



# Response to Consultation

**Date:** 21 September 10  
**Consultation:** Warmer Healthier Homes – a new Fuel Poverty Strategy for Northern Ireland

## Introduction

The Northern Ireland Federation of Housing Associations (NIFHA) represents registered and non-registered housing associations in Northern Ireland. Collectively, our members provide 32,000 good quality, affordable homes for renting or equity sharing. Further information is available at [www.nifha.org](http://www.nifha.org)

## General Comments

The Northern Ireland Federation of Housing Associations welcomes the opportunity to respond to this consultation document. Our members within the Housing Association movement want their tenants and their families to live in warm, comfortable homes and through this contribute to their health and welfare. Our members are pleased that the lowest rate of fuel poverty has been found in Housing Association households (21%, as per the Northern Ireland House Condition Survey 2006) but we recognise that this statistic needs to be reduced and are taking a proactive approach to this.

## Specific Comments

### List of Consultation Questions

*Please give reasons why you agree or disagree with each question.*  
WARMER HEALTHIER HOMES 2010

## Consultation Issue 1

### A fuel poverty index to better target resources

#### 1.1 Do you have any evidence which you wish to submit as part of the examination of the current definition of fuel poverty?

The current definition would have to be reviewed on a UK wide basis. A single definition across UK allows different regions to compare themselves with other regions, therefore enabling constructive benchmarks to be developed and rates of change in one region as compared to another to be measured. It would be unwise therefore to develop a single definition for Northern Ireland as a lot of reliable comparative data would be lost.

#### 1.2 Do you agree with the development of a severity index?

The development of a severity index is welcomed as this should be an indicator of where limited resources should be targeted to have the maximum impact. The government shouldn't abandon the concept of eradicating fuel poverty, NIFHA therefore would not agree to only those households in extreme or severe fuel poverty being given assistance through one of the support schemes.

### **1.3 Do you agree that resources should be targeted at vulnerable households first?**

Of course resources should assist vulnerable households, as a matter of priority, but they shouldn't be the only households targeted. Fuel poverty in some households may eventually lead to them becoming vulnerable whereas if they are assisted, prior to this, they may prevent themselves or their families from becoming vulnerable. Adequate funds need to be set aside and strategies developed to assist in raising all households out of fuel poverty, not just those who are vulnerable.

### **1.4 Do you agree that a severity index should be used to assist in targeting the most vulnerable?**

The severity index should be used as an indicator of whom or where the most vulnerable households are and again whilst it is important to prioritise resources to vulnerable households in extreme fuel poverty it is also important that a strategic viewpoint is also taken in order to prevent an increase in fuel poverty caused by a decrease in income and energy efficiency in people's homes or by an increase in fuel prices.

## **Consultation Issue 2 Improving Energy Efficiency**

### **2.1 Do you agree with a consolidation of the Fuel Poverty Strategy around the aim of improved energy efficiency?**

NIFHA believes that improved energy efficiency in homes is one important aspect of relieving fuel poverty. However good insulation standards and draft proofing will not assist with fuel poverty if a household, as a result of low income or high fuel prices, still cannot heat their homes to an acceptable level. Improved energy efficiency is one solution but account needs to be taken of the other factors that impact on fuel poverty.

### **2.2 Do you agree the Warm Homes Scheme should continue to be our main tool in tackling energy inefficiency in the owner occupied and private rented sector?**

The Warm Homes Scheme has served the owner occupied and private rented sector well and should only be replaced by a better alternative.

### **2.3 Do you agree that the Warm Homes criteria should continue to be used?**

The Warm Homes criteria has served the sector well and should remain as it is at present.

### **2.4 Do you agree that the Northern Ireland Housing Executive Heating Replacement Scheme is an effective tool in tackling energy inefficiency in our social housing stock?**

NIFHA agrees that the NIHE Heating Replacement Scheme seems to be the most effective tool in tackling energy inefficiency in NIHE housing stock. The Heating Replacement Scheme is reliant on appropriate funding to enable it to be effective. Recent years have seen the funding reduced which has implications for the NIHE delivery of this programme.

**2.5 Do you agree that Cosy Homes is the most appropriate way of improving the energy efficiency of the existing Housing Association stock?**

The Cosy Homes scheme has worked well and NIFHA would be keen to see the scheme continue.

**2.6 Are you in favour of a Boiler Replacement Scheme?**

A boiler replacement scheme would be welcome. NIFHA consider that the upgrading of Household boilers would be one way of improving the energy efficiency of a person's home.

**2.7 Do you agree that the scheme should be targeted at boilers rated D or worse?**

The scheme should be targeted at boilers rated D or worse .

**2.8 Do you agree that the Boiler Replacement Scheme should be administered as a grant?**

NIFHA agrees that the Boiler Replacement Scheme should be administered as a grant.

**2.9 Do you agree that, as in the Warm Homes Scheme, the Boiler Replacement Scheme should be available to people living in privately rented houses?**

The same conditions should apply to the Boiler Replacement Scheme as the Warm Homes scheme.

**2.10 If so, do you think landlords should make a contribution to the scheme?**

Landlords should make a contribution if they can afford to they should be subject to a test of resources if they are not in receipt of qualifying benefits.

**2.11 Do you agree that the Department should continue to aim towards Code 4 and 5 so that new social housing is built to the highest possible standard?**

NIFHA's members within Housing Associations aim to build high quality sustainable homes which have a high level of comfort for their tenants. An increased level of subsidy to encourage our members to build to level 4 standards is very welcome but it must be remembered that much of the funding for New Build properties comes from the Housing Association themselves raising private finance to supplement the Housing Association Grant. In some circumstances, whilst the Housing Association may be very willing to build to code level 4 or 5 they may have financial constraints put in place by private lenders.

