

**Department for Communities Consultation on a draft Fuel Poverty Strategy Northern Ireland**

**Response from Propertymark**

**March 2025**

**Background**

1. Propertymark is the UK's leading professional body of property agents, with over 18,500 members representing over 12,800 branches. We are member-led with a Board which is made up of practicing agents and we work closely with our members to set professional standards through regulation, accredited and recognised qualifications, an industry-leading training programme and mandatory Continuing Professional Development.<sup>1</sup>

**Consultation – overview**

2. The Department for Communities has produced a draft fuel poverty strategy that is the Northern Ireland Executive's proposed long-term framework for addressing fuel poverty and its impacts. The objectives of the strategy are as follows:
  - Make homes more energy efficient
  - Collaborate and build capacity
  - Protect consumers
3. The full draft poverty strategy can be read here: [Consultation on a draft fuel Poverty Strategy](#)

**Propertymark response – summary**

4. Propertymark welcomes the opportunity to respond to and be involved in the Department for Communities' Fuel Poverty Strategy. Ultimately, we support measures taken to support people meet their energy costs. From a property agents' perspective, the lack of taking action leads to disruption within the property sector. For renters, the inability to pay energy bills leads to rising rent arrears and possible evictions. For homeowners with mortgages, this can help ensure that they can remain in their property. Additionally, cutting down on heating can contribute to the deterioration of properties, especially those which are not well ventilated.

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<sup>1</sup> <https://www.propertymark.co.uk/>

5. Propertymark's response has been influenced by the following three positions:

- **Ensuring vulnerable tenants are supported** – for questions that also impact tenants in fuel poverty, our goal is to ensure that tenants are protected so they do not face the potential of rent arrears and evictions. Ensuring that tenants can remain in properties provides security for both tenants and landlords.
- **Improving access to energy efficient homes** – we are supportive of steps taken to improve energy efficiency and remediation of homes. The costs for this however must be understood with sufficient financial resources provided for homeowners and landlords to make effective energy efficiency improvements.
- **Taking best practice from other UK nations** – our experience with the policies of other UK nations has given us a good understanding of what works and policies that have been less successful. Our response includes reference to actions taken by other devolved governments that the Department for Communities may wish to consider.

## **Questions**

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

6. Propertymark welcomes the four guiding principles of the fuel poverty strategy. We welcome the commitment to long-term sustainable solutions, which given the synergy between eradicating fuel poverty and decarbonisation, the strategy aims will be aligned with the Climate Change Act (Northern Ireland) 2022.<sup>2</sup> Equally we welcome the commitment to support both those in fuel poverty and to support those at risk of fuel poverty, which is a similar aim to other approaches to fuel poverty from across the United Kingdom including in Wales.<sup>3</sup>
7. Propertymark also welcomes the principle of empowering people and communities to seek long-term solutions, recognising and removing barriers, and enhancing the capacity and confidence of fuel poor to seek support. Finally, we welcome the collaborative principle in that the strategy will

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<sup>2</sup> [Climate Change Act \(Northern Ireland\) 2022](#)

<sup>33</sup> [Tackling fuel poverty 2021 to 2035 \[HTML\] | GOV.WALES](#)

build partnerships, referral networks and collaboration across all sectors of society. We hope that in the spirit of this principle, the Northern Ireland Executive will adopt a tenure blind approach to tackling fuel poverty in that all housing tenures (owner-occupied, private rented and social rented) are given adequate support.

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

8. Propertymark welcomes the long-term timeframe that the Strategy will offer over a ten-year period to 2035. We have already outlined the synergies between tackling fuel poverty and decarbonisation. Given that the Climate Change Act (Northern Ireland) 2022 sets a target of an at least 100% reduction in net zero greenhouse gas (GHG) emissions by 2050, we would recommend that the strategy considers a new strategy following 2035.
9. Propertymark also welcomes a review of the strategy at the halfway point in 2030. This would give the Northern Ireland Government an opportunity to assess how effective the strategy has been. However, we would recommend that officials of the Northern Ireland Executive should monitor the strategy on an annual basis and brief the relevant Ministers accordingly.

