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Ministerial Foreword

The Warm Homes Scheme has been my Department’s primary tool in tackling fuel poverty since its inception in 2001. The scheme has been very popular and very successful and has improved the energy efficiency of more than 120,000 low income households. I thank and pay tribute to all those organisations who have delivered the Warm Homes Scheme since 2001.

The Department’s Fuel Poverty Strategy “Warmer Healthier Homes” called for increased partnership working and improved targeting of resources to assist those households most at risk of fuel poverty. The Department has been working with colleagues in the University of Ulster, the local Councils and the Housing Executive on the development of a new evidence based model for tackling fuel poverty. The early pilots have been impressive in terms of targeting those households most in need of assistance and I am encouraged by the progress.

This consultation document outlines the findings from the Affordable Warmth pilots and proposes changes to the delivery of energy efficiency improvements to low income households. The proposals are evidence based and I believe they will provide a sound basis for making low income homes throughout Northern Ireland warmer and healthier.

I am happy to launch these proposals for a new Affordable Warmth Scheme for Northern Ireland. I hope they will encourage debate among a wide range of interested bodies. I invite you to take this opportunity to give your views on the proposals.

Thank you.

Nelson McCausland MLA
Minister for Social Development
The Department for Social Development’s Fuel Poverty Strategy “Warmer Healthier Homes” committed the Department to improving partnership working and increasing innovation to tackle fuel poverty in Northern Ireland.

This public consultation document “From Fuel Poverty to Achieving Affordable Warmth” proposes a new approach to assisting those households most affected by fuel poverty in Northern Ireland. The Department proposes to introduce a new model for the delivery of energy efficiency of low income households which builds on the success of Affordable Warmth pilots which the Department ran with Councils and the Housing Executive in 2012 and 2013. The new model will involve the Department working in partnership with the:

- University of Ulster to produce maps and information at council level on areas where fuel poverty is most prevalent;
- Council staff to carry out initial visits to targeted households identified by the University to assess eligibility for assistance;
- Housing Executive to assist the householders and to arrange delivery of energy efficiency improvement measures by local installers.

The Department proposes to introduce a new Affordable Warmth Scheme which will make some key changes to the:

- the qualification criteria; and
- the energy efficiency measures available.

This document set out proposals for:

- improved targeting;
- improvements in future partnership working;
- assisting the private rented sector;
- changes to the eligibility qualification criteria;
- changes to the energy efficiency measures available;
- management of self referrals to the scheme; and
- client contribution.
1. Introduction

Purpose

1.1 This public consultation document seeks comments on proposed changes to the Department for Social Development’s Domestic Energy Efficiency Improvement Programme for vulnerable households which is presently delivered through the Warm Homes Scheme. This consultation will end on 9 May 2014 after a 12 week public consultation and all responses will be considered accordingly.

Historic Context

1.2 The Warm Homes Scheme was first established in 2001 and it is funded by the Department for Social Development, its purpose is to improve domestic energy efficiency and therefore, reduce energy consumption in eligible private housing. The scheme has been the Department’s primary tool for tackling fuel poverty in Northern Ireland. Since its launch in 2001 the scheme has had an annual target of installing energy efficiency improvements in at least 9,000 homes and has been meeting the target consistently. The Warm Homes Scheme provides a range of measures, helping to make homes warmer, healthier and more energy efficient. Since its inception in 2001 the scheme has helped to improve the energy efficiency of almost 120,000 homes and has invested over £150 million in energy efficiency measures. The scheme has achieved an average energy efficiency gain of 15% in the households assisted by the scheme as recorded by Reduced Data Standard Assessment Procedure\(^1\).

