



<b>Title of Report:</b>	<b>Consultation on a Draft Fuel Poverty Strategy for Northern Ireland</b>
<b>Committee Report Submitted To:</b>	<b>Environmental Services Committee</b>
<b>Date of Meeting:</b>	<b>11<sup>th</sup> March 2025</b>
<b>For Decision or For Information</b>	<b>For Decision</b>
<b>To be discussed In Committee</b>	<b>No</b>

<b>Linkage to Council Strategy (2021-25)</b>	
Strategic Theme	Healthy, Active and Engaged Communities
Outcome	Provide a consultation response
Lead Officer	Head of Health & Built Environment

<b>Estimated Timescale for Completion</b>	
Date to be Completed	N/A

<b>Budgetary Considerations</b>	
Cost of Proposal	N/A
Included in Current Year Estimates	N/A
Capital/Revenue	N/A
Code	N/A
Staffing Costs	N/A

<b>Legal Considerations</b>	
Input of Legal Services Required	<b>NO</b>
Legal Opinion Obtained	<b>NO</b>

<b>Screening Requirements</b>	Required for new or revised Policies, Plans, Strategies or Service Delivery Proposals.		
Section 75 Screening	Screening Completed:	N/A	Date:
	EQIA Required and Completed:	N/A	Date:
Rural Needs Assessment (RNA)	Screening Completed	N/A	Date:
	RNA Required and Completed:	N/A	Date:
Data Protection Impact Assessment (DPIA)	Screening Completed:	N/A	Date:
	DPIA Required and Completed:	N/A	Date:

## **1.0 Purpose of Report**

1.1 The purpose of this report is to provide a Causeway Coast and Glens Borough Council response to the consultation.

## **2.0 Background**

2.1 The Department for Communities (DfC) has launched a consultation on a draft Fuel Poverty Strategy for Northern Ireland which proposes a framework for addressing fuel poverty and its impacts.

2.2 DfC defines fuel poverty is the inability of a household to heat and power their home adequately. It is affected by the cost of energy, the energy efficiency of the home and energy needs of those living in it, and household income. When people cannot heat their homes adequately it can lead to poor mental and physical health.

2.3 This strategy proposes a vision of a Warm, Healthy Home for Everyone, supported by 4 principles. It contains a number of proposed actions that will help us achieve the following objectives to:

1. Make homes more energy efficient
2. Collaborate and build capacity
3. Protect consumers

2.4 The draft Strategy also proposes a new approach to measuring and reporting on fuel poverty and proposals for the Department's new Fuel Poverty Energy Efficiency scheme.

2.5 The full consultation document can be found at: <https://www.communities-ni.gov.uk/consultations/consultation-new-fuel-poverty-strategy-northern-ireland>

2.6 Attached as Appendix 1 is a suggested response to the consultation.

2.7 The initial date for submission of responses was 6<sup>th</sup> March 2025. However, Council has been granted an extension until 12<sup>th</sup> March 2025, with the response subject to subsequent endorsement and approval by full Council.

## **3.0 Recommendation**

It is recommended that Council endorses the response.

## Consultation Response - Fuel Poverty Strategy

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

The Department for Communities' (DfC) vision of warm, healthy homes for everyone, underpinned by the principles of long-term sustainable solutions, collaboration, participation and a needs-based approach, is sound. Causeway Coast and Glens Borough Council supports the concept of a needs-based approach to addressing fuel poverty, which involves identifying households most in need and providing targeted support accordingly. Such an approach is necessary to ensure that those who require assistance get it.

A collaborative approach, where stakeholders such as government agencies, statutory, voluntary and community sectors work together in a meaningful way to produce and implement a NI strategy is key. Collaboration can bring diverse expertise, resources, and perspectives, ultimately leading to more effective solutions and better outcomes.

Participative approaches that effectively engage with households and communities are also important. Building effective partnerships, referral networks and collaboration across all sectors, with meaningful involvement in the planning and decision-making process is necessary to ensure that solutions address actual need and thus are more likely to be successful and sustainable in the long term.

However, it is also important to acknowledge the complexity of fuel poverty and the various factors contributing to it. A multifaceted analysis of these factors and their interactions is required, rather than focusing solely on a needs-based approach.

Ultimately, whether the government vision is effective in addressing fuel poverty will depend on how well it is implemented and the level of commitment and resources allocated to it.

To provide long-term sustainable solutions as an underpinning principle, the strategy should also consider the following:

- Economic factors - The strategy and implementation plan must be sufficiently flexible and responsive to take into account changes in energy prices, the economy, and other factors that can impact household income and energy expenditure.
- Social factors - Addressing fuel poverty often requires addressing underlying social issues such as inequality, and social exclusion.
- Environmental/educative factors - Encouraging energy efficiency, use of renewable energy, and reducing energy consumption can help mitigate the effects of fuel poverty and contribute to a more sustainable future.
- Monitoring and evaluation – regular and timely monitoring and evaluation of the strategy's effectiveness will help identify areas for improvement and ensure that adjustments are made as needed to ensure that the strategy remains flexible and fit for purpose
- Political factors – the political will to work collaboratively to agree a budget and work cross departmentally and with partners such as local government to deliver positive outcomes.

In summary, the DfC's vision and underpinning principles for tackling fuel poverty are sound in theory, but the effectiveness of the strategy will depend on its implementation, the level of commitment, and the incorporation of a comprehensive and multifaceted approach that adequately addresses the various factors contributing to fuel poverty.

## **Question 2: Do you agree with the timeframe and review period? If not, why not?**

Causeway Coast and Glens Borough Council agrees that the 10-year strategy focus period from 2025-2035 with a 5-year review in 2030 seems a reasonable period to allow for planning and delivery.

## **Question 3: What would a readily understandable and measurable definition of 'thermal comfort' look like?**

*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 Part F1 (Conservation of fuel and Power) of the Building Regulations (NI).
- The provision and maintenance of adequate ventilation of domestic dwellings as identified by the standards of Part K (Ventilation) of the Building Regulations (NI).

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.

**Question 4: For Minimum Energy Efficiency Standards in the private rented sector 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:

- **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.

**Question 5: Should Minimum Energy Efficiency Standards also be applied to other tenures? Please give reasons for your answer.**

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.
- **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.

**Question 6: Do you agree that introducing updated fitness standards will contribute to making homes more energy efficient? Please provide reasons for your answer**

Causeway Coast and Glens Borough Council are of the view that 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 Part 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.
- 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.
- 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. Resources both practical and financial must be provided to 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.