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

10. The Decent Homes Standard<sup>4</sup>, and how it impacts Northern Ireland, states that properties should provide a reasonable degree of comfort and that this should require efficient heating systems and installation. In achieving thermal comfort, we think that the priority should be on achieving higher standards of insulation by improving the fabric of buildings. Once a building fabric has been improved sufficiently to lower carbon emissions and reduce costs, ultimately ensuring that buildings are warmer in the winter and cooler in the summer, energy efficiency improvements should only then look at heating systems and extras such as photovoltaics.
11. The UK Government, via the Ministry of Housing, Communities and Local Government are looking at a review of Energy Performance Certificates (EPCs) in England and Wales through reforms to the energy performance of buildings regime<sup>5</sup>. The Northern Ireland Executive may wish to consider

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<sup>4</sup> [Decent homes standard | Department for Communities](#)

<sup>5</sup> [Reforms to the Energy Performance of Buildings regime - GOV.UK](#)

some of the reforms that feed in to proposed EPCs in England and Wales. For domestic buildings, the Energy Efficiency Rating (EER) is the headline metric, calculated using modelled energy costs per square metre based on standardised heating patterns, temperatures, and fixed fuel price assumptions.

**Question 4: For MEES in PRS to effectively alleviate fuel poverty, what information or data do you think would be useful and what barriers would we need to overcome?**

12. For MEES to be introduced to the private rented sector in Northern Ireland to effectively alleviate fuel poverty there are three barriers that would need to be overcome before implementation:

- **Realistic timetable for implementation** - there needs to be a realistic timetable that is fair to landlords and their property agents to achieve. Currently in England and Wales, landlords must meet EPC E to be marketed to let subject to exemptions.<sup>6</sup> However, the UK Government are consulting on increasing these standards to EPC C by 2030 for existing tenancies and EPC C by 2028 for all new tenancies<sup>7</sup>. Northern Ireland would have to outline a fair timetable in landlords' contribution to Net Zero by 2050 that is realistic given the head start that landlords in England and Wales have had.
- **Sensible exemptions** - the UK Government, as part of their ongoing consultation, are considering a review of exemptions to the MEES. This includes consideration of discontinuing an exemption for heritage properties and in particular properties that are Grade II and Grade I listed buildings and within conservation areas. We have warned the UK Government against abolishing this exemption as energy efficiency measures could radically change the character and value of certain properties. We would recommend to the Northern Ireland Government that they consider the level of heritage properties within Northern Ireland and support landlords and property agents to maintain their character.
- **Any cost cap must reflect property values** - one of the biggest barriers to landlords and property agents to decarbonise in Northern Ireland is the difference between property prices and the level of investment. The average house price is £306,494 in England, £219,446 in Wales, and £195,036 in Scotland, according to Land Registry data for November 2024. In the

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<sup>6</sup> [Domestic private rented property: minimum energy efficiency standard - landlord guidance - GOV.UK](#)

<sup>7</sup> [Improving the energy performance of privately rented homes in England and Wales - 2025 update - Department for Energy Security and Net Zero - Citizen Space](#)

third quarter of 2024, the average property price in Northern Ireland was £190,553<sup>8</sup>. Currently, landlords and their property agents have a £3,500 cost cap to achieve EPC E. However, as part of the UK Government's consultation they are considering increasing the cost cap to £15,000. If Northern Ireland wished to emulate a similar cost cap, then the cost cap would prove more costly to landlords operating in Belfast than those operating in Braintree in the South East of England. Accordingly, we recommend that the Northern Ireland Executive should introduce a cost cap that reflects property values in Northern Ireland.

13. For MEES to be introduced to the private rented sector in Northern Ireland to effectively alleviate fuel poverty there are two important sets of information and data that are needed be overcome before implementation:

- **Understand current ratings of rented property** - there would also have to be an assessment of current EPC levels in properties across Northern Ireland to understand the scale of the challenge. This is also important to ensure that targets are realistic and achievable and can also help the Department understand the types of property that will need to be exempt or will struggle to improve the energy efficiency.
- **Number of installers and supply chains** - An additional challenge to all areas of the United Kingdom is the lack of energy efficiency installers which is more problematic in some areas particularly remote and rural areas where energy efficiency installers are in limited supply. This can also increase the costs to consumers and the propensity of rogue traders to exploit vulnerable groups.

14. Of course, this is not an exhaustive list of potential barriers to landlords and property agents in decarbonising their stock. We would recommend that the Northern Ireland Executive further engages with Propertymark members in Northern Ireland to investigate the potential barriers and solutions in the form of a roundtable discussion.

