

Public Document Pack

**Democratic Services Section
Legal and Civic Services Department
Belfast City Council
City Hall
Belfast
BT1 5GS**

12th August, 2026

MEETING OF CLIMATE AND CITY RESILIENCE COMMITTEE

Dear Alderman/Councillor,

In addition to those matters previously notified to you, the following item will also be considered at the meeting to be held at 5.15 pm on Thursday, 13th August, 2026.

Yours faithfully,

JOHN WALSH

Chief Executive

AGENDA:

7. **BCC response to the DfC Consultation on Warm Healthy Homes Fund (WHHF) (Pages 1 - 22)**

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Subject:	Belfast City Council's response to the Department for Communities (DfC) Consultation on Warm Healthy Homes Fund (WHHF)
Date:	13 August 2026
Reporting Officer:	John Tully, Director of City and Organisational Strategy
Contact Officer:	Kevin Heaney, Head of Inclusive Growth & Anti-poverty Geoff Dickson, Strategic Planning and Policy Manager Madelene Armstrong, Policy and Performance Analyst

Is this report restricted?	Yes ☐ No ☒								
Please indicate the description, as listed in Schedule 6, of the exempt information by virtue of which the council has deemed this report restricted. Insert number 1. Information relating to any individual 2. Information likely to reveal the identity of an individual 3. Information relating to the financial or business affairs of any particular person (including the council holding that information) 4. Information in connection with any labour relations matter 5. Information in relation to which a claim to legal professional privilege could be maintained 6. Information showing that the council proposes to (a) to give a notice imposing restrictions on a person; or (b) to make an order or direction 7. Information on any action in relation to the prevention, investigation or prosecution of crime									
If Yes, when will the report become unrestricted? <table style="width: 100%; border: none;"> <tr> <td style="width: 70%;">After Committee Decision</td> <td style="width: 30%; text-align: center;">☐</td> </tr> <tr> <td>After Council Decision</td> <td style="text-align: center;">☐</td> </tr> <tr> <td>Sometime in the future</td> <td style="text-align: center;">☐</td> </tr> <tr> <td>Never</td> <td style="text-align: center;">☐</td> </tr> </table>		After Committee Decision	☐	After Council Decision	☐	Sometime in the future	☐	Never	☐
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Call-in	
Is the decision eligible for Call-in?	Yes ☒ No ☐

1.0	Purpose of Report
1.1	The purpose of this report is to present for Members consideration a draft council response to the DfC consultation on the Warm Healthy Homes Fund (WHHF).
2.0	Recommendations
2.1	Members are asked to: - consider and comment on the draft response to the specific questionnaire issued by DfC (attached at Appendix 1); - agree that the response, subject to any amendments suggested by Members, be submitted to DfC in line with the closing date of 19 August 2026 - note that the Council's response would be submitted on the basis that it would remain subject to full Council ratification on 1 September 2026 with any further comments submitted at this point.
3.0	Main Report
3.1	<u>Background</u> The Department for Communities is proposing a new Warm Healthy Homes Fund – an energy efficiency scheme to help low-income households experiencing or at risk of Fuel Poverty. The £150m Fund will act as the Department's principal, long-term sustainable solution to fuel poverty and will build on the success of the Department's current Affordable Warmth Scheme and lessons learned from similar schemes across the devolved nations.
3.2	Tackling fuel poverty in Northern Ireland will help protect people from the effects of living in a cold, damp home, and doing so sustainably will also make a positive contribution to Northern Ireland's carbon emissions reduction targets. The Department proposes to introduce a new model for the delivery of energy efficiency measures to low income households which not only builds on the success of the current Affordable Warmth Scheme but also takes lessons learned from this outgoing scheme.
3.3	The new Warm Healthy Homes Fund aims to be more ambitious in terms of delivery, offering a simple, streamlined approach with registered contractors, ensuring ease of access and energy advice for low-income households. It is proposed that the Warm Healthy Homes Fund will continue with a 'whole-house' approach, ensuring that measures are installed in a priority order that benefits the property most. The Warm Healthy Homes Fund will take a fabric-first approach, address ventilation and draught proofing, offer heating solutions where needed (including low-carbon heat where appropriate), and renewable technologies.
3.4	<u>Warm Healthy Homes Fund Summary</u> The consultation document sets out a high-level overview of the Department's proposed model for the delivery of energy efficiency measures to low-income households. It seeks feedback on proposed elements of the Warm Healthy Homes Fund. The proposals include: • Eligibility qualification criteria including income thresholds and the use of certain benefits to determine entitlement to the Warm Healthy Homes Fund • Impact of householder personal savings • Increased grant limits • Support offered to those living in the Private Rented Sector