**Question 7: Do you agree that all government domestic energy schemes should take account of the Fuel Poverty Strategy principles?**

Causeway Coast and Glens Borough Council agree that all government domestic energy schemes should take account of the Fuel Poverty Strategy principles.

**Question 8: Do you agree that DfC should take a more flexible approach that considers current data when setting and reviewing:**

- a) Income thresholds and**
- b) Eligibility criteria?**

**Please give reasons for your answer.**

Causeway Coast and Glens Borough Council agree that a more flexible approach that considers current data when setting income thresholds and eligibility criteria for energy grant schemes, would be beneficial, for the following reasons:

- **Dynamic Economic Conditions:** Economic situations can change rapidly due to various factors, including inflation, job market fluctuations, and other socioeconomic challenges. A flexible approach to income assessment and eligibility criteria allows for assessment and adjustment based on the most recent data, ensuring that schemes remain relevant and supportive of those in need.
- **Targeted Support:** By using up-to-date data, DfC can more accurately target support to those who need it most. For instance, individuals or families who may not have qualified under outdated thresholds could be struggling and in need of assistance.
- **Encouraging Participation:** More inclusive and adaptive eligibility criteria could encourage a wider range of participants to engage in energy efficiency programmes, leading to greater overall impact. When people see that a scheme considers current realities, they may be more likely to apply.
- **Efficient resource allocation:** Continuously reviewing eligibility criteria can help ensure that financial and policy resources are allocated efficiently and effectively, avoiding waste and ensuring that assistance reaches the intended recipients.
- **Promoting equity:** A flexible approach can assist in addressing inequalities faced by different communities. By being responsive to data reflecting disparities, DfC can design a scheme that promote equal opportunities for energy efficiency upgrades.
- **Moving to a regional rather than local approach to promote “worst first”** where evidence suggests this is necessary to aid those most in need.

Overall, a flexible, data-informed and evidence led approach to income thresholds and eligibility criteria in energy grant schemes can lead to more effective and equitable outcomes.

**Question 9: Do you agree that an income threshold should increase in line with minimum wage levels/inflation or another index such as Retail Price Index (RPI) to mitigate increases in the cost of living? Please give reasons for your answer.**

Causeway Coast and Glens Borough Council favour increasing income thresholds for energy efficiency grant schemes in line with the retail price index (RPI) as a beneficial policy response to mitigate the impact of rising living costs rather than minimum wage/inflation, for the following reasons:

- **Expanded Accessibility:** Raising income thresholds in line with RPI would allow more individuals and families who are struggling with energy costs to access grants, thus alleviating financial pressure.
- **Alignment with Cost of Living:** As living costs rise, adjusting thresholds in line with RPI helps ensure that support measures remain relevant and effective in helping those in need.



- **Supporting Vulnerable Populations:** By updating income thresholds in line with the RPI, DfC can ensure that low-income households, who are often disproportionately affected by energy costs, receive the assistance they need.

It is however recognised that there are identifiable constraints with this approach.

- **Budget Constraints:** Expanding eligibility in line with the RPI may increase the financial burden on public funds, necessitating careful consideration of budget allocations and the sources of funding for these schemes.
- **Potential for over-qualification:** If thresholds are raised too high, it may allow individuals who are not in genuine need of assistance to access grants, potentially diluting the impact of the scheme.
- **Measurement of effectiveness:** It's important to have mechanisms in place to regularly evaluate the impact of policy decisions on energy efficiency uptake and overall cost savings.

Increasing income thresholds for energy efficiency grant schemes in line with RPI could be an effective measure to support households facing rising living costs and promote energy efficiency. However, it requires careful evaluation of funding mechanisms and ongoing assessment of the programme's effectiveness. Balancing support for vulnerable populations while ensuring efficient use of public resources is key to a successful implementation. Any modifications to schemes should be considered on a reasonable frequency and an agile approach, with clear guidance on how these changes can positively impact those who are already on any eligibility waiting list.

**Question 10: 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, Causeway Coast and Glens Borough Council believe the Energy Performance Certificate (EPC) rating of a house should be considered as part of the eligibility criteria for an energy grant scheme. The following reasons supporting this approach:

- **Targeting Inefficiency:** Focusing on homes with the lowest EPC ratings ensures that resources are directed towards those properties that are the least energy efficient. This prioritisation can lead to reductions in energy consumption, thus making a more substantial impact on fuel poverty and ultimately climate change.
- **Maximising Impact:** By targeting the least efficient homes first, grant schemes can achieve better outcomes in terms of energy savings. Improving the efficiency of low-rated homes can lead to drastic improvements in energy use compared to already reasonably performing homes, offering greater returns on investment.
- **Addressing fuel poverty:** Homes with poor EPC ratings are often associated with lower-income households that struggle with high energy bills. By prioritising these properties, grant schemes can alleviate financial strain on vulnerable populations, contributing to social equity in energy access.
- **Compliance with policy goals:** UK have set ambitious targets for reducing carbon emissions and improving overall energy efficiency. Using EPC ratings to guide grant distribution aligns with these policy objectives by ensuring that efforts to enhance building efficiency are strategically focused
- **Encouraging upgrades:** Providing grants to improve the EPC ratings of the least efficient homes may encourage homeowners and landlords to invest in necessary upgrades. This could stimulate the green economy, creating jobs in energy retrofitting and construction.

- **Regulatory alignment:** Many countries are already incorporating energy performance into building regulations and financial incentives. Including EPC ratings in grant scheme eligibility criteria aligns with existing frameworks, making the strategy more coherent and easier to implement.
- **Improving Property Value:** Energy efficiency improvements can enhance the value of properties. By improving the worst-rated homes first, grant schemes can help increase property values in areas that may have been economically stagnant, leading to broader community revitalisation.

In conclusion, considering EPC ratings as part of eligibility criteria for energy grant schemes not only addresses immediate energy inefficiencies but also aligns with broader social and environmental goals. It enables more effective allocation of resources while fostering sustainable development and energy equity.

