



**Warm Healthy
Homes**



Department for
Communities

www.communities-ni.gov.uk

Warm Healthy Homes Fund

Consultation on an energy efficiency scheme to improve warmth, health and energy affordability of low-income households in the owner-occupier and private rented sectors.

Email Response Form

Warm Healthy Homes Fund Consultation

Enquiries to:

Home Energy Branch

Department for Communities

Causeway Exchange

1-7 Bedford Street

Belfast

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BT2 7EG

Email: HEB@communities-ni.gov.uk

Web: www.communities-ni.gov.uk/consultations/consultation-warm-healthy-homes-fund

How to Respond

This consultation will be hosted online at the following website: [NI Direct - Citizen Space](#). The Citizen Space website has been specially designed to be as user-friendly and welcoming as possible for those who wish to complete the consultation. It also allows DfC to rapidly collate results. For this reason, we would encourage anyone who is interested in responding to this consultation to utilise Citizen Space as the method of their response.

Your response will be most useful if it is framed in direct response to the questions asked, though further comments and evidence are also welcome.

If this is not possible, you can however respond to this consultation via email to HEB@communities-ni.gov.uk by completing this form on the departments website or you can respond in writing to the following address:

Warm Healthy Homes Fund Consultation

Department for Communities

Climate Change Division

4th Floor, Causeway Exchange

1-7 Bedford Street

Belfast

Antrim
BT2 7EG

When responding via email or in writing, please state whether you are responding as an individual, or representing the views of an organisation (please state the name of the organisation). Please also quote the following reference in your response: “Warm Healthy Homes Fund Consultation”. In addition, when replying via email, it is possible to add supporting information to your response, either by way of an attachment or by posting text in the body of the email. Please ensure that you reference the question the additional information is in response to when doing so.

Responses must be received by **23:59 on 19 August 2026**.

Please contact us if you require this document in an alternative format for accessibility purposes.

General Information

Name: **Sustainable Northern Ireland (Sustainable NI)**

Email Address: **info@sustainableni.org**

What best describes your interest in this consultation

1. Member of the public
2. Academia
3. Energy Efficiency/Heating supplier
4. Energy Efficiency/Heating installer
5. Government representative
6. Arms Length Body
7. Fuel Poverty representative organisation
8. Other (please specify) ☒ environmental NGO

Please indicate if you are replying as:

1. An individual / Member of the Public

2. On behalf of a body or organisation (please specify who you represent below)
☒ – Sustainable Northern Ireland (SNI)

Proposal: Eligibility

Question 1

Given the limitations of funding, the Department proposes that households in receipt of the Personal Allowance of Universal Credit (for three consecutive periods) and those in receipt of Pension Credit are eligible for assistance. In addition, income under a set threshold will also be used as an eligibility criterion. It proposes that the total household income threshold of the new Warm Healthy Homes Fund should be set at the rate of the National Living Wage, which is currently £29,741.40, net of tax and national insurance, and that it should rise annually in line with the National Living Wage.

Under this proposal, the Department proposes to exclude certain disability and health related benefits and allowances from the income threshold, including the winter fuel payment, recognising that these households may have higher energy needs.

Do you agree with the proposed approach when assessing eligibility for the Warm Healthy Homes Fund?

- ☒ Yes
☐ No

Please give reasons for your answer limited to 500 words.

Sustainable NI welcomes the proposed approach to eligibility. Targeting assistance at households in receipt of the Universal Credit Personal Allowance and Pension Credit, alongside an income threshold, is consistent with the Warm Healthy Homes 2026–2036 Fuel Poverty Strategy principle of helping the worst first, and directs finite resources toward those least able to afford a warm, healthy home. Sustainable NI particularly welcomes the decision to set the income threshold at the level of the National Living Wage and to adjust it annually. A static threshold quickly falls behind the cost of living and excludes households that narrowly exceed an outdated limit – a

key weakness of the previous Affordable Warmth Scheme, which relied on a £23,000 gross income figure that no longer reflected rising living costs.