Strategic Links

1.3 The Department’s Fuel Poverty Strategy “Warmer Healthier Homes”\(^2\) published in March 2011 gave a commitment to improve partnership working and to explore an area based approach to tackling fuel poverty. Northern Ireland’s first independent review of Fuel Poverty “Defining Fuel Poverty in Northern Ireland”\(^3\) (Liddell, Morris, McKenzie and Rae) was published in May 2011 and, among other things, reported that more than 33,000 homes in Northern Ireland needed to spend more than a quarter of their income on heating and lighting their homes. This independent review was able to demonstrate that, of those in fuel poverty, a total of 33,000 households in Northern Ireland were in either severe (15-20% needs to spend) or extreme (>20% needs to spend) fuel poverty. This represents more than 11% of all households that are in fuel poverty.

This research has influenced the future strategic direction of the Department’s fuel poverty policy and has provided the basis for the proposals in this consultation document.

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1 The Standard Assessment Procedure (SAP) is the Government’s standard method of rating the energy efficiency of a dwelling. The SAP rating is on a logarithmic scale and provides a comparative measure of the energy efficiency of dwellings. The lower the score the lower the energy efficiency and the higher the score (up to a maximum of 100) the higher the efficiency.

2 http://www.dsdni.gov.uk/warmer-healthier-homes.pdf

Responses

1.4 Comments on any aspect of the proposed changes discussed in this paper would be welcome. They should reach the Department by 9 May 2014. You may provide comments by letter, email, telephone or fax. Please reply to:

Oliver McHugh
Department for Social Development
Housing Division
Level 2, Lighthouse Building
2/4 Cromac Avenue
Gasworks Business Park
Ormeau Road
Belfast
BT7 2JA

Tel: (028) 90829307
Fax :( 028) 90829343
Email: affordable.warmth@dsdni.gov.uk

1.5 If this document is not in a format that suits your needs, please contact us and we can discuss alternative arrangements that may better suit your specific requirements.

Additional Copies

1.6 Copies of this document are at “Consultations” on the Department’s website, www.dsdni.gov.uk
2. What is fuel poverty?

2.1 Under the current Northern Ireland Fuel Poverty Strategy, a fuel poor household is one which needs to spend more than 10% of its income on all fuel use and to heat its home to an adequate standard of warmth. This is generally defined as 21°C in the living room and 18°C in the other occupied rooms – the temperatures recommended by the World Health Organisation (WHO).

2.2 The Warm Homes Scheme has been the Department for Social Development’s main tool for tackling fuel poverty since its inception in 2001 and since then the scheme has helped to improve the energy efficiency of almost 120,000 homes and has invested over £150 million in energy efficiency measures. The scheme has been very successful and very popular. The Department’s Fuel Poverty Strategy “Warmer Healthier Homes” published in March 2011 gave a commitment to improve partnership working and to explore an area based approach to tackling fuel poverty. Northern Ireland’s first independent review of Fuel Poverty “Defining Fuel Poverty in Northern Ireland” (Liddell, Morris, McKenzie and Rae) was published in May 2011 and, among other things, reported that, in order to attain WHO levels of warmth and comfort, more than 33,000 homes in Northern Ireland needed to spend more than a quarter of their income on heating and lighting their homes. This independent review was able to demonstrate that, of those in fuel poverty, a total of 33,000 households in Northern Ireland were in either severe (15-20% needs to spend) or extreme (>20% needs to spend) fuel poverty. This represents more than 11% of all households that are in fuel poverty. This evidence based research provided a rationale for an examination of the Department’s approach to tackling fuel poverty at a time when commentators such as the Consumer Council and the Fuel Poverty Coalition were calling for innovation including an area based approach to tackling fuel poverty.

3. The Warm Home Scheme

3.1 The Warm Homes Scheme is a self-referral scheme and relies upon the householder making an application to the Scheme Managers. The scheme has an annual target of installing energy efficiency improvements in 9,000 homes and has been meeting this target consistently since the new scheme was introduced in July 2009. The scheme provides a range of measures, including insulation of lofts and cavity walls to make homes warmer, healthier and more energy efficient.