**Question 11: Do you agree that the new Affordable Warmth Scheme should take a Whole House retrofit approach? Please give reasons for your answer.**

Yes, Causeway Coast and Glens Borough Council are of the opinion, with careful implementation, taking a whole house retrofit approach to energy efficiency measures can be highly effective for several reasons:

- **Comprehensive solutions:** A whole house approach considers the interconnectedness of various building systems (heating, cooling, insulation, ventilation, etc.) rather than addressing individual components in isolation. This can lead to more effective and holistic energy savings
- **Increased energy savings:** By optimising the entire home's energy performance, homeowners can achieve greater energy savings than through piecemeal upgrades. This can significantly reduce energy bills and increase thermal comfort.
- **Enhanced Thermal Comfort:** Improvements made through a whole house approach can enhance indoor air quality, reduce drafts, and maintain more consistent temperatures, resulting in a more comfortable living environment.
- **Long-Term value:** Investing in comprehensive retrofits can improve the overall value of the property by enhancing its energy efficiency and sustainability, making it more attractive to potential buyers.
- **Environmental benefits:** By reducing energy consumption, retrofitting homes can contribute to climate change mitigation efforts.
- **Economic Growth:** A push for whole house retrofits can spur job creation in the construction and home improvement sectors, promoting local economies.
- **Accessibility and Equity:** Implementing a whole house approach through government initiatives can help low- and moderate-income households access energy efficiency upgrades that they might not be able to afford otherwise.

In summary, a whole house retrofit strategy can lead to significant environmental, economic, and social benefits, making it a compelling approach for DfC policy on tackling fuel poverty. However, a one size does not fit all, and there will be circumstances where this approach will not work (see Question 12 overpage).

**Question 12: 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.**

The idea of a "whole house approach" in government energy efficiency grant schemes emphasises a comprehensive strategy to improve the energy performance of a home. Causeway Coast and Glens Borough Council are of the opinion that under this approach, *all* recommended measures should ideally be installed to maximise benefits. While a "whole house approach" can dramatically enhance the effectiveness of energy efficiency initiatives, making all recommended measures mandatory without exceptions may not be practical or feasible for every homeowner.

Reasons for Allowing Exceptions:

- **Financial Constraints:** Homeowners may face limitations, particularly if the upfront costs of all recommended measures are prohibitive. Providing flexibility allows participants to prioritise based on financial capability.
- **Property-specific conditions:** Each home is unique, and some measures may not be suitable due to structural limitations or existing conditions such as solid wall construction, design and physical footprint or construction type that can make a whole house approach financially prohibitive.
- **Homeowner preferences:** Homeowners may have specific preferences or priorities based on their lifestyle or needs that could lead them to opt out of certain measures. For example, the need for internal drylining may require the redecoration of each and every room affected, or elderly householders are often unable to clear out their roof space used as a storage area, to allow for the fitting of roof insulation. This can result in homeowners who are in need, rejecting the progress of the improvement works. Such scenarios should be considered on a case-by-case basis to avoid the vulnerable elderly population in particular, from being excluded or excluding themselves, from a scheme due to practical constraints.
- **Appropriate prioritisation:** Not all measures may yield equal benefits in all homes. A focused approach could consider the most critical improvements that provide the best return on investment in terms of energy savings. Consideration of a prioritisation of measures as identified in previous schemes should be introduced in a specific order that align to most effective thermal benefits for the home. This could also be used to help determine exceptions to a whole house approach.
- **Potential problems during installation:** In some instances, recommended measures may reveal or lead to other issues (like mould or structural damage) that could complicate a full installation. In such cases, exceptions or staged installations may be necessary.

Rather than insist on a whole approach only, it would be beneficial to encourage comprehensive upgrades while allowing some level of flexibility to address individual circumstances. This balanced approach could promote participation in grant schemes while still achieving significant energy efficiency improvements.

**Question 13 Do you agree that the new scheme should prioritise low carbon heating solutions where possible?**

Yes, Causeway Coast and Glens Borough Council agree the new Affordable Warmth Scheme should prioritise low-carbon heating solutions where possible, for the following reasons:

- **Climate Change Mitigation:** Low-carbon heating solutions, such as solar, heat pumps, and biomass, play a crucial role in reducing greenhouse gas emissions and mitigating climate change. By transitioning to low-carbon heating, governments can help meet their climate

change mitigation targets and reduce their carbon footprint. It is essential that low-carbon solutions are only used where suitable, as they may be ineffective in certain property types. For example, heat pumps will only be effective and efficient as a home heating method in a well-insulated property, and their use may therefore be very limited in households impacted by fuel poverty.

- **Air Quality Improvement:** Northern Ireland still relies heavily on fossil fuels as a home heating source which can lead to air pollution, negatively impacting public health. Low-carbon heating solutions, on the other hand, produce little to no greenhouse gas emissions and air pollutants, resulting in improved air quality.
- **Renewable energy integration:** Prioritising low-carbon heating helps integrate renewable energy sources into the energy mix. This can contribute to a more diversified energy supply, reducing dependence on fossil fuels and promoting energy security.
- **Energy Efficiency:** Low-carbon heating solutions often require less energy to operate than traditional heating systems. This can lead to cost savings for households and reduce strain on the grid during peak demand periods.
- **Economic benefits:** Investing in low-carbon heating solutions can create new economic opportunities, such as jobs in the renewable energy sector, and stimulate local economies. Additionally, the long-term savings from reduced energy consumption can have a positive impact on a region's economic growth.
- **Public Health benefits:** Exposure to air pollution from fossil fuel-based heating can have significant health impacts. By promoting low-carbon heating solutions, this can contribute to a reduction in respiratory diseases and other health problems associated with air pollution.

To prioritise low-carbon heating solutions effectively, the fuel poverty strategy for NI should consider:

- Incentivising low-carbon heating options through grants, subsidies, or low-interest loans for households (and businesses).
- Developing and implementing policies that support the deployment of low-carbon heating technologies, such as building control standards that promote energy efficiency.
- Investing in energy grid modernisation to ensure that it can accommodate increased adoption of low-carbon heating solutions.
- Providing education, training and awareness raising programmes to ensure that individuals have the knowledge and skills to select, install and maintain low-carbon heating systems.
- Encouraging public-private partnerships to accelerate the development and deployment of low-carbon heating technologies.

**Question 14: 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 give reasons for your answer**

Yes, Causeway Coast and Glens Borough Council support this approach:

- **Economic Relief and Energy Independence:** Low-income households often struggle with energy costs. By offering renewable technologies, the government can help reduce their reliance on conventional energy sources, thereby potentially lowering their monthly energy bills. Solar panels and battery storage empower households to generate and store their own energy. This independence can shield low-income families from fluctuating energy prices and provide a more stable financial situation.
- **Environmental Benefits:** Transitioning to low carbon heating solutions and renewable technologies is crucial for the UK's climate goals. By promoting these solutions, the

government can help reduce greenhouse gas emissions, contributing to combating climate change and improving air quality.