Sustainable NI also welcomes the exclusion of certain disability and health-related benefits, including the Winter Fuel Payment, from the income assessment. These payments are intended to meet additional costs and should not be treated as disposable income.

Sustainable NI offers the following observations to strengthen the approach:

1. Fuel poverty is driven by more than gross income. Household composition, health, and the energy efficiency of the dwelling all shape affordability. Sustainable NI would encourage the Department to assess disposable income (after housing costs) where practicable, and to complement the income test with a vulnerability matrix, such as that used under the Northern Ireland Sustainable Energy Programme (NISEP), so that support reaches those in greatest need.
2. Many fuel-poor households are not in receipt of means-tested benefits, either because they narrowly exceed thresholds or have not claimed. The income-threshold route is therefore essential to reaching these households, and should be retained and actively promoted, for example through the health service and local councils as front-line service providers.
3. Sustainable NI would welcome clarity on how the three-consecutive-period qualifying condition for the Universal Credit Personal Allowance will operate in practice, to ensure it does not inadvertently exclude households whose circumstances fluctuate.
4. Sustainable NI recommends that those carrying out home assessments receive fuel poverty training, to support consistent, person-centred decisions.
5. Sustainable NI further recommends that data-sharing arrangements between departments are resolved so that eligible households can be identified proactively, rather than relying solely on self-referral.

Proposal: Savings

The Department proposes that household savings should be taken into account in a proportionate way, recognising the need for some savings while ensuring support is targeted at those most in need.

Under this proposal, households may hold up to £6,000 in combined personal savings without this affecting eligibility. Savings above this level would be treated as income using an established approach already applied in other government schemes. The rate at which savings are counted would differ depending on the age of the applicant, with a more generous treatment for those aged 60 and over.

The Department is seeking views on whether this approach to savings is appropriate.

Question 2

Do you agree with the proposed approach to how household savings are treated when assessing eligibility for the Warm Healthy Homes Fund?

- ☒ Yes
- ☐ No

Please give reasons for your answer limited to 500 words.

Sustainable NI supports a proportionate approach to the treatment of savings, which is consistent with the needs-based principle underpinning the Warm Healthy Homes 2026–2036 Strategy. A modest savings disregard of £6,000 recognises that low-income households – particularly older people and those on fixed incomes – may hold limited savings as a buffer against emergencies, while still targeting support at those most in need. Treating savings above that level as income, using an established approach already applied in other government schemes, offers consistency and simplicity and aligns the Fund with wider practice. Sustainable NI welcomes the more generous treatment for applicants aged 60 and over, which rightly reflects that older households are less able to rebuild savings and are at greater risk of the health harms associated with cold homes. Sustainable NI would ask the Department to keep the savings threshold under review and to adjust it over time, in the same way as the income threshold, so that it retains its value against inflation. Clear, accessible guidance on how savings will be assessed will be important to avoid deterring eligible households from applying.

Proposal: Prioritisation of applications

Given the large number of households likely to be eligible for the Warm Healthy Homes Fund and the limited budget available, the Department proposes prioritising applications after eligibility has been confirmed.

To ensure funding is targeted at those most in need, the Department proposes prioritising properties with the lowest energy efficiency. Applications would therefore be prioritised based on the Energy Performance Certificate (EPC) rating of the property, with priority given to homes rated EPC E or below, as these households are more likely to experience severe fuel poverty.

All eligible properties would require a home assessment to confirm the EPC rating. Home assessments would be carried out on a first-come, first-served basis; however, due to budget constraints, not all eligible properties may ultimately receive support.

The Department is seeking views on whether this is an appropriate approach to prioritisation.

Question 3

Do you agree that the Department should prioritise Warm Healthy Homes Fund applications based on the energy rating of the property?

- ☒ Yes
- ☐ No

Please give reasons for your answer limited to 500 words.

