Council believe that to deliver on the ambitions and priorities contained in the draft strategy it is essential that both tiers of government work together in partnership to develop the policy and delivery frameworks by which to address the major challenges being faced by our citizens. There is a real opportunity to maximise the synergies and linkages between regional and local outcomes and together design impactful programmes and initiatives which will help address many of the entrenched societal and economic issues impacting upon local communities across Northern Ireland.

### **iii. Protecting consumers**

Given our commitment to inclusive growth, Belfast City Council is keen to ensure that future energy strategy ensures strong consumer engagement and protection, while also empowering and enabling communities through the development of local community energy systems and networks. We support approaches that engage and involve people in energy supply, as this has positive impacts for good urban behaviour, e.g. more efficient energy behaviour and reduced consumption.

### **iv. Regulatory impact assessment**

The introduction of any new regulatory duties in NI will need to be subject to a thorough regulatory impact assessment and the financial assessment to deliver that regulatory duty would need defined and provided for within NIA budgets. Any new duty potentially impacting on local government would need to be consulted on and budget defined so as to have no financial impact to ratepayers.

**Detailed response to questions set out in consultation.**

**Vision and Principles**

1. Do you agree with the proposed vision and guiding principles? If not, please suggest alternatives and why

- Agree with Vision and Principles and welcome the long-term sustainable solutions approach with a Just Transition embedded within the strategy. The Council particularly welcomes the principle of working in collaboration as local government has initiated several work streams and allocated to significant resources to alleviate fuel poverty through the cost-of-living programmes and addressing the climate crisis. Councils also have statutory responsibilities associated with housing management, building control, planning and environmental health in the past have utilised these skills and resources to worked collaboratively with central government to resolve the issue. The Council would highlight the work being undertaken by the inter-sectoral 'Belfast Retrofit Hub' who refer to the critical need for collaboration across sectors as well as clear referral networks, particularly with regard to any plans for one stop shop/s.
- We would suggest that consideration is given to how the longer-term solutions take account of the important role of the benefits system which is a key element in ensuring that households have access to financial support to heat their homes.

**Q2.** Do you agree with the timeframe and review period? If not, why not?

- We support the proposed 10-year period of the strategy, acknowledging the timeframes and policy certainty required by householders as well as the lead in time required by industry to invest in skills development, labour development and supply chain. We also support the 5-year review build into the process. The commitment by DfC to review of the Fitness standard by 2030 is welcome, however, the review of the Fitness standard must be a priority for the Department as it not only has an impact on fuel poverty measures, but also home accident prevention and protection of vulnerable occupants.
- Belfast City Council would encourage the introduction of a new standard at the earliest opportunity due to the age of the existing standards which substantially lag behind the standards currently enjoyed in other jurisdictions.
- We would also highlight the pace of growth in next technologies emerging in relation to clean energy production and management and many of the smart digital solutions could be adopted to relieve fuel hardship in the short-term.

**Make homes more energy efficient.**

**Q3** What would a readily understandable and measurable definition of "thermal comfort" look like?

- **Social housing** - the limitations of EPCs are well known but remain the leading primary metric along with SAP ratings. We concur with NIHE targets of attaining SAP rating Band C by 2030.