- **Job Creation:** Investment in renewable technologies can spur job creation in the green energy sector. This includes opportunities in manufacturing, installation, and maintenance, which can benefit both low-income communities and the broader economy.
- **Public Health:** Low carbon heating solutions and renewable energy can help reduce pollution, leading to better air quality and improved public health outcomes. This is particularly important in low-income areas that may experience higher levels of air pollution and related health issues.
- **Social Equity:** By prioritising access to renewable technologies for low-income households, the strategy can address fuel poverty and promotes social equity. Ensuring that all households, regardless of income, can benefit from clean energy solutions is fundamental to a fair transition.
- **Long-term Savings:** While the initial investment in renewable technologies may be a barrier, government support through grant schemes can facilitate access. Over time, these technologies can lead to substantial savings on energy costs, making them a financially viable option for low-income households.
- **Incentives for Adoption:** By providing incentives for renewable technologies in low-income households, the government can drive greater adoption of low carbon solutions, accelerating the transition to a sustainable energy future.
- **Community Resilience:** Renewable technologies and low carbon heating solutions can enhance resilience in communities, especially during energy supply disruptions or price spikes. Increased self-sufficiency is vital for vulnerable populations.

In summary, offering renewable technologies to low-income households aligns with economic, environmental, and social justice goals. It provides an important pathway for these communities to engage with and benefit from the transition to a low-carbon economy.

**Question 15: Do you agree that rural properties should be prioritised for energy efficiency support? Please give reasons for your answer.**

In general, Causeway Coast and Glens Borough Council are of the opinion that priority should be based on need and the “worst first” principle rather than geographical location. Whether a 10-year strategy should prioritise rural properties for energy efficiency support involves several considerations, and there are compelling arguments for and against such prioritisation. Here are some reasons to support prioritising rural properties:

- **Ageing Infrastructure:** Many rural homes are older and may lack modern energy-efficient features. ‘Hard to Treat’ homes with solid wall construction are typically located in rural areas. Targeting these properties for support can lead to significant reductions in energy consumption, lowering utility bills and improving overall energy efficiency in the region.
- **Access to Resources:** Rural areas may have limited access to resources such as the gas network distribution system that support energy efficiency improvements. By prioritising these areas, governments can directly address systemic inequities and ensure that rural residents have the same opportunities to benefit from energy efficiency programs as those in urban areas.
- **Environmental Impact:** Improving energy efficiency in rural properties can contribute to broader environmental goals, such as reducing greenhouse gas emissions and reliance on fossil fuels. Rural areas often have significant agricultural activities, and enhancing energy efficiency can lead to lower carbon footprints and promote sustainable practices.

- **Reducing Strain on Energy Grids:** Energy-efficient rural properties can reduce overall demand for energy, which can help alleviate strain on national energy grids. This is particularly important during peak energy usage times when rural areas may face higher costs or energy shortages.
- **Local Economic Growth:** Supporting energy efficiency retrofits can create local jobs in construction, skilled trades, and energy audits. Prioritising rural areas can stimulate local economies and promote sustainable economic development.
- **Resilience and Self-Sufficiency:** By enhancing energy efficiency, rural properties can become more resilient against energy price volatility and disruptions.

However, it is also important to consider counterarguments, such as the possibility of neglecting urban areas that might need similar support or the logistics and costs associated with implementing programs in sparsely populated areas. Ultimately, an effective approach will involve a balanced strategy that assesses and addresses the specific needs of both rural and urban properties based on sound evidenced-based analysis.

**Question 16: Do you agree with a sliding scale approach to funding for home energy schemes?**

Causeway Coast and Glens Borough Council agrees with this approach. A sliding scale approach to funding home energy schemes can be beneficial for several reasons:

- **Affordability:** It allows for a more equitable distribution of funds, ensuring that those who can least afford to invest in energy efficiency get more support. It also aligns with the public health approach of ‘proportionate universalism’ where actions are universal but the scale and intensity of is proportionate to the level of disadvantage.
- **Incentivising Participation:** A sliding scale can encourage broader participation by providing greater incentives for those who might be hesitant to invest in energy improvements due to cost concerns.
- **Targeted Assistance:** It enables the allocation of resources based on specific needs and circumstances, addressing barriers faced by different sectors of the population.
- **Improved Energy equity:** It can contribute to reducing fuel poverty, ensuring that energy-efficient homes are accessible to all socio-economic groups
- **Flexibility and responsiveness:** A sliding scale approach can be adjusted over time based on changing economic conditions or energy markets, making it a more dynamic and responsive funding strategy.

However, there are also challenges to consider:

- **Cost and complexity:** Implementing a sliding scale may require more administrative oversight and could complicate the funding process.
- **Potential for misuse:** There may be concerns about ensuring that the funds are used appropriately and that those who truly need assistance are receiving it.
- **Balancing Interests:** It's important to balance the needs of different stakeholders, including taxpayers, homeowners, and energy providers.

Overall, if carefully designed and implemented, a sliding scale approach can enhance the effectiveness of home energy schemes and promote sustainability while addressing social equity concerns. The success of such an approach would depend on transparent criteria, robust oversight, and effective communication and support for the target population.

**Question 17: 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?**

While loans can be a viable financing option for landlords seeking to improve the energy efficiency of their properties, they may not always be the fairest or most suitable solution for every situation.

Here are some considerations and alternative funding options:

Considerations for Loans:

- **Repayment Burden:** Loans require repayment with interest, which may be burdensome for landlords, especially if cash flow is tight.
- **Creditworthiness:** Access to loans can depend on a landlord's creditworthiness, potentially excluding those with less favourable financial backgrounds.
- **Market Variability:** Interest rates can fluctuate, affecting the overall cost of borrowing.

Alternative Funding Options:

- **Match funding grants:** These funds do not require repayment, making them a more accessible option for many landlords. However, 50% grant funding has been available to landlords for some years through the current Affordable Warmth Scheme, but unfortunately to date uptake has been stubbornly low (5-8%). DfC must first conduct research to uncover the reasons behind poor uptake before considering a similar roll out.
- **Incentives and rebates:** Offering incentives such as rates rebates could encourage landlords to undertake energy efficiency improvements.
- **Repayment Programmes:** Implemented on-bill financing programmes that allow landlords to finance energy improvements through their rates or utility bills can linking repayment directly to energy savings.
- **Public-Private partnerships:** Collaborations between government departments and private firms can provide funding, expertise, and shared risk for large-scale energy efficiency projects.
- **Energy Performance contracts:** These agreements allow landlords to partner with energy providers to implement energy-efficient upgrades with financing based on the savings realised from reduced energy bills.
- **Community partnerships:** Collective funding programmes can enable individuals or communities to finance energy-efficient improvements through contributions from a large number of people.
- **Introduction of claw back options** where grant-aided households are sold after securing the improvements or where the eligible tenant renting the improved dwelling moves on within a defined period of time.