Sustainable NI agrees that the energy efficiency of the property should be a central factor in prioritisation, and supports prioritising the least efficient homes, as these households are most likely to experience severe fuel poverty. This is consistent with a fabric-first, worst-first approach, directing investment where it delivers the greatest reduction in energy demand, bills and carbon emissions. Sustainable NI cautions, however, that the EPC rating should not be the sole determinant of priority. The EPC metric has recognised limitations: ratings must be current to be reliable, and the methodology relies on modelled fuel-cost assumptions that can quickly become

outdated amid energy price volatility. This can produce perverse outcomes; for example, an efficient low-carbon heating system may lower an EPC rating because electricity unit costs are higher than gas. Experience from the ECO scheme in Great Britain showed fuel-poor households being unable to access measures because their rating was deemed adequate, or upgrades economically unviable. Sustainable NI therefore recommends a holistic approach that considers EPC rating alongside household vulnerability and need, for example through a vulnerability matrix capturing age, disability, health conditions and household composition, so that a household in acute need is not deprioritised by a modelled rating alone. Sustainable NI also urges that prioritisation be rural-proofed. Rural households in Northern Ireland are at heightened risk of fuel poverty, driven by very high reliance on home heating oil and higher installation and access costs, and are more likely to remain in cold, under-treated homes without targeted support. Finally, Sustainable NI would welcome assurance that the first-come, first-served basis for home assessments does not disadvantage households who are digitally excluded or less able to navigate the application process. Proactive outreach and supported referral pathways will be essential to ensuring equal access.

If you answered no, do you think that the Department should prioritise applications based on another reason?

Please provide detail limited to 500 words.

N/A

Proposal: Private Rented Sector

Question 4

The Department proposes that Private Rented Sector landlords may access fully funded cavity and loft insulation, draught proofing, and ventilation, provided their tenant meets Warm Healthy Homes Fund eligibility criteria.

Do you agree with this proposal?

- ☒ Yes
- ☐ No

Should additional measures be included such as replacement windows, solar photovoltaic (PV) systems and electrical energy (battery) storage?

Do you agree with this addition?

- ☒ Yes
- ☐ No

If you answered No to either of these questions, please give reasons for your answer limited to 500 words.

Sustainable NI supports the proposal to make fully funded insulation, draught proofing and ventilation available to Private Rented Sector landlords where the tenant meets the eligibility criteria. The PRS has consistently had the highest levels of fuel poverty and some of the least energy-efficient stock, yet has too often been the poor relation in previous funding programmes. Enabling fabric-first improvements in these homes is essential to delivering warmth, health and affordability for low-income tenants, and reflects the Strategy's commitment to raising standards across all tenures.

Sustainable NI also agrees that additional measures such as replacement windows, solar photovoltaic (PV) systems and battery storage should be included. A whole-house, fabric-first approach delivers the greatest and most durable benefit, and on-site renewable generation and storage can meaningfully offset the running costs of

low-carbon heating which is an important consideration for affordability where electricity unit costs are comparatively high. This is consistent with a just transition that ensures low-income and vulnerable households share in the benefits of decarbonisation rather than being left behind.

Sustainable NI makes three recommendations to safeguard tenants and public value:

1. Tenant protections must accompany landlord support: safeguards against unjustified rent increases or eviction following publicly funded upgrades are essential, so that the benefit accrues to the tenant whom the Fund is designed to help. A defined post-works protected period should be considered.
2. Publicly funded improvements to a private asset should, over time, be linked to Minimum Energy Efficiency Standards in the PRS, so that grant support and regulation work together rather than public money substituting for landlord responsibility.
3. Implementing learning from Scotland's PRS landlord support and from Rent Smart Wales on enforcement would help maximise uptake, which has historically been low under the Affordable Warmth Scheme. These schemes showed that grant support and regulation have to work in tandem. Carrots (Scotland's scheme) drive limited uptake without sticks, and sticks (Wales' scheme) only work if you have the landlord registration data to enforce them.