**Question 5: Should MEES also be applied to other tenures? Please give reasons for your answer.**

15. Propertymark agrees that there should be similar standards for social housing than in the private rented sector. While it is correct that some of the least energy efficient housing is in the private

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<sup>8</sup> Source: HM Land Registry. Figures for England, Scotland, Wales and different regions are for December 2024. Figures for Northern Ireland are for Q4 2024. Correct as at 19 February 2025.

rented sector, this is due to the age of stock where there is a high proportion of dwellings built pre-1919. However, while there is a high proportion of social homes that are relatively new builds, significant proportions of social housing are stock transferred from local authorities where there could be grounds for improvement. Furthermore, as a comparison, currently, there are no energy efficiency standards in England and Wales. However, the UK Government are considering introduction of MEES for social homes.<sup>9</sup> In Scotland, the Scottish Government have introduced the Energy Efficiency Standard for Social Housing. The Energy Efficiency Standard for Social Housing (EESH) aims to encourage landlords to improve the energy efficiency of social housing in Scotland. It sets a single minimum Energy Efficiency (EE) rating for landlords to achieve that varies dependent upon the dwelling type and the fuel type used to heat it<sup>10</sup>. We think this could be a good opportunity for the Northern Ireland Executive to introduce MEES for both sectors and to level the playing field between social housing and private landlords.

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

16. Propertymark agrees that introducing updated fitness standards will contribute to making homes more energy efficient. The current Fitness Standard is a basic standard for human habitation as set out in Article 46 of the Housing (NI) Order 1981<sup>11</sup>. This concentrates on the very basics of housing standards such as adequate water, soundness of buildings and heating, lighting and ventilation. Updated standards could consider the threats to health when building temperatures fall below the minimum satisfactory levels for relatively long periods, as well as the impact. Furthermore, the updated standard could consider the impact of damp and mould which is commonly as a result of poor ventilation and increased humidity.

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

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<sup>9</sup> <https://www.gov.uk/government/news/home-upgrade-revolution-as-renters-set-for-warmer-homes-and-cheaper-bills>

<sup>10</sup> <https://www.gov.scot/binaries/content/documents/govscot/publications/advice-and-guidance/2020/03/energy-efficiency-standard-social-housing-eesh-scottish-government-guidance-social-landlords-revised-2020/documents/energy-efficiency-standard-social-housing-eesh-scottish-government-guidance-social-landlords/energy-efficiency-standard-social-housing-eesh-scottish-government-guidance-social-landlords/govscot%3Adocument/energy-efficiency-standard-social-housing-eesh-scottish-government-guidance-social-landlords.pdf>

<sup>11</sup> <https://www.legislation.gov.uk/nisi/1981/156/contents>

17. Propertymark agrees that all government domestic energy schemes should take account of the Fuel Poverty Strategy principles. Although the phenomenon of decarbonisation has synergies with the aim of eradicating fuel poverty, the aims are not always interlinked. For example, the best way to eradicate fuel poverty would be to install gas to fuel poor households as a cheap form of energy. However, this would be contrary to the aims of decarbonisation. We recommend that both aims are interlinked to ensure the aims of one scheme is not undermining the other.

**Question 8: Do you agree that DfC should take a more flexible approach that considers current data when setting and reviewing income thresholds and eligibility criteria? Please give reasons for your answer.**

18. Propertymark understands that the income threshold and eligibility criteria for the Affordable Warmth Scheme are currently set in legislation within the Domestic Energy Efficiency Grants Regulations (Northern Ireland) 2009<sup>12</sup>. In our experience, any grant funding schemes that have an eligibility criterion can serve as a barrier to take up. For example, in grant funding schemes where the tenant must be on a means test benefit, be below a certain household income or be particularly vulnerable to the cold, a landlord or their property agent is unlikely to know this personal information about their tenant. It is also considered intrusive to ask this information. Therefore, we recommend that any grant funding schemes concentrate on the energy performance of the property and concentrate on the lowest performing EPCs. This is particularly useful in the private rented sector, where tenancies are more transient and can benefit future tenants for might be vulnerable.

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

19. If the Northern Ireland Executive wishes to use income as an eligibility criterion, we recommend that this threshold should rise in line with inflation. The Consumer Price Index (CPI) broadly reflects the changing cost of living and is increasingly used by government departments as the link for welfare payments. The Retail Price Index (RPI) includes housing costs, but is responsive to changes in interest rates that may affect landlords' borrowing costs. Wage inflation is the historical benchmark for rental growth, and could be perceived as fairer, though can mask variation in

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<sup>12</sup> <https://www.legislation.gov.uk/nisr/2009/195/contents>

regional and sectoral wage growth that could result in disproportionately negative effects on some groups.