**2.12 Do you agree that the Department should explore the feasibility of an equity release scheme which would allow homeowners to carry out energy efficiency improvements to their homes?**

NIFHA agrees with the Department exploring the feasibility of an equity release scheme. The three pilot schemes would need careful evaluation prior to a model being developed for Northern Ireland on the basis of the assessment report. It is unclear at this point in time how effective this would be in improving energy efficiency

for vulnerable people as a significant number of these households would be in the social housing and private rented sector.

**2.13 Do you agree that the Department should work with the Department of Finance and Personnel, other departments and agencies to expand the use of the database of Energy Performance Certificates?**

A database of Energy Performance Certificates will allow important information regarding the energy performance of buildings to be gathered and analysed in one location. This information could therefore be used to identify those households or areas in most need and inform future policies to assist households to meet their potential energy rating.

**2.14 Do you agree with that the Department's approach to smart meters should prioritise safeguarding the vulnerable?**

NIFHA welcomes that there is a project that will undertake research on the pilot of the use of smart meters and we will await the outcome of this research prior to making any further comments.

**2.15 Are there any other duties which the Department should pursue in the smart meter domain?**

Smart meters could provide households and suppliers with timely information which could prompt changes to behavioural patterns, therefore encouraging energy saving in homes.

**2.16 Do you agree that the new powers will enable local authorities to produce action plans to improve domestic energy efficiency within their local area?**

The new powers will enable local authorities to produce action plans and should aid the delivery of improvements in domestic energy efficiency at a local level.

### **Consultation Issue 3**

#### **Achieving affordable energy**

**3.1 Do you agree that the Department should continue with its Benefit Uptake campaign to assist households to increase incomes?**

NIFHA recognise the difficulty that Government departments have in maximising the amount of household income. We welcome the Benefit Uptake campaign in conjunction with the Warm Homes initiative but this limits the scope of the scheme to the provision of advice to those people who live in owner occupied dwellings or the private rented sector. NIFHA would advocate that a similar scheme should be available for the provision of advice to tenants within the social rented sector to ensure that all vulnerable people are aware of and claiming their full benefit entitlement.

**3.2 Do you agree that the Department should promote oil stamp savings schemes as a good practice and work with partners to examine the feasibility of a national scheme?**

NIFHA welcomes any scheme which promotes and encourages people to budget effectively for fuel. This is even more so in paying for oil which is expensive when paid for in a lump sum. As well as promoting oil stamp savings the Department

should also encourage initiatives such as oil providers offering enhanced discounts to those customers entering into a direct debit budget programme with them. A fuel brokering scheme by social housing providers could offer economies of scale and reduced fuel costs to tenants.

**3.3 Do you agree that the Department should maintain a watching brief on new green technologies, with a view to rapid uptake of proven cost effective technology?**

There are a number of new initiatives currently being investigated and the Department should keep a watching brief over these. Where there are positive indications of cost effective technology then these should be evaluated with a view to encouraging their greater use.

**3.4 Do you agree that the Department should continue to work with partners including the Utility Regulator and Department of Enterprise, Trade and Industry to explore options for the possible introduction of a social tariff?**

NIFHA agrees that the options for the possible introduction of a social tariff should continue to be explored by the Department. If social tariffs are to be introduced then this should be equitable across all housing tenures.

**Consultation Issue 4  
Consolidating partnerships**

**4.1 As the Department for Social Development has responsibility for the domestic energy efficiency, which is only one component of the fuel poverty equation, do you agree with the emphasis on a partnership approach to tackling all aspects of fuel poverty?**

There should be a joined up Northern Ireland approach to tackling all aspects to fuel poverty as a number of different Departments in Northern Ireland have a role in evaluating, setting the policy and implementing initiatives which will alleviate fuel poverty. There needs to be co-ordination between the partnership groups to ensure that their resources are used effectively. The partnership approach which includes all sectors with an interest in fuel poverty will ensure that all interests are taken account of in this important area of social inclusion.

The strategy must identify which government department will provide the leadership to ensure that the correct measurable targets are set and that progress is monitored against these targets.

**4.2 Do you agree that the types of partnership listed above encompass the most important ones?**

The Home Energy Conservation Authority (HECA) has been omitted from the list and should be included. This is a very important forum under the Chair of NIHE which brings relevant interested groups together to discuss home energy from both an operational and strategic viewpoint.

**4.3 Do you agree that the Department should maintain an active monitoring, evaluation, and research programme to support the development of best practice in the delivery of Strategy?**

Robust research is fundamental to the development of sound evidence based policies; NIFHA agrees that an active research programme should be maintained to inform the future delivery of the strategy.

**4.4 Do you agree that the Department should support housing providers to broker energy at a competitive rate for their tenants?**

NIFHA agrees that, where available, housing providers should be given a choice to broker energy for their tenants at competitive rates.

**4.5 Do you agree that the Department should pilot an area based approach to energy efficiency improvements?**

The Department should evaluate those pilot schemes that have already taken place and should apply them if they are considered to be suitable within the context of Northern Ireland. A balance needs to be determined between providing energy efficiency improvements to dwellings which doesn't ignore the price of fuel and the ability of people, earning low incomes, to buy fuel.

**Submitted on behalf of NIFHA by:**

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