Proposal: Grant Limits

The Department proposes setting a grant limit of £35,000 for the Warm Healthy Homes Fund that will allow for a fabric first, whole house approach including Air Source Heat Pump, solar photovoltaic (PV) systems and electrical energy (battery) storage.

This will be increased to £45,000 to support those ‘hard-to-treat’ properties i.e. those of Non-Traditional Construction, Solid Wall Construction or have Environmental Constraints.

Up to £500 will be included within the grant limit for properties that require some general maintenance or remedial works before energy efficiency measures can be installed. It is anticipated that not all properties will require the full grant limit.

Question 5

Do you agree with this proposal?

- ☒ Yes
☐ No

If you answered No, please give reasons for your answer limited to 500 words.

Sustainable NI supports the proposed grant limits. A limit of £35,000, enabling a fabric-first, whole-house approach, is a welcome step change from previous schemes, whose grants were often insufficient to treat homes properly. Sustainable NI particularly welcomes the higher £45,000 limit for hard-to-treat properties of non-traditional or solid-wall construction, or those with environmental constraints. These homes, which include a significant proportion of Northern Ireland’s older and rural stock, have historically been under-served precisely because previous grant ceilings were too low to meet their needs; their recognition here is important for preventing postcode lotteries and delivering a just transition. The provision of up to £500 for general maintenance or remedial works, to enable measures to be installed safely, is a sensible inclusion that should reduce the number of homes deemed unsuitable at assessment. Sustainable NI would ask the Department to keep both the grant limits

and the remedial allowance under review, and to adjust them over time in line with construction and materials costs, so that their real value is maintained across the life of the Fund. Sustainable NI would also encourage flexibility so that exceptional cases, such as the most severe hard-to-treat properties, are not left partially treated where a modest additional investment would complete the works.

Proposal: Application Limit

Question 6

The Department proposes that an applicant may apply only once to the Warm Healthy Homes Fund and that the Home Assessment will determine what support that property would benefit from.

Do you agree with this proposal?

- ☒ Yes
☐ No

If you answered No, please give reasons for your answer limited to 500 words.

Sustainable NI recognises the value of a whole-house approach and agrees it delivers better value for public funds. Sustainable NI would, however, ask the Department to build in a degree of flexibility so that a strict once-only rule does not disadvantage households in exceptional circumstances. In practice, funding constraints may mean a whole-house solution is delivered in phased steps. Works may need to pause, for example, where a property requires remedial works beyond the £500 allowance (such as addressing damp or a structural defect that must be resolved before insulation or a heat pump can be installed safely), or where the household experiences a change in circumstances such as a bereavement or hospital admission. Where a household has received only partial treatment, it should not be permanently excluded from returning for the remaining measures. Provision should similarly be made where a household's circumstances change materially, where an earlier measure fails or requires remediation, or where new technologies become available that were not part of the original assessment. Clear guidance on how such exceptional cases will be handled would provide reassurance to applicants and reflect the Strategy's commitment to responding to changing needs.

Proposal: Quality Standards

To ensure that energy efficiency measures delivered through the Warm Healthy Homes Fund are installed safely, consistently and to a high standard, the Department proposes that registered contractors working on the scheme should be assigned to householders and that they must hold appropriate, measure-specific accreditations.

Question 7

The Department proposes that a list of registered contractors would be provided to households to deliver the works identified by the Home Assessment, ensuring ease of access and a streamlined service for applicants.

Do you agree with this proposal?

- ☒ Yes
☐ No

If you answered No, please give reasons for your answer limited to 500 words.

