

19th August 2026

Joint Submission to the Consultation on the NI Warm Healthy Homes Fund

Introduction

This joint submission to the consultation on Northern Ireland's Warm Healthy Homes Fund has been prepared by the National Women's Council and Environmental Justice Network Ireland.

It was not mandatory to give a response to all of the questions in the consultation – questions 7, 8 and 9 were not answered in this submission.

National Women's Council

The National Women's Council (NWC) is the leading national representative organisation for women and women's groups in Ireland, founded in 1973. We have almost 200 member groups and a large and growing community of individual supporters. The ambition of the National Women's Council is an Ireland where every woman enjoys true equality and no woman is left behind. This ambition shapes and informs our work, and, with our living values, how we work.

We are a movement-building organisation rooted in our membership, working on the whole island of Ireland. We are also part of the international movement to protect and advance women's and girls' rights. Our purpose is to lead action for the achievement of women's and girls' equality through mobilising, influencing, and building solidarity.

NWC's current Strategic Plan *Time to Act for Women's Rights and Equality* aims to grow feminist communities for climate justice and to embed feminist climate justice in climate policy and action across the island of Ireland, ensuring that gender equality is central to all climate solutions.

Environmental Justice Network Ireland

Environmental Justice Network Ireland (EJNI) is a community of practice connecting interdisciplinary academic researchers, NGOs and environmental lawyers with community campaigners who have emerged over the last decade on the island of Ireland in response to serious environmental governance failures.

EJNI's aim is to enhance knowledge about complex environmental and legal issues that exist on the island of Ireland and to use this knowledge to push for meaningful, positive changes that will have a tangible impact on addressing the root causes of environmental and social injustice on the island of Ireland.

EJNI's goal is to address the root causes of environmental and social injustice on the island of Ireland through an innovative, transdisciplinary model of collaboration which draws together diverse stakeholders and decision-makers to enhance knowledge exchange and facilitate more effective and strategic research, advocacy and action.

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.

This is an improved eligibility criteria that aims to target low-income households and vulnerable groups. We welcome the much-needed increased income threshold (compared to the £23000 threshold of the current Affordable Warmth Scheme) and the acknowledgement that flexibility will be built into the eligibility criteria to reflect cost of living. We would also recommend that flexibility should be built into the criteria to reflect ongoing energy price volatility, especially considering [energy costs in NI](#) are still double what they were pre-covid.

The new WHHF must reflect accurate and updated data. For example, the WHHF consultation is still relying on an outdated and insufficient methodology to define fuel poverty (10% income indicator) – for the most recent modelled fuel poverty estimate it uses 2016 baseline data, which estimates a fuel poverty figure of 24% in 2021. However, [a report](#) published by the National Energy Action in October 2024 estimated 40% of households in Northern Ireland are living in fuel poverty. The new [fuel poverty strategy](#) acknowledged the limitations of this methodology and aims to improve the understanding of fuel poverty by “*using more frequent and varied data sources*” that better capture people’s experience of fuel poverty and energy affordability. The needs based and flexible approach used to guide the work of the fuel poverty strategy should also be reflected in both the eligibility criteria and prioritisation mechanisms of the Warm Healthy Homes Fund.

Better targeted data results in more equitable action which aligns with both the fuel poverty strategy and the just transition principles of NI’s Climate Act. The Government can use the roll out of this fund to address serious data gaps on fuel poverty, energy efficiency and vulnerability. In addition, Rural Community Network [recommends](#) that the Department combines quantitative data

with lived experience supported by continued engagement with communities to fill data gaps and ensure accurate identification of vulnerable rural households that may otherwise be invisible in official statistics. Equally, it should be recognised that using Universal Credit as an eligibility threshold may exclude rural households considering [research](#) commissioned by the Department itself found that there are real barriers for self-employed and rural households in accessing Universal credit.

Finally, the WHHF should provide for consistent monitoring of outcomes to ensure that the eligibility criteria and prioritisation methodology is effective in targeting the most vulnerable households, meeting energy efficiency targets and not unintentionally excluding particular vulnerable groups.

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.

We would disagree with the proposed approach for household savings when assessing eligibility for the scheme and argue that such criteria would deter low-income households from applying for it. Research has shown that liquid savings have a negligible impact on experiencing energy poverty - the greatest indicator is the energy efficiency of the property itself - and that savings-related eligibility criteria deter people living in energy inefficient households from applying for energy efficiency upgrade schemes.

The multidimensional nature of energy poverty shows time and time again in research that the energy efficiency of the home; household income; and the cost of energy itself are the dimensions which have the greatest impact on experiencing energy poverty.

Many low-income households are eating into savings to deal with the increased cost-of-living, resulting in damaging long-term effects to mental health and stress levels - particularly for

households with children. Savings for many low-income households in the current economic climate are the difference between putting food on the table or going without and are used only in an emergency - they should not be considered as freely usable disposable income.