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- Thermal comfort describes the human satisfactory perception of the thermal environment. It refers to a number of conditions in which the majority of people feel comfortable.
- Thermal comfort describes the warmth, ventilation, and humidity of a room in which at least 80% of occupants would describe as comfortable.
- In terms of measurability, with regards to the Fitness Standard in privately rented properties, the current method is by using temperature/humidity datalogging equipment to interpret whether the dwelling meets the minimum required by Private Tenancies Northern Ireland Order 2006 Officer's Guidance Document which states; "In deciding whether a house is or is not unfit, the authority should consider whether the house currently has for heating a main "living" room, provision for fixed heating, capable of efficiently maintaining the room generally at a temperature of 18 deg C or more than the outside temperature is -1 deg C, and for the other main habitable rooms, provision for heating capable of maintaining an equivalent temperature of 16 deg C or more."
- Thermal comfort depends on wider factors than just looking at temperature in isolation; an approach considering a suite of factors should include:
  - Temperature: as defined by WHO standards
  - Relative Humidity: for example, between 30% and 60% to prevent condensation and discomfort caused by high humidity.
  - Ventilation: There is a gentle air movement of for example 1.5m/s to prevent drafts and discomfort caused by stagnant air.
  - Thermal satisfaction: The overall thermal comfort experience is rated as satisfactory by at least 80% of occupants.
  - The conservation and retention of thermal energy within properties as identified by the standards of Technical Booklet F1 (Conservation of fuel and Power) of the Building Regulations (NI) in an effort to increase the conservation of fuel and power.
  - The provision and maintenance of adequate ventilation of domestic dwellings as identified by the performance criteria within Appendix A, Technical Booklet K (Ventilation) of the Building Regulations (NI) in order to limit moisture, mould, and the accumulation of pollutants.
- A readily understandable and measurable definition of thermal comfort in the home can be based on a combination of the above factors. To make these definitions more accessible to homeowners, however, consider the following:
  - Encourage homeowner use of a simple thermometer to measure indoor temperature.
  - Encourage homeowner use of hygrometer to measure relative humidity.
  - Encourage homeowner use of a portable fan or blower to improve air movement.
  - A smart thermostat or a thermostat with a built-in sensor to monitor and adjust temperature and humidity levels.
- By promoting use of such measures, homeowners are better equipped to create a comfortable indoor environment that meets their thermal comfort needs.

### Q4 For MEES in PRS to effectively alleviate fuel poverty, what information or data do you think would be useful and what barriers would we need to overcome?

To effectively alleviate fuel poverty through minimum energy efficiency standards in the private rented sector, DfC will need specific information and data, as well as an understanding of the barriers that might hinder data collection and analysis. The following information would be useful to provide a sound evidence base for the strategy:

- Up to date private rental tenancy data: establishing MEES for this sector will encourage and direct investment however, it is critical that sufficient lead-in time is allowed and that financial support is provided to support the transition. Failure to do this could result in landlords divesting of low EPC stock which could

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increase pressure on already limited private rental stock. This could lead to increases in homelessness. It could also result in landlords evading registration leading to a greater disconnect with the sector. We would encourage lessons to be learned from Scotland's experience both in terms the funding and support required as well as potential negative impacts and how they might be avoided.

- **Current Energy Efficiency Ratings:** Data on the energy performance of rental properties, typically derived from Energy Performance Certificates (EPCs), indicating their current efficiency levels and potential for improvement.
- **Demographic Data:** Information about the tenants, including income levels, family size, and specific vulnerabilities (e.g., elderly, disabled, children) to identify those at greater risk of fuel poverty.
- **Fuel Poverty Statistics:** Data on the proportion of households that experience fuel poverty, including metrics such as household income, energy costs, and heating needs.
- **Property Characteristics:** Detailed information on housing type, age, heating systems, insulation levels, and any previous upgrades to understand factors affecting energy efficiency.
- **Energy Consumption Patterns:** Data on energy usage trends to understand how energy consumption relates to the energy efficiency of properties.
- **Landlord Compliance and Awareness:** Information on landlord awareness of energy efficiency standards as well as their data relating to existing EPC ratings.

### *Barriers to obtaining this data are likely to include:*

- **Data Privacy and Accessibility:** Concerns over data privacy may limit access to personal information regarding tenants, particularly regarding income and demographic characteristics.
- **Incomplete or Inaccurate Data:** Many properties lack up-to-date EPCs or relevant efficiency data, leading to incomplete datasets. Additionally, inaccuracies in self-reported data from landlords can complicate assessments.
- **Reluctance of Landlords:** Landlords may be hesitant to share information about their properties due to concerns over potential regulations or financial obligations associated with data disclosure.
- **Funding Constraints :** Limited financial resources may restrict DfC's ability to conduct comprehensive research and data collection initiatives.
- **Legislative and Regulatory Challenges:** Complicated legislation surrounding housing, energy efficiency, and tenants' rights may slow the process of gathering and analysing necessary data. Building Regulation considerations and Planning restrictions associated with listed buildings and conservation areas should also be considered where appropriate.
- **Stakeholder Coordination:** Effective data collection often requires coordination among various stakeholders (e.g., councils, housing associations, NIHE, energy providers), which can be challenging to achieve.

To establish effective minimum energy efficiency standards in the private rented sector aimed at alleviating fuel poverty, DfC must prioritise gathering comprehensive and accurate data on housing and energy use. Addressing the barriers to obtaining this information will be crucial for formulating policies and initiatives that truly benefit vulnerable populations while driving meaningful improvements in energy efficiency across NI housing stock.