Sustainable NI supports providing households with a list of registered, accredited contractors to deliver the works identified by the home assessment. Robust consumer protection is fundamental to building the householder trust and confidence needed for uptake; learning from UK retrofit programmes has shown that householders are often sceptical of works offered at no cost, and a managed list of vetted contractors, combined with measure-specific accreditation, provides assurance on quality, technical competence and consumer protection while offering households a streamlined, accessible service. To ensure the approach works well for vulnerable households, Sustainable NI recommends:

1. A clear, simple and independent redress mechanism sits behind the contractor list, so households know where to turn if problems arise
2. Adequate geographic coverage is secured, including in rural areas, to avoid delays or gaps in provision that could amount to a postcode lottery
3. The Managing Agent provides supported choice for households who may find it difficult to select or liaise with a contractor unaided

4. Funding to support skills development will be essential to ensure a sufficient pool of accredited installers for low-carbon technologies.

To work on the Warm Healthy Homes Fund, a contractor must be VAT-registered, be registered with the Managing Agent to work on the Warm Healthy Homes Fund, and be accredited to a relevant trade body, including:

- Gas Safe (must be gas safe registered to install gas appliances)
- NICEIC (Electrical work)
- British Board of Agrément (BBA) (Loft, cavity wall, solid wall)
- Solid Wall Insulation Guarantee Agency (SWIGA) (Solid wall)
- National Insulation Association (NIA) (Loft, cavity wall)
- Cavity Insulation Guarantee Agency (CIGA) (cavity wall).
- Microgeneration Certification Scheme (MCS) (small-scale renewable energy systems)
- Installation Assurance Authority – (single compliance platform)

The proposed approach reflects current practice across government-funded energy efficiency schemes and is intended to provide assurance on quality, consumer protection and technical competence. As the Fund develops, it is proposed that contractor standards would align with those used in other government schemes, which may include a transition to PAS 2030 and PAS 2035 standards, or similar.

Question 8

Do you think that industry is ready to adopt or move to the principles of PAS 2030/2035?

- ☐ Yes
☒ No

If you answered No, please give reasons for your answer limited to 500 words.

Sustainable NI supports the ambition of aligning the Fund with recognised quality standards such as PAS 2030 and PAS 2035, which is the right long-term direction of

travel. Sustainable NI is not convinced, however, that industry in Northern Ireland is currently ready to move fully to PAS 2030/2035 without a planned, supported transition, and has answered 'No' to reflect a realistic assessment of current capacity rather than any disagreement with the principle. Adopting PAS 2035 requires specific roles, such as Retrofit Coordinators, Assessors and Designers, and a depth of accredited capacity that is still developing locally. Evidence from the roll-out of these standards in Great Britain shows that moving too quickly, without sufficient trained personnel, risks bottlenecks, delays and increased costs, which would slow delivery to the very households the Fund is intended to help.

Sustainable NI therefore recommends a phased transition, supported by investment in training, skills and workforce development, with a clear timeline and interim accreditation requirements. A common quality assurance framework across all government energy efficiency and low-carbon heat schemes would provide consistency and help the sector build capacity efficiently. With the right support and lead-in time, Sustainable NI believes industry can move to these principles; the priority is to sequence the transition so that it raises standards without disrupting delivery to fuel-poor households.

Question 9

Are there any other alternative standards or accreditations that may be applied to contractors working on all government energy efficiency schemes?

☒ Yes

☐ No

Please provide detail limited to 500 words.

Sustainable NI considers the proposed accreditations to be broadly appropriate and comprehensive. The consultation describes the Microgeneration Certification Scheme (MCS) as covering small-scale renewable energy systems; Sustainable NI would note that MCS in fact certifies both small-scale renewable generation and low-carbon heat technologies, including air source heat pumps, and this should be made explicit given that the Fund supports heat pump installation. TrustMark, as the government-endorsed quality mark underpinning PAS 2030/2035 delivery in Great Britain, is also

worth aligning with as the Fund matures. More broadly, Sustainable NI recommends that Government adopt a common quality assurance standard and a common approach to consumer protection across all supported energy efficiency and low-carbon heat schemes, so that households experience consistent standards and redress regardless of which scheme delivers their measures. Whatever accreditations are required, the essential elements are verified installer competence, appropriate guarantees, and a simple, accessible and independent route to redress.