3.2 The Warm Homes Scheme has 2 elements:

- Warm Homes is for people who receive certain benefits and own their home or rent it from a private landlord, offering a range of insulation measures with the maximum grant available being £1,500.
- Warm Homes Plus is for those people in receipt of qualifying benefits offering additional insulation and also heating measures, the maximum grant available is £6,500.

3.3 The Warm Homes Scheme has been both popular and successful but the Department is committed to finding and assisting those households most affected by fuel poverty and believes this can be achieved with a more targeted area based model, revised eligibility criteria, and the offer of additional energy efficiency measures.
4. The Affordable Warmth Pilots and Rationale for Change

4.1 The Warm Homes Scheme has been very successful and very popular so any decision to move away from the current self referral Warm Homes Scheme must be based on sound evidence. With the steady increase in the level of fuel poverty we have had to examine our approach providing assistance to those most in need of help particularly those in severe fuel poverty. Despite the success of the Warm Homes Scheme the evidence suggest that those people most in need of help do not self refer and a different approach is needed.

4.2 The Warm Homes Scheme relies heavily on the self-referral method and despite a proactive approach by the Scheme Managers; evidence has suggested that those householders most in need of assistance do not self refer to schemes. For example, an analysis of more than 80,000 referrals to the Warm Homes scheme provided meagre evidence of targeting towards those in most need (Walker et al., 2013). These results can be interpreted in the light of the 2011 Northern Ireland Fuel Poverty Strategy which declared:

“A primary aim of the Fuel Poverty Strategy is to target available resources on those vulnerable households who are most in need of help”

4.3 Walker’s findings challenge a status quo whereby self-referral remains the primary method of entry to the Warm Homes Scheme.

4.4 The Department commissioned the University of Ulster to explore mechanisms for targeting assistance towards those 33,000 households most in need. The University’s report indicated that 13,500 (40%) of these households were likely to be living in cold and energy inefficient homes that cost a great deal to heat, as well as being on low income. This combination of low energy efficiency in the building fabric and low income made them more likely to be experiencing fuel poverty than any other group. They comprised, therefore, the primary target for assistance under the Warm Home Scheme.

4.5 The University of Ulster was tasked to locate this group as accurately as possible through evidence-based analysis. The University of Ulster developed a sophisticated targeting tool using all available data including Geographical Information Systems technology to pinpoint census output areas with a high prevalence of fuel poverty. To test the accuracy of the results the Affordable Warmth Pilot ran in 19 council areas in 2012 and council staff surveyed 2,145 targeted homes. Those homes which met the qualification criteria were referred to the Warm Homes Scheme and were assisted with available measures. A conservative estimate of the targeting system’s accuracy suggests that at least 34% of houses that were contacted proved to be eligible for free energy efficiency measures under the Warm Homes Scheme. Whilst the Northern Ireland regional fuel poverty rate at the time was 42%, the targeting tool identified areas in Northern Ireland which averaged 78% fuel poverty prevalence. The results indicate that the targeting system devised here is currently the most accurate area-based tool available in the UK. The targeting system was also compared with the current status quo for targeting by self-referral into the Warm Homes Scheme via targeted leafleting. The area-based tool was found to be considerably more accurate.

4.6 The success of this pilot, and its targeting mechanism, prompted the Department to test an alternative delivery model for energy efficiency improvements. The University of Ulster’s evaluation of the first Council-led pilot showed that almost 80% of the homes surveyed in the targeted areas were in fuel poverty. Yet, once these surveys were audited in terms of who was eligible for the Warm Homes scheme, only around 50% met the qualification criteria for Warm Homes. Analyses indicated little substantive difference between the group of surveyed households who qualified for Warm Homes, and the group who did not. For example, there was little difference in the incomes coming into households that were eligible for Warm Homes when compared with those that were not. There was also little difference in the energy efficiency ratings of the homes of households that were eligible for the Warm Homes Scheme and those that were not eligible. The primary difference seemed to lie in receipt of passport benefits.