While loans can be an effective means to finance energy efficiency improvements, they aren't necessarily the fairest or most accessible for all landlords. A multifaceted approach that includes grants, incentives, and innovative financing models may provide a more equitable and supportive framework for property owners addressing energy efficiency upgrades.

**Question 18: 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 your answer.**

Causeway Coast and Glens Borough Council do not agree that consideration should be given to increasing levies from electricity bills to fund energy efficiency schemes for low-income households.

It is thought that implementing such a policy would:

- Increase costs for consumers: Higher levies on electricity bills may lead to increased costs for consumers, which could exacerbate fuel poverty, particularly for those already struggling to pay their energy bills.
- Have a regressive impact: Energy bills are often seen as a regressive tax; thus, increasing levies could exacerbate inequality if not carefully designed to protect the most vulnerable.
- Create equity concerns: Some critics argue that a levy-based approach may place an unfair burden on certain consumers, such as those who are not eligible for energy efficiency schemes or those with limited access to energy-efficient technologies.
- Have administrative complexities: Implementing and managing a levy-based system can be complex and may involve significant administrative costs, which could eat into the budget allocated for energy efficiency schemes.

**Question 19: Should we explore introducing levies on gas to increase funding for such energy efficiency measures? Please provide reasons for your answer**

Causeway Coast and Glens Borough Council do not agree that consideration should be given to exploring the introduction of levies on gas bills to increase funding for such energy efficiency measures.

It is thought that implementing such a policy would:

- Increase costs for consumers: An introduction of levies on gas bills may lead to increased costs for consumers, which could exacerbate fuel poverty, particularly for those already struggling to pay their energy bills.
- Have a regressive impact: Energy bills are often seen as a regressive tax; thus, introducing additional levies could exacerbate inequality if not carefully designed to protect the most vulnerable.
- Create equity concerns: Some critics argue that a levy-based approach may place an unfair burden on certain consumers, such as those who are not eligible for energy efficiency schemes or those with limited access to energy-efficient technologies.
- Increase administrative complexities: Implementing and managing a levy-based system can be complex and may involve significant administrative costs, which could eat into the budget allocated for energy efficiency schemes.

**Question 20: What are your thoughts on exploring any revenue-raising opportunities for energy efficiency schemes from unregulated heating sources such as home heating oil?**

Causeway Coast and Glens Borough Council do not believe that consideration should be given to exploring revenue raising opportunities for energy efficiency schemes from unregulated heating sources such as home heating oil.

NI is currently still more reliant on home heating oil than other parts of the UK. It is thought that implementing such a policy would have a higher impact on those who are most at risk of being in fuel poverty. Such a policy would:

- Increase costs for consumers: An introduction of levies on oil bills may lead to increased costs for consumers, which could exacerbate fuel poverty, particularly for those already struggling to pay their energy bills.
- Regressive impact: Energy bills are often seen as a regressive tax; thus, introducing additional levies could exacerbate inequality if not carefully designed to protect the most vulnerable.



- Equity concerns: Some critics argue that a levy-based approach may place an unfair burden on certain consumers, such as those who are not eligible for energy efficiency schemes or those with limited access to energy-efficient technologies.
- Administrative complexities: Implementing and managing a levy-based system can be complex and may involve significant administrative costs, which could eat into the budget allocated for energy efficiency schemes.

**Question 21: Do you agree that we should utilise and build referral pathways between Government, Local Government, health professionals and the Voluntary and Community Sector? If yes, how can we best achieve this?**

Yes, Causeway Coast and Glens Borough Council are of the opinion that building referral pathways for people needing advice and support is absolutely essential for creating a comprehensive support system to enhance overall community well-being, particularly for vulnerable populations who may struggle with energy-related issues. There does however need to be clear leadership with one organisation responsible for delivering the scheme.

Effective collaboration is critical to ensuring that those struggling with fuel poverty are provided with accessible and timely assistance. The skills and competencies of partnership working can help through the local knowledge, emotional intelligence and trust building capabilities of staff who can be the conduit between the scheme and eligible customer connectivity.

To achieve this effectively, the NI fuel poverty strategy must ensure

- Effective stakeholder engagement at all stages of planning and implementation: Involve all relevant stakeholders from the outset, including government agencies, health professionals, and VCS representatives, to ensure their insights and needs are considered. Regular meetings and workshops can facilitate collaboration and build trust among partners.
- Shared Goals and objectives: Develop a clear framework outlining shared goals, objectives, and outcomes for the referral pathways. This can help ensure that all parties are aligned and working towards common aims, such as reducing fuel poverty and improving health outcomes.
- Training and awareness: Conduct training sessions for health professionals and VCS workers on the energy advice available, common energy-related issues faced by clients, and how to refer individuals effectively. This will empower them to recognise when someone needs support and know where and how to direct them.
- Integrated information systems: Establish a centralised information system or platform where stakeholders can easily access resources, share information, and track referrals. This can help ensure consistency in service delivery and facilitate communication between different sectors.
- Clear referral processes: Develop clear, user-friendly referral procedures that outline how individuals can be referred between sectors. This should include a simple process to follow and the types of information required for referrals.
- Community engagement: Implement community engagement programmes to raise awareness about available resources and support channels. This could include workshops, informational sessions, or partnerships with local organisations or community groups that engage with residents.
- Feedback and evaluation: Create mechanisms for regular feedback and robust evaluation to assess the effectiveness of the referral pathways. Analyse data on referrals made, support outcomes, and areas for improvement to refine the process continuously.

- Focus on accessibility: Ensure that the referral pathways are accessible and inclusive, addressing potential barriers such as language, mobility, and technological access. Tailor services to meet the diverse needs of the community.
- Data Sharing agreements: Establish data sharing agreements among partners to facilitate information exchange while ensuring data privacy and security. This can help improve the understanding of community needs and enhance service provision.

**Question 22: Do you agree with a taskforce/working groups to develop enabling frameworks for energy communities**

Causeway Coast and Glens Borough Council strongly support the appointment of a taskforce with clear timescales for action, and representation from industry, councils, communities etc to develop enabling frameworks for community energy. A taskforce or working group can be an effective way to bring together diverse stakeholders, including community representatives, experts, and decision-makers, to co-create and implement such frameworks. Enabling frameworks can help communities overcome specific challenges and barriers by providing a structured approach to addressing them.

This can include:

1. Facilitating dialogue and collaboration among stakeholders
2. Identifying and mapping community strengths and resources.
3. Developing tailored interventions and strategies
4. Enhancing community engagement and participation.
5. Building capacity and resilience within communities.
6. Developing and refining the frameworks based on community needs and priorities
7. Ensuring that frameworks are inclusive, sustainable, and responsive to the evolving needs of communities.