Proposal: Aftercare

It is proposed that initial aftercare advice will be available to all applicants. This will be a routine follow up between 6 and 12 weeks after installation to ensure that equipment is being used correctly and effectively. It is anticipated that the Managing Agent will instigate the aftercare by telephone to establish if a follow up visit is required. Should a visit be needed then the contractor who completed the works should visit the property to address any concerns or issues.

Question 10

Do you think that the proposed aftercare arrangements are sufficient?

- ☐ Yes
☒ No

If you answered no, please provide additional detail (limit of 500 words) on any additional aftercare that the Managing Agent of the Warm Healthy Homes Fund should provide.

Sustainable NI welcomes the commitment to aftercare and considers a follow-up between 6 and 12 weeks after installation to be a sensible starting point. Sustainable NI does not, however, consider the proposed arrangements, as described, to be sufficient on their own, and recommends the following enhancements:

1. Aftercare should place strong emphasis on education and advice at the point of, and following, installation – helping households understand how to operate new systems (particularly heat pumps and renewable technologies, which behave very differently from traditional heating) so that they realise the expected savings and comfort. Evidence consistently shows that the benefits of low-carbon heating and renewables depend heavily on households understanding how to use them. To this end, we would argue that all participating households receive one mandatory visit following installation to ensure the householder understands how to operate the new systems.
2. A single telephone contact may not suit everyone; provision should be made for those who are digitally excluded, have communication or accessibility

needs, or would benefit from an in-person visit as the default rather than the exception.

3. A longer-term check, for example a further follow-up after the first heating season, since issues with comfort, running costs or performance may only become apparent over a full winter.
4. Aftercare should include clear signposting to wider energy advice, income-maximisation and tariff support, and to independent redress where a household is dissatisfied with the works.

Equality Considerations

Question 11

Please comment on any potential equality implications you feel may arise from the issues/proposals discussed in this consultation.

Sustainable NI welcomes the Department's attention to equality and encourages a thorough equality impact assessment under Section 75 of the Northern Ireland Act 1998. Fuel poverty is closely bound up with equality: it disproportionately affects older people, people with disabilities and long-term health conditions, families with young children, those on low incomes, and people living in rural areas. It is also a matter of climate justice, since Northern Ireland has among the highest rates of fuel poverty in the UK. Designed well, the Fund can advance equality of opportunity across several Section 75 categories; designed poorly, it risks entrenching disadvantage.

Sustainable NI highlights the following considerations:

- **Age and disability:** the disregard of disability and health-related benefits and the more generous savings treatment for older applicants are positive and should be retained, recognising higher energy needs.
- **Rural equality:** rural households in Northern Ireland are at heightened risk of fuel poverty, driven principally by very high reliance on home heating oil – an unregulated fuel with no price-cap protection – compounded by typically higher installation and access costs. Oil remains the primary heating method for the majority of households in Northern Ireland (NISRA Continuous Household Survey Heat and Insulation Results, 2024/25), with reliance considerably higher in rural areas where the gas network does not reach. Sustainable NI welcomes the enhanced grant limit for hard-to-treat homes and urges that the scheme be rural-proofed so that location does not determine access.
- **Accessibility of the process:** reliance on a first-come, first-served, and potentially digital, application route could disadvantage those who are digitally excluded, have literacy or language needs, or find bureaucratic processes a barrier. Proactive outreach, trusted referral pathways and support with applications will be important.

- **Tenure:** PRS tenants have historically been under-served and have limited agency over their homes' efficiency. Their inclusion is welcome and must be matched by protections against rent increases or eviction following publicly funded works, alongside a paired regulatory mechanism that encourages landlords to participate.
- **Monitoring:** Sustainable NI recommends that equality monitoring data be collected across the life of the Fund so that any disparities in access or outcomes between groups can be identified and addressed, and that people with lived experience of fuel poverty are engaged in the ongoing design and review of the scheme. This would support delivery that is fair, inclusive and consistent with a just transition.

Privacy Notice

Data Controller Name: Department for Communities

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