If a “more generous approach” is proposed for the savings criteria for those aged 60 and over, then this “more generous approach” must also apply to other more vulnerable groups with £6,000 in personal savings, such as those on a Customer/Critical Care Register or with an annual household income totalling under £29,741.40. It makes more sense for the scheme to do away with the savings criteria and instead further refine its prioritisation of applicants (proposals included below), or to use the proposed “more generous approach” for all applications.

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.

We agree with the Department’s proposal to prioritise applications based on the EPC rating of the property, and suggest that additional priority should be given to properties with low EPC ratings combined with one or more of the following:

- Inhabitant on a Customer/Critical Care Register
- Inhabitant with chronic health issue or disability requiring the use of medical equipment in the home
- Inhabitant in receipt of Pension Credit
- Annual household income totalling under £29,741.40

Further additional priority should be given to applications where these circumstances ‘stack’ - for example, higher priority should be given to an application where the property has a low EPC and is inhabited by an individual in receipt of Pension Credit and registered on a Customer/Critical Care Register. This would be [similar to Spain’s social energy tariff](#), which has a tiered set of discounts for energy bills for households meeting a set of eligibility criteria - discounts are deepened for those who have a ‘stack’ of the eligibility criteria.

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.

The new scheme must address the barriers identified from the implementation of the existing Affordable Warmth Scheme. For example, only 5-8% of landlords took up the 50% government funding allowance as part of the current Affordable Warmth Scheme to implement energy efficient upgrades. While we hope that fully funded access to some energy efficiency improvements will increase uptake, we are concerned that the proposed scheme does not seem to offer sufficient solutions to the issues highlighted by the low uptake of AWS by private landlords, and we are concerned that the introduction of MEES legislation will not take place until after the deadline for this consultation. This creates the potential for the WHHF to be poor in its compatibility with the legislation when it is introduced, creating further barriers and lack of incentive for landlords to engage with WHHF. Poor participation rates from landlords in WHHF must be avoided at all costs as rates of fuel poverty are highest in the private rental sector.

In addition, the introduction of MEES legislation should be aligned with revised and updated Fitness Standards. NI’s Fuel Poverty Strategy acknowledged that the current Fitness Standard for housing is

outdated, and does not sufficiently address energy efficiency, inadequate heating or health risks. Without a strong statutory basis and accountability for fuel poverty reduction and the improvement of energy efficiency standards, achieving the ambitious objectives of the WHHF in the Private Rented Sector will be challenging. Improvement of housing standards should simultaneously take place alongside investment in energy efficiency upgrades.

If the works to be carried out on a rental property are extensive and require the tenant to vacate the property, protections must be provided to prevent 'renovictions' of tenants to re-rent the property at a higher price accrued by improved EPC to a new tenant. Protections for tenants in private rental properties should be built into the final scheme.

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.

If the Department for Communities' long-term ambition for the fund is to improve the energy efficiency of Northern Ireland's housing stock *and* reduce carbon emissions, grant money for works should not be used to repair fossil fuel powered boilers and should instead be used to install low-carbon heating systems.

As one of the key dimensions linked to experiencing energy poverty is the cost of energy itself, retaining fossil fuel powered boilers in the homes of those vulnerable to energy poverty leaves them exposed to the volatile nature of fossil fuel energy pricing. The Russian invasion of Ukraine and the ongoing conflict between America and Iran have both caused spikes in energy prices due to continued heavy reliance on oil and gas as energy sources.

A fabric first approach already creates the ideal conditions for a heat pump to be installed into many households. We also recognise that heat pumps will not be suitable for all households - [alternative green heating sources](#) should be identified to suit the household in question where required.

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.

Consideration for second applications should be given in the event of life-altering events or injuries to a previous applicant. Life-altering injuries can result in a loss of income, career or livelihood immediately for a previous applicant; can make them more or entirely reliant on additional medical equipment; and make them more vulnerable to experiencing energy poverty than in a previous application.

As proposed above, a second application should be given higher priority if it now includes an inhabitant with chronic health issues or disabilities which require the use of electrical equipment, or an inhabitant on a Customer/Critical Care Register.

Ensuring the most vulnerable households benefit from WHHF should be its main objective - the fund should allow for flexibility, especially if the eligibility criteria are not addressing fuel poverty and/or achieving energy efficiency targets in line with objectives of the long-term fuel poverty strategy. Excluding second applications - particularly if they involve households now meeting the established criteria - should not be a priority of the scheme.

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.

We propose that two aftercare visits are included for all applicants - one within a week of works being completed, and a second visit in the six-to-twelve-week window initially proposed. Incorrect use of heat pumps can greatly increase energy bills, and this must be avoided at all costs for recipients of the Warm Healthy Homes Fund who are receiving the works due to their vulnerability to energy poverty. A six-week period could potentially mean inhabitants of a home using a heat pump incorrectly for 42 days, and the maximum twelve-week window could result in 84 days of incorrect use - an aftercare visit within the week that works are completed can reduce the risk of prolonged incorrect use of new technologies.