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### Q5 Should MEES also be applied to other tenures? Please give reasons for your answer.

Yes, MEES should be applied to all tenures. Many owner-occupied households face fuel poverty also and sometimes this can be missed with working parents facing poverty in other areas. Support for “working poor” owner occupier households should be considered.

if supported and resourced adequately, this could be beneficial. This would have to be supported through an adequate funding programme, one stop shop programme and critically, the financial value attributed to homes would have to factor in its energy performance. A report by Right Move highlighted that house prices can be linked to EPC rating but this requires commitment, engagement and training by RICS. Additional resources would be required to ensure roll out of the programme, support and enforcement. (<https://www.rightmove.co.uk/news/articles/property-news/green-premium-epc-ratings/>)

The introduction of minimum energy efficiency standards (MEES) for tenures beyond the private rented sector, such as owner-occupied homes or social housing, can have benefits, for example:

- Environmental Impact: Expanding energy efficiency standards can significantly reduce greenhouse gas emissions, contributing to climate change mitigation efforts.
- Energy Cost Savings: Improved energy efficiency can lead to lower energy bills for residents, making housing more affordable over the long term.
- Public Health: Increased energy efficiency can improve indoor air quality and thermal comfort, leading to better health outcomes for occupants, especially in vulnerable populations.
- Economic Stimulus: Implementing energy efficiency upgrades can stimulate economic activity through job creation in the construction, energy, and related sectors.
- long-term Resilience: Enhancing energy efficiency can make housing more resilient to energy price fluctuations, benefiting both occupants and the economy.

However, there are further considerations which must be taken into account when formulating policy in relation to extension of MEES beyond the private rented sector. For example,

- Cost and Financial Implications: Homeowners may face significant upfront costs associated with upgrades, which could be a barrier, particularly in lower-income households.
- Equity and Access: Ensuring that all households, especially low-income or vulnerable ones, have access to resources and support for achieving energy efficiency improvements is crucial.
- Market Readiness: The construction and renovation sectors need to be equipped to handle increased demands for energy-efficient upgrades, which may require training and resources.
- Regulatory Framework: Implementing these standards would require careful consideration of the regulatory framework, including enforcement mechanisms and potential penalties for non-compliance.

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- Behavioural Change: In addition to regulatory measures, promoting education and awareness around energy efficiency can encourage voluntary adoption beyond just meeting minimum standards.

While there may be compelling reasons to extend energy efficiency standards beyond the private rented sector, careful planning and consideration of the economic, social, and administrative implications are essential for successful implementation. Engaging stakeholders, including homeowners, local governments, and energy providers, can foster collaborative solutions that address the challenges and opportunities associated with improved energy efficiency across various housing tenures. It is suggested that owner occupied, social and private rented sector housing should be of the same thermal standards where possible.

### Q6 Do you agree that introducing updated fitness standards will contribute to making homes more energy efficient? Please provide reasons for your answer.

Yes, introducing fitness standards will make a valuable contribution by setting metrics and timeframes to guide industry and investment.

The introduction of new government housing fitness standards could potentially contribute to making houses more energy efficient, depending on the specifics of those standards. The current fitness standard for human habitation has not been significantly updated since 1981. If the revised standards focus on aspects such as insulation, heating systems, thermal comfort, energy-efficient appliances, and the use of renewable energy sources, they can lead to homes that consume less energy.

Examples of new housing standards, that could improve energy efficiency include:

- Insulation and building materials: Requirements for enhanced insulation and the use of energy-efficient building materials can significantly reduce heating demands.
- Energy-Efficient appliances and systems: Standards that mandate the use of energy-efficient appliances, heating systems, and water heaters can reduce energy consumption in households.
- Renewable Energy Integration: If the standards encourage or require the installation of solar panels or other renewable energy systems, this can lead to self-sufficient homes that rely less on traditional energy sources.
- Smart Home Technology: Incorporating requirements for smart home technology can help residents monitor and reduce their energy usage, including taking advantage of tariff bands at times when energy costs are lower, leading to overall efficiency gains.
- Sustainability Practices: Standards that promote sustainable building practices, such as the use of recycled materials or water conservation measures, can also contribute to energy efficiency indirectly.
- Ventilation Rates for rapid, background and mechanical extract ventilation or energy efficient passive ventilation systems should be considered in accordance with Technical Booklet K (Ventilation) of the Building Regulations (NI)2012
- Occupier education will always help but we cannot be seen to be solely “blaming” the occupier for conditions relating to condensation and mould growth. All other variables must be considered, and landlords given the tools they need to help tenants – this can be educational but financial help will be required for landlords if it is to be successful.