**Question 23: Do you agree that government should assess the most relevant recommendations of the NICE6 guidelines and consider their implementation**

Yes, Causeway Coast and Glens Borough Council agree, implementation of the NICE6 guidelines will increase awareness within the health, care and voluntary sectors of how health problems caused or exacerbated by cold homes can be addressed through appropriate referrals, training and identifying needs as well as ensuring people are discharged from hospital to a warm home.

**Question 24: Do you agree that we should work with organisations that provide emergency support, to seek a consistent approach across NI and the inclusion of a referral to a long-term solution. If so, what would be the best way to achieve this?**

Yes, Causeway Coast and Glens Borough Council, agree that the government should collaborate with organisations providing emergency energy support, such as local councils and the Public Health Agency, to establish a consistent approach and facilitate referrals to long-term solutions. This collaboration can help ensure that people in need receive not only immediate assistance but also sustainable support.

**Question 25: 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?**

There are compelling arguments to continue to provide emergency financial support in the short term, at least until a time when there is data gathered about who is most in need and allow prioritisation. These include

- Flexibility and responsiveness: Discretionary support can be more adaptable to changing circumstances and can be tailored to meet immediate needs of individuals or families facing financial distress.
- Targeted assistance: It allows agencies to quickly direct funds to those who are most in need without waiting for extensive data collection, which can be time-consuming.
- Prompt Relief: In times of crisis, immediate financial support can prevent people from falling into deeper financial hardship, homelessness, or inability to afford basic necessities.

However, the disadvantages of this approach are clear:

- Risk of inequity: Without robust data, there's a potential risk that support may not reach the most vulnerable populations, as decisions could be influenced by subjective criteria or less visible needs.
- Sustainability concerns: Discretionary funding may be limited in scope or duration, potentially leading to gaps in support once the initial funds are depleted. Clear criteria would be essential if there are to be any discretionary funds allocated.
- Lack of comprehensive strategy: Prioritising discretionary support might detract from the development of a more systematic approach that looks at the root causes of financial crises and provides longer-term solutions.

**Question 26: 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?**

Causeway Coast and Glens Borough Council agree, the proposal to analyse the impact of withdrawing Winter Fuel Payments from pensioners above the pension credit threshold is essential as it acknowledges the diverse financial situations pensioners face. Many pensioners, even those above the threshold, may struggle with heating costs, particularly during harsh winters. A thorough assessment could provide insights into how this policy affects vulnerable groups and inform future decisions. Additionally, introducing additional support where appropriate would ensure that those who are still in need receive assistance, promoting fairness and social equity.

If there are concerns, alternatives could include:

- Income assessments: Instead of a blanket withdrawal based on the pension credit threshold, a more nuanced approach could consider individual circumstances, such as other sources of income or cost of living considerations.
- Targeted support programmes: Establish specific programmes that target lower-income pensioners who may be less able to afford heating costs, ensuring that support goes to those most in need.
- Emergency Funds: Creating an emergency fund that pensioners can access during particularly cold periods could alleviate financial strain without entirely withdrawing support.

- Broadening eligibility: Instead of withdrawing payments, consider gradually tapering them based on income levels, allowing for a smoother transition and minimising the impact on those who may just exceed the threshold.

Overall, it is essential to balance fiscal responsibility with the need to support vulnerable populations, ensuring that all pensioners can maintain a comfortable and safe living environment during the winter months.

**Question 27: Do you agree that we should improve our understanding of the impacts of energy decisions on the energy bills of different consumer groups? If so, what would be the best way of understanding these impacts?**

Yes, Causeway Coast and Glens Borough Council agree that improving our understanding of the impacts of energy decisions on the energy bills of different consumer groups is crucial.

Understanding these effects can help policymakers design more equitable energy policies and ensure that no particular group bears an undue financial burden.

The best ways to understand these impacts include:

- Sound evidence base: Collect and analyse data on energy consumption patterns across different demographic groups, including income levels, geographic locations, and household sizes. This could involve utilising smart meter data, historical energy use data, and bill payment histories to assess how different policies or energy prices would affect various groups.
- Consumer segmentation: Identify and segment consumer groups based on factors such as income, energy usage, and access to renewable energy sources. This segmentation can help in predicting how changes in energy pricing will affect sector-specific demographics.
- Surveys and focus groups: Conduct surveys and focus groups to gather qualitative insights from consumers about their energy usage, the impacts of energy bills, and the willingness to adopt energy-saving technologies or practices. Understanding consumer preferences can shed light on how policies could impact their bills.
- Modelling and simulation: Use econometric models to simulate the impacts of different energy policies on consumer bills. This could include modelling scenarios like carbon pricing, changes in subsidies for renewable energy, or alterations in energy market structures.
- Pilot programmes: Implement pilot programmes aimed at specific consumer groups to measure the impacts of particular energy policies or decisions before rolling them out on a wider scale.
- Collaboration with utilities: Work closely with utilities, consumer advocacy groups etc to get a holistic view of the consumer impacts. These organisations often have valuable insights and data on consumer behaviour and challenges.
- Transparency and reporting: Ensuring that energy decision-makers provide transparent reports on how decisions affect various consumer groups, with accessible breakdowns of potential financial impacts, can foster a better understanding within the community.
- Feedback and evaluation mechanisms: Create channels for ongoing feedback from consumers regarding their experiences with energy pricing and policies, which can inform future policy adjustments.

By combining quantitative data with qualitative insights and consumer feedback and evaluation, policymakers can develop a comprehensive understanding of how energy decisions impact different groups and work towards more equitable energy solutions.