4.7 In September 2013, the Department initiated a Phase 2 Affordable Warmth pilot to test the targeting approach alongside a different model for delivering energy efficiency improvements. The Phase 2 pilot involved the mid Ulster cluster of councils - Cookstown, Dungannon and Magherafelt - and Newtownabbey council to survey 1200 targeted fuel poor homes to assess the energy efficiency of their homes and to determine what appropriate improvements could be delivered to them. The appropriate energy efficiency improvements were delivered by local installers working with the local Housing Executive Grants Office. This was a significant change from the existing Warm Homes Scheme delivery model and involved Housing Executive staff working closely with householders. This allowed the Department the flexibility to introduce some additional measures not available through the Warm Home Scheme including boiler replacement for householders aged over 60 and boiler service where appropriate to the Affordable Warmth Scheme. Some of these changes are reflected in the proposals for additional energy efficiency measures in this consultation.

4.8 The University’s evaluation of the Phase 1 pilot gave considerable guidance on who those most in need are:

- approximately 60% of the houses needing most assistance are modest terraced or semi-detached homes;
- more than half of those most in need are over 60 years old; and
- almost all of them rely on oil for their heating.

4.9 The evaluation has, however, also shown that we can expect a certain degree of reluctance among those most in need, since those in most need are often least likely to accept help, or welcome change in their living arrangements. This consultation seeks advice on how stakeholders believe those most in need can be most effectively engaged to ensure maximum uptake of new measures and funding. The analyses suggested that one of the most effective ways that people in severe fuel poverty can be assisted is through preventing their reliance on secondary heating sources which is necessitated by their current heating systems being old and inefficient.

4.10 All of these findings suggest that it would be possible to improve the targeting of the scheme. The Department wishes to take views on how this may be best achieved.
5. **What are the main changes proposed?**

5.1 The Department proposes to introduce a new model for the delivery of energy efficiency of low income households which builds on the success of Affordable Warmth pilots. The new model will involve the Department working in partnership with the:

- University of Ulster to produce maps and information at council level on areas where fuel poverty is most prevalent;
- Council staff to carry out initial visits to targeted households identified by the University to assess eligibility for assistance;
- Housing Executive to assist the householders and to arrange delivery of energy efficiency improvement measures by local installers.

5.2 While the new scheme will concentrate on visiting homes in targeted areas, scope could potentially be retained for a limited number of vulnerable householders who meet the new qualification criteria to self-refer into the new scheme.

**Proposals for Change**

5.3 The Department proposes to introduce a new Affordable Warmth Scheme which will make some key changes to the:

- delivery model used for the existing Warm Homes Scheme;
- the qualification criteria; and
- the energy efficiency measures available.

These proposals are set out in the following paragraphs.

**Targeting**

Northern Ireland’s first independent review of Fuel Poverty reported that more than 33,000 homes in Northern Ireland needed to spend more than a quarter of their income on heating and lighting their homes. The Department believes that these homes need help most and should be targeted for help in the new Affordable Warmth Scheme.

The Department believes that the Affordable Warmth pilots have demonstrated that a more targeted approach works and brings assistance to those who need it most. The Department proposes to continue with this targeted approach in the new Affordable Warmth Scheme.

**Partnership Working**

The Department proposes to work in partnership with local councils to target households most at risk of fuel poverty and to improve the energy efficiency of their homes. Council staff will conduct an initial home visit to assess both the eligibility and requirements for the householders under the scheme. The Housing Executive’s network of Grant Offices will work closely with the householder and a local installer of the householder’s choice to deliver the energy efficiency improvement measures to the house.
Private Rented

The Warm Homes Scheme was open to applications from owner occupiers and private tenants. Private tenancies currently make up 17% of the housing sector and the Northern Ireland House Condition Survey 2011 reports that 49% of householders in “Privately rented and others” housing were in fuel poverty. Since 2001 the Warm Homes Scheme has improved the energy efficiency of over 19,000 privately rented homes. The Department is committed to continue to improve the energy efficiency of low income tenants who live in privately rented accommodation. However, the Department believes that private landlords have a responsibility to ensure that the properties they are letting have adequate heating systems and adequate insulation. There is evidence that the Warm Homes Scheme improved the energy efficiency of properties of some landlords with large portfolios, over 50 properties in some cases. This was never the intention of the scheme. The Department proposes that where an application is made to the Affordable Warmth Scheme by a tenant living in a privately rented property that the landlord must have registered with the Department’s Landlord Registration Scheme. The Department also proposes that landlords make a 50% contribution towards the cost of the work.