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- An updated Fitness standard will help but it will need to take into consideration the range of types of properties, especially those built before 1945 or from non-traditional construction methods. Retro fitting will be key for older properties which may come at some cost. Grant aid should be made available to landlords or else they will pass the cost of improvements to the tenants.
- Any improvements need to be reasonable, practical and applicable. Clarity will be required on implementation and enforcement responsibilities across Environmental Health and Building Control departments. Clear instruction and guidance for officers must be provided by Depts for Communities/Finance.
- Any additional resources necessary to implement and enforce any proposed legislation must be considered and a full regulatory impact assessment should be undertaken by DfC to assess the financial and resources requirements that will be required by local authorities.

Overall, if new standards are well-designed and enforced, they are likely to encourage the construction of homes that are more energy-efficient, ultimately leading in the long term to lower energy consumption and a positive impact on fuel poverty.

### Q7 Do you agree that all government domestic energy schemes should take account of the Fuel Poverty Strategy principles?

- Yes, we support alignment with the Fuel Poverty Strategy principles. We would highlight the importance of aligning any schemes with the communication needs of the target audience i.e. reflecting the digital literacy levels of vulnerable groups and providing equally suitable and accessible and resourced alternatives.
- We would highlight the need to focus on long-term sustainable solutions. Short term funded schemes or popular schemes with large uptake that result in waiting lists result in large numbers of eligible households not taking up schemes resulting in more households being less energy efficient for longer than needed. Any scheme should include a minimum guarantee for the house that falls under the fuel poverty strategy.

### Q8 Do you agree that DfC should take a more flexible approach that considers current data when setting and reviewing income thresholds and eligibility criteria? Please give reasons for your answer.

- Yes, we support use of a more flexible approach that allows for variations in disposable income, household composition, income types. We also believe that income and eligibility criteria should be reviewed regularly given the current global economic uncertainty and high inflation etc households income and fuel bills situations can change quickly.
- Also, households with certain income can have different situations resulting in more or less energy use etc. family size, dependants etc should be considered. Yes individual households can have additional financial commitments and a set income criterion does not take account of this. Evidence suggests that its is the 'working poor' who are most in need. Disposable income may be one way to counter this.

### Q9. Do you agree that an income threshold should increase in line with minimum wage levels/inflation or another index such as RPI to mitigate increases in the cost of living?

Please give reasons for your answer



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- Yes, income threshold should reflect changes to wider economic factors such as inflation, minimum wage. We would commend that the income threshold should be based on income **after** housing costs. Overall income can appear high but when family size, housing costs, other energy spend are taken into consideration the % of income required to heat a home can be a lot higher than the current % used to calculate fuel poverty based on income.

Q10. Should the Energy Performance Certificate (EPC) rating of a house be considered as part of eligibility criteria (i.e. the least energy efficient homes are considered first)? Please give reasons for your answer.

- Yes, this could help to focus on housing in greatest need of financial support to reduce fuel poverty and could help to increase the longevity of otherwise vulnerable properties. We would caveat this by acknowledging that a sizeable number of homes do not have any EPC certificate and many are out of date. We would also highlight the well documented limitations and would direct DfC to the National Retrofit Hub's document – The Future of Energy Performance Certificates: A Roadmap for Change (<https://nationalretrofit.org.uk/knowledge-hub/epc-reform/>)
- The EPC rating of a home should be considered along with other indicators such as income, expendable income, savings, family size, employment status etc on a sliding scale or matrix type model. Those in a larger, lower EPC rating home may be on higher income with one or two people living in the property so can afford to adequately heat the home whereas some may be in a higher rated EPC home with multiple dependants and very low income so are more at risk of fuel poverty.

Q11. Do you agree that the new scheme should continue with the Whole House retrofit approach? Please give reasons for your answer.