**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.**

20. Propertymark agrees and that eligibility criteria should concentrate on the least energy efficient homes which would likely be those homes that have an EPC rating D to G. We think that targeting these properties would be sensible as they would require the greatest costs and time to get to a sufficient standard. The strong likelihood is also that these properties are more likely to contain vulnerable tenants.

**Question 11: Do you agree that the new scheme should continue with the Whole House retrofit approach? Please give reasons for your answer.**

21. Propertymark agrees that the new scheme should continue with the Whole House retrofit approach. We recognise the importance of improving the building fabric and improving the efficiency of heating system as well as introducing measures such as photovoltaics. However, we strongly advocate that any schemes take a fabric first approach as priority. This would ensure that landlords prioritise the improvement of the building fabric such as wall and roof installation as a priority. This is important because if the building fabric is inefficient, then the benefits of improved heating systems will not be fully utilised. Central to a fabric first approach is also the concept that by improving the building fabric as a priority, the occupant will require less energy output and there will be less demand on heating systems.

**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**

22. Propertymark agrees that if the Whole House approach is used, that all recommended measures must be installed unless there are exceptional reasons not to.

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



23. As we have already outlined, the priority on energy efficiency must be on the building fabric. We have already outlined the advantages of taking a fabric first approach. However, once the building fabric has been improved, we also recognise the advantages of improving the efficiency of heating systems, and that this could be an opportunity where the aims of decarbonisation and tackling fuel poverty are met. Once the building fabric has been improved there would certainly be scope for improving heating systems to appropriate properties that can install air source and ground source heat pumps. Local authorities could aid this by giving homeowners advice on the installation of improved heating systems and permitted development rights for heat pumps.

**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 provide reasons for your answer.**

24. Propertymark agrees that the scheme should offer renewable technologies such as photovoltaics and battery storage. However, the priority should be firstly in improving the fabric of buildings followed by the efficiency of heating systems. If a property has exhausted all improvements with regards to building fabric and improved heating systems, and is still not at a sufficient EPC standard, then consideration of additional technologies could be considered.

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

25. Propertymark recognises that people living in rural areas of Northern Ireland face additional challenges in relation to deprivation and poverty. These challenges include limited access to services, higher living costs and isolation. According to the Department of Agriculture, Environment and Rural Affairs, rural pensioners are particularly vulnerable with 19% of rural pensioners living in relative poverty compared to 13% in urban areas<sup>13</sup>.

26. Rural properties generally face additional challenges in terms of energy efficiency due to the building type, geographic location and limitations with infrastructure. Many remote locations are off grid meaning limited heating options, with householders frequently having to rely on

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<sup>13</sup> <https://www.daera-ni.gov.uk/articles/tackling-rural-poverty-social-isolation-new-framework#:~:text=The%20Tackling%20Rural%20Poverty%20and,measures%20which%20target%20the%20needs>

alternative energy sources to mains gas. In addition, many rural buildings are older and have unique characteristics that are difficult to heat such as thatched roofs. Accordingly, we agree that there could be an opportunity not to prioritise rural properties, but to offer a ring-fenced scheme to ensure that rural properties have sufficient support to improve their energy efficiency. This could be a scheme open to certain communities that are characterised as rural.

**Question 16: Do you agree with a sliding scale approach to funding for home energy schemes? Please provide reasons for your answer.**

27. Propertymark thinks that the Northern Ireland Executive should reduce eligibility criteria for funding schemes and should concentrate on the least energy efficient homes. Effectively those that have an EPC D-G. Given the transient nature of the private rented sector, by taking this approach the scheme could benefit future tenants who may be vulnerable. However, if the Northern Ireland Executive do wish to continue adopting an eligibility criterion based on income or if the occupant is on a means tested benefit, then we do recognise virtue in adopting a sliding scale whereby those occupants in need great the greatest support. Criteria should be easily understood and should not be overly burdensome to hinder access for landlords or their tenants to utilise.

**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?**

28. Propertymark favours grant funding opportunities for the least energy efficient buildings that are the hardest to heat or have particularly vulnerable tenants such as those on benefits, on a low household income or are particularly vulnerable to the cold. Grant funding for landlords is important because it allows them to make energy efficiency improvements to their rental properties without having to solely bear the cost, ultimately benefiting tenants by providing better living conditions, lowering utility bills, and reducing the building's carbon emissions.