Eligibility

The Department proposes to change the method of assessing eligibility for the scheme by setting an income qualification threshold instead of using social security benefits as a passport. The University of Ulster’s analysis of the first Affordable Warmth pilot “Tackling Fuel Poverty in Northern Ireland, An Area Based Approach to Finding Households Most in Need” (Liddell and McKenzie 2013) concluded that “people were on predominantly low incomes, i.e. half of the households surveyed had an income less than £12,000 per annum and two thirds had an income of less than £16,000 per annum. The Department proposes that the household annual income level be set at a modest level which is in line with other Government programmes, such as the level of income for determining eligibility for free school meals (currently £16,190). The Department proposes that this amount may be adjusted depending on the makeup of the household.

5http://eprints.ulster.ac.uk/27684/1/FINALREPORTFOR_WEB.pdf
Energy Efficiency Measures

The Department proposes to maintain all of the energy efficiency measures available in the existing Warm Homes Scheme. The Department proposes to introduce some additional new measures (see Table 1). The Department proposes to prioritise the measures which most improve the energy efficiency of the home and deliver the highest priority measures within the grant limit.

Table 1

<table>
<thead>
<tr>
<th><strong>Existing Measures</strong></th>
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<tbody>
<tr>
<td>Installation of new gas or oil central heating system where no system currently exists</td>
</tr>
<tr>
<td>Conversion of an existing bottled gas (LPG), solid fuel or Economy 7 heating system to natural gas where available or oil where natural gas is not available</td>
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<tr>
<td>Solid Wall Insulation</td>
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<tr>
<td>Cavity Wall Insulation</td>
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<tr>
<td>Loft Insulation</td>
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<tr>
<td>Hot water tank jacket</td>
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<tr>
<td>Benefits Awareness</td>
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<tr>
<td>Energy Advice</td>
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</tbody>
</table>

<table>
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<tr>
<th><strong>Additional New Measures</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Conversion of an existing Economy 7 heating system to a high efficiency storage heating system</td>
</tr>
<tr>
<td>Boiler replacement for eligible applicants who are aged over 65 and with boilers over 15 years old</td>
</tr>
<tr>
<td>Heating Controls</td>
</tr>
<tr>
<td>Replacement of existing radiators, as needed</td>
</tr>
<tr>
<td>Removal and replacement of ineffective cavity wall insulation</td>
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<tr>
<td>Draught proofing</td>
</tr>
</tbody>
</table>

Self Referrals

The Department proposes that the new scheme is primarily targeted at households identified by the University of Ulster as being most at risk of fuel poverty. The Department seeks views on whether the scheme should continue to include some element of self referral from households not in the areas targeted by councils.

Client Contribution

The Department proposes that the new scheme will deliver appropriate energy efficiency measures to low income households. However, there may be occasions when the installation of a range of energy efficiency improvement measures in a property will exceed the grant limit. This may include “Hard to Heat” properties with no capacity for cavity wall insulation. Where the cost of installing energy efficiency improvement measures exceeds the grant limit the Department proposes that the householder should be allowed to fund the excess amount.
6. **What do we want from this consultation?**

6.1 This consultation aims to review the operation and administration of the provision of energy efficiency improvements for low income households and proposes a new area based targeted approach. The Department would appreciate that having read through the proposed changes that you take time to consider the proposals. The Department welcomes responses from all interested parties on the issues raised and proposals presented in this document. There is a short survey at Annex A, which we would be grateful if you could use to record your responses.

