

Response to Consultation

Date: 26 September 2008
Consultation: "Green" Rates Rebates

Introduction

The Northern Ireland Federation of Housing Associations (NIFHA) represents 40 housing associations. This includes 33 of the associations registered and regulated by the Department for Social Development (DSD). Collectively, these associations provide 30,000 good quality, affordable homes for renting or equity sharing. Further information is available at www.nifha.org

Background

Registered housing associations are at the forefront of house-building to high environmental standards. Their new projects are currently required to achieve the Level 3 of the Code for Sustainable Homes and the government intends to "ratchet up" the requirements to Level 6 by 2012. Associations therefore may have more experience of the practical implications than other owners of domestic property in N Ireland.

General Comments

NIFHA strongly supports the government's policy of driving up environmental standards as quickly as reasonably possible. We agree that the domestic rating system offers a useful way of providing incentives for home owners to make progress towards more sustainable living.

NIFHA considers that neither of the two proposed measures would be very effective and recommends an alternative approach.

Specific Comments

1. Achievement of Zero Carbon (Level 6 of the Code for Sustainable Homes) is so demanding compared to current practice that the proposed rates holiday is unlikely to be a significant incentive.
2. The other proposal would give no benefit to property owners who have already invested in energy saving measures. It is also linked to the Energy Efficiency Levy Programme, whose life is uncertain.
3. NIFHA suggests an alternative approach which would give a modest rates discount to the owners of accommodation that is relatively energy efficient. The size of the discount should vary, on a sliding scale, with the energy efficiency of the property, as measured by the Energy Performance Certificates which are currently being introduced. A range of additional, bigger, discounts should be given when the property achieves significant improvements in energy efficiency that are verified by a new EPC. This would provide an incentive for homeowners to:
 - (a) Promptly obtain and make good use of EPCs
 - (b) implement further energy efficiency measures as and when their circumstances permit.

Submitted on behalf of NIFHA by:



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