- Yes. A whole house approach is a sensible approach, prioritising basic energy efficiency measures e.g insulation, air tightness etc is recommended as first step . It ensures that improvements are integrated and work together rather than addressing individual problems in isolation.
- Belfast City Council convenes the Belfast Retrofit Delivery Hub and based on extensive discussions with members that are experts in this field advocate that a fabric first, whole house approach is essential.
- We feel this aligns with the long-term, sustainable solutions principle. Schemes that only target the low cost easy to treat “low hanging fruit” of the overall issue will ultimately require further additional support at other times. Retrofit schemes in Scotland and Southern Ireland have shown whole house approach, whilst more costly per house, are preferred by tenants as work will be done once for a set period rather than multiple interruptions.

Q12. If the Whole House approach is used, do you agree that all recommended measures must be installed unless there are exceptional reasons not to? Please give reasons for your answer.

- We support this approach in principle but acknowledge that flexibility will be required e.g. in the case of innovative or nonstandard construction types.
- A whole house retrofit is beneficial as by improving multiple aspects of a home energy consumption is reduced, the retrofit can ensure a more comfortable living environment improving health and wellbeing. A well -executed retrofit can reduce ongoing energy costs especially in older poorly insulated homes.

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- However, a whole house approach can require significant up-front investment and challenges like funding, expertise, and long-term maintenance need to be addressed to make it accessible and sustainable for low-income households. Therefore, it is important that such initiatives are backed by supportive policies, subsidies or financing options to ensure accessibility for those in fuel poverty.

### Q13. Do you agree that the new scheme should prioritise low carbon heating solutions where possible?

- Yes, we support prioritisation of low carbon heating sources and would advocate support and prioritisation of area based heating programmes such as low carbon district heating in the first instance, taking account of planned programmes such as that currently being scoped by Belfast City Council. Failure to do this could undermine roll out of large scale, cost and carbon effective options. We acknowledge the challenges around short term solutions to situations where current fossil fuel boilers fail and pragmatic, immediate action is required, and we would advocate consideration of a hybrid gas/ASHP approach.

### Q14. Do you agree that the new scheme should offer renewable technologies such as solar panels and battery storage to offset the running costs of low carbon heating solutions in low-income households? Please provide reasons for your answer.

- Yes, we support the inclusion of renewable energy technologies as a secondary phase once the fabric first approach has effectively minimised the amount of energy required. This will help to reduce pressure on the already straining grid, protect from fuel price volatility, help to decarbonise electricity, increase fuel security and help to reduce fuel poverty (but only if any energy generated is made available to householders at an agreed lower than market rate).
- NI is unique in that it is the only region within the UK which is 90% dependant on imported fossil fuels for energy demand. A shocking 60% of homes in NI still remain on oil for space heating. This exposure to price volatility in the global oil market, means NI householders are more directly impact by soaring oil prices which leads to higher incidence of fuel poverty than the rest of the UK. There is therefore a unique and unprecedented opportunity to use this fuel poverty strategy to address this issue.
- By supporting the rapid decarbonising the housing sector, we can displace the 60% oil dependency with a combination of energy efficiency measures including the installation of renewable technologies and battery storage.

### Q15. Do you agree that rural properties should be prioritised for energy efficiency support? Please give reasons for your answer.

- No, we feel that all properties should be assessed on relative need and prioritised accordingly.

### Q16. Do you agree with a sliding scale approach to funding for home energy schemes? Please provide reasons for your answer.

- Yes, we would support the proposed sliding scale or multiple indicators matrix approach, as each household even within similar income brackets can have multiple reasons why they can be more or less affected by fuel poverty. The sliding scale approach prioritises those in greatest need and ensures they receive most support.
- We understand that work had bene undertaken previously to develop proposals around a possible approach for a NI specific grant and loan scheme for energy efficiency was worked through several years back to support the plans for a new Energywise Scheme. The recommendations detailed a sliding approach for

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support. This report should be re-examined as a considerable amount of research and consultation went into it. Although many organisations contributed to it, and there was widespread support for the scheme, the proposed scheme did not go ahead and was replaced by a boiler scrappage scheme. A similar scenario cannot be allowed to happen.

Q17. Do you agree that loans are the fairest financing option for landlords who are required to improve their assets? If not, what would you suggest as alternative funding options?