7. **What happens next?**

7.1 Following the end of the consultation period, the Department will publish the responses, in summary form, alongside a Departmental view on the issues raised. Unless respondents indicate otherwise, all responses to this consultation may be published in full or summary form. You should also note that the Department is subject to the Freedom of Information Act 2000. This means that we have to consider any request made to us under the Act for information relating to responses made to this consultation.

8. **Equality Considerations**

8.1 Section 75 of the Northern Ireland Act 1998 requires the Department in carrying out its functions to have due regard to the need to promote equality of opportunity:

- between persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation;
- between men and women generally;
- between persons with a disability and persons without; and
- between persons with dependants and persons without.

8.2 Without prejudice to the obligations set out above, the Department is also required, in carrying out its functions relating to Northern Ireland, to have due regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group.

8.3 Initial screening has been carried out on this consultation to identify any equality impacts. No adverse impacts were found and therefore it has been decided that this review should not be subject to an Equality Impact Assessment. Respondents are asked to comment on any potential equality implications arising from the issues/proposals discussed in this consultation. The decision not to carry out an equality impact assessment will be reassessed following the analysis of the consultation responses.
Your responses to the Consultation

Name: 
Organisation: 
Position in the organisation: 

Proposal 1 – Targeting

Northern Ireland’s first independent review of Fuel Poverty reported that more than 33,000 homes in Northern Ireland needed to spend more than a quarter of their income on heating and lighting their homes. The Department believes that these homes need help most and should be targeted for help in the new Affordable Warmth Scheme.

The Department believes that the Affordable Warmth pilots have demonstrated that a more targeted approach works and brings assistance to those who need it most. The Department proposes to continue with this targeted approach in the new Affordable Warmth Scheme.

How much do you agree with this proposal? (please tick one option)

Strongly agree ☐
Agree ☐
Unsure ☐
Disagree ☐
Strongly disagree ☐
Don’t know ☐

Comments (word limit 75 words)
Proposal 2 - Partnership Working

The Department proposes to work in partnership with local councils to target households most at risk of fuel poverty and to improve the energy efficiency of their homes. Council staff will conduct an initial home visit to assess both the eligibility and requirements for the householders under the scheme. The Housing Executive’s network of Grant Offices will work closely with the householder and a local installer of the householder’s choice to deliver the energy efficiency improvement measures to the house.

How much do you agree with this proposal? (please tick one option)

- Strongly agree
- Agree
- Unsure
- Disagree
- Strongly disagree
- Don’t know

Comments (word limit 75 words)
Proposal 3 – Private Rented

The Warm Homes Scheme was open to applications from owner occupiers and private tenants. Private tenancies currently make up 17% of the housing sector and the Northern Ireland House Condition Survey 2011 reports that 49% of householders in “Privately rented and others” housing were in fuel poverty. Since 2001 the Warm Homes Scheme has improved the energy efficiency of over 19,000 privately rented homes. The Department is committed to continue to improve the energy efficiency of low income tenants who live in privately rented accommodation. However, the Department believes that private landlords have a responsibility to ensure that the properties they are letting have adequate heating systems and adequate insulation. There is evidence that the Warm Homes Scheme improved the energy efficiency of properties of some landlords with large portfolios, over 50 properties in some cases. This was never the intention of the scheme. The Department proposes that where an application is made to the Affordable Warmth Scheme by a tenant living in a privately rented property that the landlord must have registered with the Department’s Landlord Registration Scheme. The Department also proposes that landlords make a 50% contribution towards the cost of the work.