If the pool of registered contractors meeting the proposed accreditation to complete home upgrades is limited, having them carry out multiple aftercare visits risks slowing down future home upgrades. We propose that assigned individuals working within LGDs are upskilled to provide aftercare visits to homes in their districts, or that a new position is created within LGDs to fulfil this purpose. These positions could also act as a trial/pilot for the One Stop Shop approach proposed in the Energy Strategy for Northern Ireland (2021) and ensure that aftercare support is locally available whilst allowing contractors to continue working on upgrading more homes.

Aftercare visits should monitor the impact of completed works on energy affordability. This monitoring could take a qualitative and quantitative form, combining a set of questions asked of the owner as well as examination of energy bills and a meter reading.

Equality Considerations

Question 11

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

- Similar to retrofitting schemes in the Republic of Ireland, the proposed scheme has no provisions for members of the Traveller community who live in caravans/trailers despite their disproportionate exposure to energy poverty. The Traveller Money & Budgeting Service in the South have proposed a state-financed rent-to-buy scheme of more energy efficient mobile accommodation as one way of addressing this issue, particularly as many existing caravans/trailers are of sub-standard quality and very energy inefficient.
- We regret that neither the proposed Warm Healthy Homes Fund (and its consultation) nor Northern Ireland's new Fuel Poverty strategy does not outline specific targeted measures for households and communities living on Rathlin island. As an offshore Island, it has been challenged significantly by heavy reliance on imported fossil fuels and residential homes [consume](#) approximately 40% more energy than mainland homes owing in part to the lower-than average levels of home insulation. The largest [contributions](#) of per capita sectoral emissions for Rathlin Island come from residential energy demand and transport fuels, with heating oil making up 75% of the total energy use of the island. Using a territorial based approach, retrofitting the households on Rathlin Island from an assumed E to a C EPC rating would result in a reduction of 48 tonnes of CO2 in the building sector. ([Northern Ireland Case](#)

[Study Pilot: Quantitative Greenhouse Gas Impact Assessment Method for Spatial Planning Policy, September 2022](#)). Oil boilers are the most common source of heating on the island,

followed by stoves and solid fuel boilers. Unique challenges in upgrading the energy efficiency of homes on the island should be taken into consideration. Some challenges highlighted by the inhabited islands in the South include the transport of required materials to the islands via ferry - adding a haulage cost to works for inhabitants - and a reluctance from contractors to complete works on the islands due to additional costs including transport to the islands and accommodation costs for workers.

Although it is likely outside of the scope of the proposed Healthy Homes Fund, there is a need to support and adequately fund the proactive work of the [Rathlin Development and Community Association \(RCDA\)](#) including their recent initiative “Destination Green” that acts as a community led decarbonisation strategy for the island.

- The introduction of WHHF should be used as an opportunity to create a dedicated plan to address the unavailability of localised energy data across Northern Ireland or a dedicated citizen science platform. The Government is currently reliant on community-based organisations and students to carry out energy audits and fill these energy data gaps.
- Neither the proposed Warm Healthy Homes Fund nor Fuel Poverty Strategy address the impacts of fuel poverty on young people - a vulnerable group that remains largely absent from energy poverty data and policy measures. Half of young people live in the private rental sector, already identified as the sector with the highest rates of fuel poverty. Clarity on the potential impact of student maintenance loans on eligibility for WHHF should be explicit.
- The Warm Healthy Homes Fund must incorporate and consider broader equality considerations in its objectives and implementation, understanding the interconnectedness of poor housing, high energy costs, poverty and health.
- We endorse the recommendations of [NI’s Rural Community Network](#) for the WHHF consultation to ensure that the rural households are able to access the fund equitably, while considerations for the specific needs of rural households are reflected in the design and implementation of the WHHF. This includes recognising community organisations as key partners in delivery of the scheme to improve accessibility and uptake.
- Northern Ireland’s decarbonisation in the residential buildings sector must not increase energy costs for low-income households/vulnerable groups or worsen fuel poverty. Research by the [Consumer Council NI](#) found that increase in energy costs was the primary concern for households when it came to decarbonisation. Therefore, we endorse the NEA recommendation that the Government adopts adequate mitigations and progressive funding mechanisms to ensure that the costs of NI’s transition are fairly distributed and do not disproportionately impact low-income households, in line with the just transition principles of NI’s Climate Act.

- Energy poverty is a cross-cutting policy issue. The WHHF should align with preexisting and future strategies, policies and/or legislation in the areas of energy, housing, poverty and climate. This should include alignment with the NI Anti-Poverty Strategy, NI Climate Action Plan and upcoming MEES legislation for private rental properties, amongst others.