29. In relation to loans, in Scotland, the Home Energy Scotland scheme allows registered private sector landlords access to the Private Rented Sector Landlord Loan<sup>14</sup> for various energy efficiency improvements to their properties. For each property a private landlord owns, there's funding of up to £15,000 in interest free loans for energy efficiency improvements and up to £17,500 for

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<sup>14</sup> [Private Rented Sector Landlord Loan | Home Energy Scotland](#)

combined renewable energy systems. The Development Bank for Wales are considering similar schemes.<sup>15</sup> Consequently, Propertymark recommends that the Northern Ireland Government offers a similar interest free loan system as the Home Energy Scotland Scheme that is open to landlords and is limited in eligibility criteria to ensure take up is maximised.

**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.**

30. We are open to the possibility of increasing levies from electricity bills in order to fund energy efficiency schemes for low-income households. Increasing bills by an affordable amount for a large number of households is likely to have less of a negative impact than failing to support low-income households to meet energy efficiency requirements. Based on the 2021 Census, there are an estimated 770,000 households in Northern Ireland. Increasing levies, even as low as £5 a month, could raise £46,200,000 a year. This can ensure more properties can reach minimum energy efficiency standards, reducing bills and improving the quality of homes for thousands of low-income households every year at an unnoticeable cost.

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

31. We would also be open to the possibility of introducing levies on gas as long as the following three stipulations are met. Firstly, this should only be introduced if levies from electricity bills are not enough to cover the costs of energy efficiency measures. Secondly, the levy should not be raised to levels that would negatively impact low-income households. Thirdly, levies should only be introduced if it can be evidenced that the amount spent will lead to additional financial benefits for homeowners in Northern Ireland such as in the form of cheaper bills and a reduction in the severity of climate change.

**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?**

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<sup>15</sup> <https://developmentbank.wales/green-homes-wales>

32. We would caution against introducing levies on home heating oil. This is a heating system mostly used by low-income households who may face additional challenges from an increase in their energy bills.

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

33. We agree that referral pathways have the potential to be an effective method of identifying individuals in fuel poverty. The organisations tasked with referring people experiencing fuel poverty would need explicit criteria that would need to be met in order for a person to be referred. This would also necessitate a commitment from all organisations involved to commit to a set number of referrals or to adopt referrals into their regular working practices. This would also require a new taskforce to verify referrals and to facilitate financial support.

**Question 22: Do you agree with a taskforce/working group to develop enabling frameworks for Energy Communities?**

34. We agree with that a taskforce should be created to support the creation of energy communities. As noted within the consultation document, communities that would benefit the most from community energy partnerships would not always be in a position to create one of their own. Therefore, a taskforce that would enable them to do so would be beneficial.

**Question 23: Do you agree that government should assess the most relevant recommendations of the NICE6 guidelines and consider their implementation? Please provide reasons for your answer**

35. The NICE6 recommendations are as follows:

- Developing a strategy for people living in cold homes
- Identifying people at risk from cold homes
- Training practitioners to help people with cold homes
- Raising awareness of how to keep warm at home
- Ensuring buildings meet required standards

36. We welcome the commitment to the assessment and urge the commitment to implementing the NICE6 guidelines. Identifying those at risk from cold homes and supporting them to ensure they can achieve a greater level of comfort, especially as energy costs rise, would prevent unnecessary sickness and improve the wellbeing of people living in these homes. One of the major factors preventing the remediation of buildings to ensure they are fit for human habitation is the cost of works and the availability of skilled tradespeople to improve homes. We would welcome a strategy to ensure that those who are in cold homes and require the most support are given an opportunity to have their homes improved to ensure a greater standard of warmth.

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

37. We see no issues with the Department for Communities working with organisations that provide energy support to those who need it. A consistent approach has two key benefits. Firstly, it can help those who require emergency support contact these services. Secondly, it can ensure that resources are dedicated to those who need it most, based on a consistent criterion of when emergency support should be provided.

**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?**

38. We agree with proposals to prioritise Discretionary Support to focus on those who are most at risk in a future energy or cost of living crisis. However, this should not come at the expense of those living in the private rented sector, whose landlords may not qualify for emergency financial support. In a future energy or cost of living crisis, landlords will have fewer financial means to improve homes to a greater standard, which could leave private renters in cold and energy inefficient homes. To resolve this, in addition to any funding that is ringfenced for those experiencing fuel poverty, we would also urge the Department for Communities to consider funding to support landlords make necessary improvements to their homes in the private rented sector. This would help improve the energy efficiency of more homes and support vulnerable private tenants.

**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?**

39. We agree that the impact of the changes to Winter Fuel Payments should be assessed, particularly for those who would be unable to afford to heat their homes without the payments. Those who would be unable to heat their homes should receive additional financial support.