- **Private rental sector** - In the first instance we would strongly advocate a grants based approach for private sector landlords in line with that provided in England (Home Energy Upgrade Scheme), Scotland and Wales. This might be supplemented by a low income loan scheme.
- **Social housing** – we strongly advocate the establishment of an equivalent of the Social Housing Decarbonisation Scheme and various supplementary funding programme and support schemes already in place in GB.

Q18. Do you agree that we should consider increasing levies from electricity bills to fund energy efficiency schemes for low-income households? Please give reasons for you answer.

- Whilst we are concerned at the already high energy bills faced by citizens, we also acknowledge that the funding required for large scale domestic decarbonisation must be raised. We would support the move to increase levies on electricity bills but would welcome clear communications on how funds raised would be reinvested and targeted at homes at greatest risk of fuel poverty.
- Whilst we acknowledge the need to secure funding, we would not support any increase in levies within a detailed analysis of potential impact on vulnerable households. Many households already finding it difficult to cover energy costs, any additional levy passed on to consumers could potentially push households at risk of poverty into poverty.

Q19. Should we explore introducing levies on gas to increase funding for such energy efficiency measures? Please provide reasons for your answer.

- As above, we recognise the need for income generation however we would not support the introduction of levies with detailed impact analysis undertaken. We would advocate a balanced approach similar to that in GB whereby significant contributions come from energy companies.

Q20. What are your thoughts on exploring any revenue-raising opportunities for energy efficiency schemes from unregulated heating sources such as home heating oil?

- We support the concept of applying levies to energy supplies that reflect the carbon intensity of the fuel but appreciate the challenges of implementing this with unregulated industry, however, this support would be dependent on establishment in advance of this, a programme providing financial and practical support for households to move to a lower carbon alternative with wrap around support throughout the process.

### **Collaborate and build capacity.**

Q21. Do you agree that we should and build referral pathways between Government, local Government, health professionals and the Voluntary and Community Sector? If yes, how can we best achieve this?

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- Yes, we support the proposal to build and consolidate referral pathways and utilise networks of Local Government, Statutory and VCSE organisations working to tackle poverty. Based on feedback from the sectors working to address poverty, Belfast City Council have plans to establish an Anti-Poverty Network in Belfast. The purpose of this will be to share information and referral pathways, raise awareness of events & support available, feed into regional initiatives or strategies & inform the delivery of future service delivery and grant funding programmes.
- Yes. Providing information is an important first step. The Belfast City Council cost of living guide offers information on available support and tips on reducing costs. Fuel poverty should be looked at as part of the wider issue of poverty and the first steps should include ensuring that people can access a real living wage, sufficient benefits, advice on how to maximize income and reduce costs. Support is also needed for budget planning – advice providers report that cases are more complex than ever and these skills are needed by those accessing support.
- However, over the past 3 years, BCC has provided a Hardship Programme which has been delivered with key voluntary and community sector partners to particular cohorts which have identified as most vulnerable across the city in the current financial climate. At the outset, funding for the Programme was provided through DfC and BCC allocated additional funds to ensure the widest reach. In 24/25, DfC did not provide a contribution towards the Programme and given the need highlighted through our monitoring of the 23/24 Programme, BCC allocated £1M to the Programme.
- We would stress that while local government is happy to play a part in informing the discussion and using its resources to assist; the root causes can only be addressed by systemic change and the responsibility for provision of help to those in poverty lies within central government departments.
- We would also highlight the lessons learned around this approach to fuel poverty from the fuel poverty project in Whiterock and Westrock ([Northern Exposure: Achieving Warmth in Whiterock and Westrock | Fuel Poverty Coalition Northern Ireland](#)). Any one stop shop must be adequately resourced and be technically competent. A roundtable event focusing on retrofit and one stop shops (Belfast Retrofit Hub), identified a clear need from householders to receive detailed, itemised and prioritised analysis of the measures that could help to make their homes more energy efficient. Support is required by householders to identify trusted contractors, to secure a selection of competent, good value quotes, project commissioning, management and quality assurance. The provision of this service by one stop shops in the ROI is advocated by SEAI to overcome reluctance to engage in retrofit.

### Q22. Do you agree with a taskforce/working group to develop enabling frameworks for EnergyCommunities?

- Yes, we welcome moves to support and enable community engagement in localised renewable energy generation. This approach will also enable input from those with lived experience of fuel poverty to ensure any scheme is fit for purpose as seen from those that will be affected most by the scheme.
- Belfast City Council has considerable experience working with established energy communities in the ROI and the UK through the GenComm and Cityzen projects and are willing to share this experience and access to networks to facilitate the establishment of such communities.