## **Question 29: How can we support vulnerable people to ensure they are on the most affordable tariff?**

Government can implement a variety of strategies to assist vulnerable individuals in accessing the most affordable energy tariffs. Here are several approaches:

- **Information and education campaigns:** Launch campaigns to educate vulnerable populations about available energy tariffs and programs, helping them understand how to select the most cost-effective options. Provide resources in multiple languages and formats to ensure accessibility.
- **Tariff Comparison Tools:** Develop or support online platforms where individuals can easily compare energy tariffs from different suppliers. This can include filters for special rates for low-income households.
- **Subsidies and financial assistance:** Provide direct financial assistance or subsidies to low-income households to help cover energy costs, ensuring they can afford the best tariffs. Implement programmes that automatically enrol eligible households in low-income energy assistance programmes.
- **Partnerships with Energy Companies:** Collaborate with energy providers to create special tariffs or discounts for vulnerable people, such as elderly citizens, low-income families, or those on disability support. Encourage energy companies to offer simplified processes for vulnerable groups to determine their eligibility for lower tariffs.
- **Consideration needs to be given to the role of the Utility Regulator to monitor the energy companies in ensuring lowest tariffs are given to vulnerable groups.**
- **Engagement programmes:** Deploy community engagement initiatives to connect with at-risk populations and help them navigate energy services. This can include partnerships with local councils who already work locally to assist vulnerable families in applying for energy programmes and understanding their options.
- **The revision of the arms' length service that was introduced by the DfE 'One stop shop' as it is not thought to be as accessible or user friendly for certain sectors such as the elderly who don't have the confidence or family support to navigate the system. These are often the sectors that need the most assistance.**
- **Legislative measures:** Introduce legislation or policies that prioritise affordable energy access for vulnerable populations, including limits on energy shut-offs during extreme weather. Ensure that consumer protection laws are in place to prevent exploitative practices targeting low-income households.
- **Data Sharing and referrals:** Utilise data sharing agreements (with privacy protections) to identify individuals who may qualify for assistance, enhancing outreach efforts. Create referral programmes between social services and energy providers to seamlessly connect vulnerable individuals to financial assistance and resources.
- **Crisis support services:** Establish or bolster emergency assistance programmes for energy disconnection to support individuals facing immediate crisis situations. Set up hotlines or helplines for individuals to receive immediate advice and support regarding energy billing and concerns.
- **Monitoring and evaluation:** Continuously monitor and evaluate the effectiveness of programmes aimed at helping vulnerable populations with energy tariffs to ensure they meet their goals and adjust as necessary.

By implementing these measures, government can significantly improve access to affordable energy for vulnerable citizens, reducing their financial burdens and enhancing their overall well-being.

**Question 30: 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, Causeway Coast and Glens Borough Council agree that this is an area that requires exploration.

There are potential population groups who may require additional and targeted specific support. These could include low-income households living with a terminal illness, or long-term disability or dementia which requires the usage of specialised medical equipment and considerations from ethnic minority groups or those who do not have English as their first language.

**Question 31: 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, further research is required to identify gaps in non-price protection for different energy users in Northern Ireland. Some key focus areas for this research could include:

- **Vulnerable Consumer identification:** Conduct studies to identify specific groups of vulnerable consumers, such as low-income households, elderly residents, and those with disabilities, to understand their unique energy needs and challenges.
- **Awareness and accessibility:** Assess the current awareness of existing non-price protections among different user groups and evaluate how accessible these protections are. This may include evaluating the effectiveness of communication strategies used by energy providers and regulatory bodies.
- **Impact of energy transition:** Analyse how the transition to renewable energy and changes in the energy market impact non-price protections for various user sectors and identify potential gaps in support.
- **Comparative Analysis:** Look at non-price protections in other jurisdictions to identify best practices and lessons learned that could be applied in Northern Ireland.
- **Regulatory Framework:** Review the existing regulatory framework to pinpoint any shortcomings or inconsistencies in protections for different types of energy users.
- **Method of Billing and Payment Options:** Explore the different billing methods and payment options available, assessing their fairness and accessibility for all user groups, especially those who may struggle with traditional payment systems.
- **Consumer Rights and Dispute Resolution:** Investigate the effectiveness of consumer rights protections and dispute resolution mechanisms in place, focusing on their adequacy for protecting non-price aspects of energy services.
- **Environmental and Social Impact Considerations:** Assess the intersection of environmental policies with non-price protections, ensuring that energy strategies are equitable and do not disproportionately impact vulnerable communities.
- **Engagement with Stakeholders:** Gather input from a wide range of stakeholders, including consumer advocacy groups, energy providers, and governmental agencies, to understand their perspectives on current protections and needed improvements.

By focusing on these areas, research can help to ensure that non-price protections are comprehensive, effective, and adaptable to the evolving energy landscape in Northern Ireland.

**Question 32: What is your view on whether government should adopt a common quality assurance standard or framework across all energy efficiency and low carbon heat grant schemes?**

The adoption of a common quality assurance standard or framework across all energy efficiency and low carbon heat grant schemes by the government could offer several significant benefits:

- **Consistency and Transparency:** A unified framework would ensure that all schemes adhere to the same standards, promoting consistency in the fuel poverty strategy implementation. This would provide clarity for both consumers and service providers, fostering trust in the strategy.
- **Improved Quality of Services:** A common standard could help ensure that all contractors and service providers meet minimum quality requirements, reducing the risk of poorly executed installations and ensuring that the benefits of energy efficiency measures are fully realised.
- **Streamlined Processes:** Having a standard framework may simplify administrative processes, reducing confusion and making it easier for applicants to navigate the various programmes. This could also ease the burden on government agencies managing these schemes.
- **Enhanced Reporting and Accountability:** A common framework would facilitate better tracking and reporting of outcomes across different programmes, allowing for more effective evaluation of their success and identification of areas for improvement.
- **Encouragement of Best Practices:** A standardised approach could promote the sharing of best practices across different areas and schemes, leading to continuous improvement in energy efficiency measures and low carbon technologies.
- **Increased Participation:** With clear standards in place, more homeowners may be encouraged to participate in energy efficiency programmes, knowing that they will receive support that meets a recognized quality standard.

However, there are also considerations to keep in mind:

- **Implementation Costs:** Establishing and enforcing a common standard may require significant initial investment in terms of resources and training. This needs to be weighed against the long-term benefits.
- **Potential for Bureaucracy:** A standardised approach could lead to increased bureaucracy, which might slow down the rollout of grants and limit accessibility for potential beneficiaries.
- **The potential for fraud and/or misinformation provided by applicant**

Overall, while the development of a common quality assurance standard or framework presents certain challenges, the potential benefits in terms of consistency, quality, and effectiveness make it a worthwhile consideration for improving energy efficiency and low carbon heat grant schemes. Careful planning and stakeholder engagement would be crucial to ensure that the implementation is practical and beneficial across different contexts.

**Question 33: Do you agree that government should take a common approach to consumer protection across all supported energy efficiency schemes?**

Causeway Coast and Glens Borough Council agree that government should take a common approach to consumer protection across all supported energy efficiency schemes. Consumer protection measures and consumer confidence in those measures are essential components of well-functioning energy efficiency schemes.