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

40. We agree that the impact of decisions on specific groups is worth exploring, however the best way of doing so is outside of Propertymark's expertise.

**Question 28: Do you have suggestions for how we could improve understanding and awareness of existing tools to enable consumers to manage their energy costs?**

41. This could potentially be part of the objectives of the proposed referral system, where those at risk of fuel poverty can be referred to the task force who can signpost existing tools. Other groups can be signposted through a well-funded awareness campaign including online and offline advertisements. This could also be used to raise awareness of any energy efficiency programmes and funding that is available.

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

42. As mentioned in our response to question 28, the referral taskforce could be tasked with also raising awareness of affordable tariffs.

**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.**

43. We agree that some populations would benefit less from energy efficiency measures. There are two main examples that should be considered. Firstly, residents of flats or other buildings where residents cannot make changes to their building without permission from a “superior landlord”. There is a limit to energy efficiency measures that these residents can make, without needing approval for building-wide expensive measures. Additionally, many low carbon heating systems that would be applicable for other housing, such as air-source heat pumps, cannot be installed in each individual flat, limiting the options for these residents. Secondly, residents in listed buildings where energy efficiency measures would be difficult to introduce without altering the nature of the property.

**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?**

44. We are unaware of any such research that is required.

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

45. We agree that a common quality assurance standard or framework should be introduced for all energy efficiency and low carbon heat grant schemes. We believe this for two reasons. Firstly, it would allow the Department for Communities to review the effectiveness of grant schemes, ensuring that they meet high standards. Secondly, it provides a level of trust in consumers that utilising the scheme will lead to energy efficiency improvements in their property, increasing the number of people who access grant schemes. This is especially important given the cost of energy efficiency improvements.

**Question 33: Do you agree that government should take a common approach to consumer protection across all supported energy efficiency schemes? Please provide reasons for your answer.**

46. As with our answer to question 32, we agree that consumer protection should be applied across all supported energy efficiency schemes. This will improve consumer confidence in the schemes and lead to more consumers accessing the schemes, which will improve more homes.

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

47. This is an area that is outside of PropertyMark's expertise, however we would suggest an aspirational term to describe being out of fuel poverty. This could help people approach support to reach "energy wellbeing" rather than escaping fuel poverty.

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

48. We support the movement towards using a range of indicators in measuring and understanding fuel poverty. As referenced in the consultation document, the use of "10% of income on all fuel use" does not take into account additional costs that would impact vulnerable private tenants or homeowners. We agree with the assessment that housing costs should be considered and taken away from income as a large family or individual with a high mortgage/rent payments could have a relatively high income before housing costs but still be in fuel poverty.

**Question 36: Are the indicators suggested the correct ones? Please provide reasons for your answer.**

49. The indicators suggested are as follows:

- Are you able to pay regular bills, including gas, electricity or oil, without cutting back on essentials?
- Household energy expenditure relative to all expenditure
- Is your home damp-free?
- People's awareness and confidence in being able to address their own energy issues

50. We would recommend avoiding an over-reliance on self-reporting from homeowners. Not only could this lead to false information being shared, but the indicators suggested can be interpreted in different ways. Additionally, many of the indicators do not allow for further information to be shared to allow for the degree in which homeowners are in fuel poverty. For example, responding "yes" to the question "is your home damp free" does not demonstrate the level of dampness, meaning a home with a small patch of damp in one room would be considered the same as property where damp is at dangerous levels. As an alternative, we would recommend enabling homeowners to demonstrate the degree to which their homes meet the indicators. Additionally,



we would recommend that the primary indicator be “Household energy expenditure relative to all expenditure” as that can provide a more objective level of fuel poverty that can be proven through a homeowner’s financial history.

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

51. We disagree with the introduction of an indicator based on energy confidence or awareness that is self-reported by the homeowner. Not only is this easy to provide false information but is difficult to quantify. An assessment of a consumer’s awareness and confidence of being able to address their own energy issues, should be based on how a consumer has already take steps (or not taken steps) to address their energy issues. This can provide a more accurate assessment of their confidence, as if they were confidence, they would be more likely to have addressed issues already.

**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.**

52. We agree with the proposal that carbon emissions are not used as a fuel poverty indicator. The ability to afford energy costs and the energy efficiency of properties are two separate issues.

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

53. This is outside of Propertymark’s area of expertise.

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

54. We have no further comments to make at this time.

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

55. We have no further comments to make at this time.