### Q23. Do you agree that government should assess the most relevant recommendations of the NICE6 guidelines and consider their implementation? Please provide reasons for your answer.

- Yes, we welcome assessment and implementation of the recommendations.
- The devastating impact of the cold on poor health and associated increasing costs to the NHS in winter months is well documented in NI. Improving education, understanding and awareness of the negative impact of a cold home among the health, social care and voluntary sectors is key in trying to address it. Often

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those suffering from fuel poverty will trust professionals working in these sectors and are likely to act on advice from them. Evidence from the Warm Home Prescription programmes in the UK show that the fuel poverty related referrals from the health sector are those which have the biggest impact on addressing issue.

- We would also highlight the [Belfast Warm and Well Programme](#) which has been brought forward under the auspices of community planning and is a partnership between the National Energy Action, Health Partners and Council to support vulnerable people in cold homes.

**Q24. Do you agree that we should work with organisations that provide emergency support, to seek a consistent approach across Northern Ireland and the inclusion of a referral to a long-term solution? If so, what would be the best way to achieve this?**

- Yes, we support promotion of emergency support, increased public profile of it along with a consistent approach across NI.
- Belfast City Council have administered a Hardship Programme for the last 3 years working with those organisations providing emergency support to individuals and families living in poverty. Previous years were funded fully or in part by DfC although was not funded for this current 24/25 year. Given increasing demand and feedback from delivery partners & key stakeholders in relation to needs & impact on families, Council agreed to fund the programme again in 2024/25. The best way to provide this support would be to work with organisations and communities locally to identify those most at need of support, to deliver immediate financial relief packages to those households along with further wraparound services to identify reasons for being in and routes out of poverty i.e. counselling, childcare support, training & employment support.
- A model similar to the that adopted for Social Supermarkets and/or Labour Market Partnerships could be considered to provide a more joined up and co-ordinated support system and improve outcomes for people in poverty – providing access to long-term wrap around support.

**Q25. Do you agree with the proposal to prioritise Discretionary Support to provide emergency financial support if there is a future energy or cost of living crisis, until we have better data to target large scale payments? If not, can you provide a reason?**

- Yes, we support the prioritisation of financial support based on the level of need and would again highlight the importance of focusing on disposable income. We would also highlight the adverse impacts on the cost-of-living crisis on a wide range of cohorts including in-work poverty, children and young people and young families. Important that any financial support model brought forward responds to this.

**Q26. Do you agree with the proposal to gain a better understanding of the impact of changes to Winter Fuel Payments and introduce additional support where appropriate? If not, why and do you have alternative suggestions?**

- Yes, we support the move to analyse the impact of changes to the payment system and would support subsequent recommendations to address fuel poverty consequences. Feedback from our Hardship Programme delivery partners have noted an increase in older people seeking support with energy bills since the ceasing of the Winter Fuel Payments. This is why this cohort has been prioritised in the delivery of the £1.1m Hardship Programme

### Protect consumers

**Q27. Do you agree that we should improve our understanding of the impacts of energy decisions on different consumer groups? If so, what would be the best way of understanding these impacts?**

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- Yes, we welcome opportunities to model and analyse the potential implications of energy-based policy decisions.
- We would refer to the analysis of the Ofgem study in GB into the abolition of standing charges on low- income households would indicate that there could be significant positive impact on low- income households. It is likely that a similar study in NI would have similar conclusions. Given that the NI Energy Strategy will usher in transformative change in this market it is recommended that we have a better understanding of how these changes will impact low income households.
- Government should also be encouraged to research opportunities and barriers for the introduction of social tariff for energy. This is a minimum level of cost for those on low income . A social tariff for internet access for low income households is currently available throughout the UK, in some cases it has reduced the bill by 75%, which is a significant saving. If it can be done for internet provision, it surely should be prioritised for heating and electricity.

Q28. Do you have suggestions for how we could improve understanding and awareness of existing tools to enable consumers to manage their energy costs?