How much do you agree with this proposal? (please tick one option)

- Strongly agree
- Agree
- Unsure
- Disagree
- Strongly disagree
- Don’t know

Comments (word limit 75 words)
Proposal 4 - Eligibility

The Department proposes to change the method of assessing eligibility for the scheme by setting an income qualification threshold instead of using social security benefits as a passport. The University of Ulster’s analysis of the first Affordable Warmth pilot “Tackling Fuel Poverty in Northern Ireland, An Area Based Approach to Finding Households Most in Need”\(^6\) (Liddell and McKenzie 2013) concluded that “people were on predominantly low incomes, i.e. half of the households surveyed had an income less than £12,000 per annum and two thirds had an income of less than £16,000 per annum. The Department proposes that the household annual income level be set at a modest level which is in line with other Government programmes, such as the level of income for determining eligibility for free school meals (currently £16,190). The Department proposes that this amount may be adjusted depending on the makeup of the household.

How much do you agree with this proposal? (please tick one option)

- Strongly agree
- Agree
- Unsure
- Disagree
- Strongly disagree
- Don’t know

Comments (word limit 75 words)

\(^6\)http://eprints.ulster.ac.uk/27684/1/FINALREPORTFOR_WEB.pdf
Proposal 5 – Energy Efficiency Measures

The Department proposes to maintain all of the energy efficiency measures available in the existing Warm Homes Scheme. The Department proposes to introduce some additional new measures (see Table 1). The Department proposes to prioritise the measures which most improve the energy efficiency of the home and deliver the highest priority measures within the grant limit.

How much do you agree with the introduction of the new measures on Table 1? (please tick one option)

- Strongly agree
- Agree
- Unsure
- Disagree
- Strongly disagree
- Don’t know

Comments (word limit 75 words)
Proposal 6 – Self Referrals

The Department proposes that the new scheme is primarily targeted at households identified by the University of Ulster as being most at risk of fuel poverty. The Department seeks views on whether the scheme should continue to include some element of self referral from households not in the areas targeted by councils.

How much do you agree with this proposal? (please tick one option)

- Strongly agree
- Agree
- Unsure
- Disagree
- Strongly disagree
- Don't know

Comments (word limit 75 words)
Proposal 7 – Client Contribution

The Department proposes to set a grant limit which will deliver appropriate energy efficiency measures to low income households. However, there may be occasions when the installation of a range of energy efficiency improvement measures in a property will exceed the grant limit. This may include “Hard to Heat” properties with no capacity for cavity wall insulation. Where the cost of installing energy efficiency improvement measures exceeds the grant limit the Department proposes that the householder should be allowed to fund the excess amount.

How much do you agree with this proposal? (please tick one option)

Strongly agree □
Agree □
Unsure □
Disagree □
Strongly disagree □
Don’t know □

Comments (word limit 75 words)
Other Comments

Are there any additional comments or suggestions you wish to make on the proposals in the consultation document?

Comments (word limit 75 words)
Annex B

Consultee List

All MPs and MEPs
All Northern Ireland Political Parties
All MLAs
All Northern Ireland Departments
Social Development Committee
Speaker of the Assembly
Northern Ireland Office
Citizens Advice Bureaux
Housing Rights Service
Northern Ireland Housing Executive
Northern Ireland Housing Council
Chartered Institute of Housing
The Executive Council of the Inn of Court of Northern Ireland
Belfast Solicitors Association
The Law Society of Northern Ireland
School of Law University of Ulster
Laganside Courts
Institute of Professional Legal Studies (Queens University Belfast)
Law Centre (Northern Ireland)
Secretary, Her Majesty’s Council of County Court Judges
Northern Ireland Court Service
Northern Ireland Law Commission
Civil Law Reform Division
Civic Forum
North/South Ministerial Council
Northern Ireland Resident Magistrates’ Association
Human Rights Commission
Northern Ireland Ombudsman
Equality Commission for Northern Ireland
The General Consumer Council for Northern Ireland
Confederation of British Industry Northern Ireland Branch
Northern Ireland Chamber of Commerce and Industry
Federation of Small Businesses
Northern Ireland Association of Citizens Advice Bureaux
Northern Ireland Chamber of Trade
The Northern Ireland Council for Voluntary Action
Northern Ireland Congress, Irish Congress of Trade Unions
Northern Ireland Local Government Association
Society of Local Authority Chief Executives