**Question 34: Do you have suggestions about how government could change our use of language to improve buy-in and engagement on fuel poverty?**

Yes, a more positive or constructive term for "fuel poverty" could be "energy affordability challenges." This phrasing focuses on the issue as one of affordability rather than deprivation, emphasising the need for solutions and support rather than solely highlighting the negative aspects of the situation. Other alternatives might include "energy accessibility needs" or "energy security challenges," which also frame the issue in a way that suggests potential for improvement and support. A consideration for a simplified title could be "Warm and Healthy Homes"

**Question 35: Do you agree that government should take a basket of indicators approach to measuring and understanding fuel poverty?**

Yes, Causeway Coast and Glens Borough Council agree, a basket of indicators approach can be very effective for measuring and understanding fuel poverty. Fuel poverty is a multifaceted issue that encompasses not only income levels but also housing quality, energy prices, and household energy usage patterns. Utilising a range of indicators, such as winter deaths, household energy expenditure relative to total expenditure, and other socio-economic factors, can provide a more comprehensive understanding of the complexities surrounding fuel poverty. For example:

- Winter Deaths: Tracking winter mortality rates can highlight the health impacts of inadequate heating and poor living conditions, illustrating the human cost associated with fuel poverty.
- Energy Expenditure: Comparing energy costs to overall household expenditure can help identify how much of a household's budget is being consumed by energy needs, revealing financial strain and potential risk of fuel poverty.
- Housing Quality: Including indicators related to insulation, heating systems, and overall energy efficiency can shed light on the structural factors that contribute to fuel poverty.
- Income Levels: Understanding income levels, including disparities based on demographics or geographic locations, can help identify which populations are most at risk.
- Energy Prices: Monitoring fluctuations in energy prices can provide insights into how external economic factors impact households' ability to afford energy.

By using a diverse set of indicators, with particular focus on the poverty index, government can better tailor policies and interventions to address the root causes of fuel poverty and implement more effective solutions.

**Question 36: Are the indicators suggested the correct ones?**

Yes, however there is the potential for data overload. Careful consideration of the most meaningful indicators is necessary.

An additional indicator on the quality of housing stock may also be useful.

**Question 37: If you agree with the introduction of an indicator based on energy confidence or awareness, do you have suggestions about what kind of indicator might be most valuable?**

To gauge consumer energy awareness and confidence, several indicators can be valuable such as

- Surveys and Polls: Conducting surveys that assess consumer knowledge about energy sources, conservation methods, and renewable energy can provide direct insights into



awareness levels. Questions about their understanding of energy costs, efficiency, and environmental impacts can be particularly revealing.

- **Energy Consumption Patterns\*\*:** Analysing trends in energy usage can indicate consumer confidence. A significant shift towards energy-efficient appliances, smart home technology, or renewable energy adoption may suggest increased awareness and confidence in sustainable energy choices.
- **Participation in Energy Schemes:** Tracking participation in energy efficiency programmes, renewable energy adoption (like solar panel installation), and demand response initiatives can indicate both awareness and confidence levels among consumers.
- **Feedback Mechanisms from Utility Companies:** Utility customer feedback about rates, service quality, and energy saving programs can serve as an indicator of consumer confidence. High satisfaction rates may correlate with awareness and confidence in energy management initiatives.

Combining these qualitative and quantitative measures will provide a fuller picture of consumer energy awareness and confidence, helping to inform policies and programs designed to enhance energy literacy and promote sustainable practices.

**Question 38: Do you agree with our proposal that carbon emissions are not used as a fuel poverty indicator? Please provide reasons for your answer.**

The question of whether carbon emissions should be used as a fuel poverty indicator is complex and involves various considerations.

There are compelling arguments for not using Carbon Emissions as a Fuel Poverty Indicator such as:

- **Primary Focus on Affordability:** Fuel poverty is primarily about the inability of households to afford adequate heating and energy. Using carbon emissions as a metric may shift the focus away from the immediate financial stress experienced by low-income households.
- **Diverse Energy Sources:** Different communities rely on a variety of energy sources with different carbon profiles. Some low-income households may use cheaper, less environmentally friendly energy sources (e.g., coal or older gas systems) to stay warm, which may not reflect their overall carbon footprint.
- **Impact on Policy:** Relying on carbon emissions as a fuel poverty indicator could lead to policies that focus more on emissions reductions than on helping people access affordable energy. The needs of vulnerable populations could be neglected.
- **Complexity of Measurement:** Accurately measuring carbon emissions requires comprehensive data on energy usage, which can be difficult to obtain. This adds complexity to an already critical issue.

However, ignoring carbon emissions in the context of fuel poverty could counteract long-term sustainability goals. Fuel poverty initiatives should ideally align with climate goals to ensure energy systems are both affordable and environmentally responsible. Households in fuel poverty often live in energy-inefficient homes, which can result in high carbon emissions. Improving energy efficiency could reduce both fuel poverty and carbon output, making it relevant to consider both issues together.

In addition, using carbon emissions as a factor could raise awareness about the environmental impacts of energy consumption, potentially encouraging more sustainable practices among low-income households in the long run.

Ultimately, while there are valid reasons for DfC's proposal not to use carbon emissions as a fuel poverty indicator, it is also essential to recognise the interconnectedness of these issues. A balanced approach that considers both immediate needs for affordable energy and long-term sustainability goals may be the most effective strategy for addressing the dual challenges of fuel poverty and climate change.

**Question 39: What is the best way to continue to engage with people experiencing fuel poverty?**

Engaging with people experiencing fuel poverty requires an empathetic approach that considers their specific needs and challenges. This may be facilitated through Community Planning structures.

Establish connections through regular communication, showing genuine care and understanding. Use trusted local representatives such as local council officers or trusted community members to facilitate relationships.

Share clear, concise information about available assistance programmes, energy-saving tips, and financial support options. Use multiple formats (e.g., hard copy leaflets, social media, workshops) to reach different audiences.

Organise local community gatherings, workshops, or forums to raise awareness about fuel poverty and discuss solutions. This can also help build a supportive community network.

Encourage feedback through surveys, focus groups, or informal check-ins to understand their experiences, needs, and preferences better.

Collaborate with local organisations: Work with local councils, charities, social services, and energy companies to develop comprehensive support programmes tailored to the community's specific needs.

Offer practical support, providing resources such as energy efficiency assessments, assistance with applying for grants or subsidies, and connecting them with home improvement schemes.

By combining these strategies, stakeholders can effectively engage with individuals experiencing fuel poverty, providing the support they need while also empowering them to take charge of their energy needs.

**Question 40: Do you agree with the proposal for a Fuel Advisory Group. If not, can you suggest an alternative?**

Yes. The formation of a fully representative fuel advisory group is critical to ensure that all stakeholders are fully engaged and aligned towards achieving the vision of warm, healthy homes for everyone.

**Question 41: If you have any further comments or suggestions not already captured, please provide these.**

No further comments.