- Need to explore how local community networks and partners could be used to share information and raise awareness of existing tools.
- Clearly communicating to consumers that the option of switching suppliers is the key reducing costs is paramount. This could be a key function of the One Stop Shop. Also, increasingly energy suppliers go door to door to prompt customers to change suppliers, this seems to be the most effective way to get customers to switch. Apart from encouraging customers to participate in oil buying clubs there is little that can be done to help customers who depend on oil for space heating.

Q29. How can we support vulnerable people to ensure they are on the most affordable tariff?

- Provision of an impartial, trusted, well publicised and easy to access service to householders to ensure that they are on the best tariff, handholding through any transition if required. In person support should be available with services not completely digitally based as these could exclude groups such as new communities, older people, the significant proportion of people with limited literacy.

Q30. Do you agree that we should explore potential affordability support for populations where energy efficiency measures may not be the right solution? If so, which population groups? Please provide reasons for your answer.

- Yes, we believe that such support would those most in need and help alleviate the widening inequalities.

Q31. Is further research required to identify gaps in non-price protection for different energy users in Northern Ireland? If yes, what should we focus on?

- Yes, we would welcome further analysis of prevalence, barriers and opportunities around non-price protection.

Q32. What are your views on whether government should adopt a common quality assurance standard or framework across all energy efficiency and low carbon heat grant schemes?

- We support the use of common quality assurance standards or framework to encourage uptake of low carbon technologies and to build customer trust. Recent news reports relating to poor installation of retrofit measures in GB risk undermining consumer confidence in NI, The introduction of quality standards and consumer protection could help to address this.

Q33. Do you agree that government should take a common approach to consumer protection across all supported energy efficiency schemes? Please provide reasons for your answer



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- Yes, a common approach to any energy efficiency scheme would be positive as well as a quality standard to ensure any energy efficiency schemes are held to correct standards. Previous energy efficiency schemes without quality standards have proven inconsistent in terms of quality, with work having to be re-done within the supposed lifetime of the product. We support the concept of simple, clear and consistent approach for consumer protection across all supported energy efficiency schemes to encourage uptake and engagement.

### Governance and accountability

Q34. Do you have suggestions about how government could change our use of language to improve buy-in and engagement on fuel poverty?

- We agree that language is critical. 'Warm Homes' is a term that we are increasingly using at Belfast City Council when dealing with the general public– people often don't understand what we mean by low carbon retrofit. We would also commend that we avoid the use of the term poverty – provide information on increasing income and reducing costs in the context of information and support. Use plain English.

Q35. Do you agree that government should take a basket of indicators approach to measuring and understanding fuel poverty?

- Yes, we support the use of a basket of indicators and welcome the proposed use of annual indicators. We recognise shortfalls in the information provided by EPCs, not least, the lack of information around their currency and welcome any measures that can address this in tracking energy efficiency and fuel poverty.

Q36. Are the indicators suggested the correct ones? Please provide reasons for your answer.

- We support the indicators proposed.

Q37. If you agree with the introduction of an indicator based on energy confidence, agency or awareness, do you have suggestions about what kind of indicator might be most valuable?

- The indicator around public awareness/energy confidence will be challenging to measure as some people will want high level information whilst others planning to take a proactive approach may require a fully costed and prioritised home energy report. Any questions posed may need to offer a selection of options.

Q38. Do you agree with our proposal that carbon emissions are not used as a fuel poverty indicator? Please provide reasons for your answer.

- We agree that carbon savings, whilst a valuable metric, are not a reliable indicator of fuel poverty and we welcome the consistent collection of carbon reduction data across any related home energy schemes.

Q39. What is the best way to continue to engage with people experiencing fuel poverty?

- Consult with those suffering fuel poverty directly in the first instance. When not possible consult with community organisations and those organisations already working to support those suffering poverty who are working on the ground and in communities and are acutely aware of the issues faced. More localised knowledge is required as a "one fit for all" regional support scheme at times misses localised issues facing different communities and households. Using LG, VCSE orgs and charities etc as an avenue to administer this support at a local level could be more effective.



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- We would also recommend that engage with established organisations including National Energy Action, the Consumer Council and organisations that support vulnerable groups such as older people, those living with disabilities (including conventional and digital literacy), new communities.

Q40. Do you agree with the proposal for a Fuel Poverty Advisory Group, if not, can you suggest an alternative proposal?

- Yes, we welcome the establishment of a Fuel Poverty Advisory Group.

Q41. If you have any further comments or suggestions not already captured, please provide these in the box below.

- No additional comments.