	• Quality Standards and Redress
3.5	The objectives of the WHHF are set out as follows: • Improve energy efficiency by installing energy efficiency measures to enhance the energy well-being of occupants and reduce energy costs in fuel poor households living in the private sector. • Enhance energy security for low-income households by reducing dependence on fossil fuels and lowering carbon emissions. • Support a 'just transition' by supporting low-income households through the installation of energy efficiency measures to reduce carbon emissions in the residential sector.
3.6	The Warm Healthy Homes Fund will assist those low-income households who are experiencing or are at risk of fuel poverty. It will be available to owner-occupied households and provide some assistance to those in the Private Rented Sector. It is not available for NIHE, social housing or housing association tenants. The property must not be: • A holiday/second home • Bed and breakfast/short-term let • Commercial establishment.
3.7	<u>Draft Council Response</u> The draft response attached welcomes the proposed intent behind the fund, noting that its focus is to address a possible gap in supporting non NIHE social housing or housing association properties impacted by fuel poverty. Where appropriate, the Council response makes further recommendations which it is felt will further enhance the impact of the funding including, for example: • The need to ensure that any eligibility thresholds take account of in-work poverty and low-income homes. • Recommends that those officials/individuals who are appointed to undertake home assessments to inform decisions on allocation of the fund, should be adequately trained to support consistent, person-centred decisions. • Supports a proportionate approach to the treatment of savings in considering eligibility for funding. • Recommends that Energy Performance Certificates (EPCs) should not be used in isolation when determining eligibility and prioritisation for energy efficiency improvement measures. Whilst EPCs can provide a useful indication of a property's energy efficiency, they are based on standardised assumptions rather than actual building performance. The Council would support a broader assessment framework that complements EPCs with additional indicators, including actual energy consumption, carbon emissions and property-specific characteristics. • Recommends that given the small amount of total funding available, that grants are directed towards measures to improve the fabric of the home rather than more costly solar PV and battery systems. • In relation to the private rented sector, the Council would recommend that tenant protections must accompany landlord support: safeguards against unjustified rent increases or eviction following publicly funded upgrades are essential, so that the benefit accrues to the tenant

3.8	whom the Fund is designed to help. A defined post-works protected period should be considered. - The draft response also highlights the need for close working relationships with local government to ensure that we are meeting need in terms of those areas where there is a known concentration of households at risk or experiencing fuel poverty. Integration with the work of the Retrofit Hub and delivering Belfast's net zero targets - Responsibility for development of the Fund lies with DfC which regularly contributes to the Belfast Retrofit Hub as an active steering group member. The Council-convened Hub ran a series of workshops in November 2022, teasing out the conditions required for low carbon retrofit to be rolled out across the city with particular emphasis on homes. Many of the issues raised and recommendations made are addressed in this replacement of the Affordable Warmth Fund, including streamlining the application process, providing greater quality assurance, increasing the size of the fund and greater support for private rental sector stock. The Fund approach of prioritising 'worst first' and 'fabric first' along with moving towards incorporating the use of the PAS2035 standard, reflects the recommendations of the Hub and the Council. - The fund is likely to have a positive but limited effect on delivering the City's net zero targets due to the small amount of funding available (£150m over the first five years for the whole region). The energy modelling undertaken through Belfast Local Area Energy Plan estimates that a £2.5bn capital investment into domestic properties will be required by 2050 with 108,000 properties in Belfast requiring fabric upgrades. Even if the entire £150m was allocated to Belfast, this would only equate to £1390 per home and less than 1% of the investment required. The fund could, however, help to create a pipeline of households, contractors and delivery partners for a larger scale future retrofit programme and also build an evidence base on costs, household participation and delivery models. - In the meantime, a parallel programme of work is needed to scale retrofit in the larger 'able to pay' segment of the market alongside progressing the other LAEP priority projects such as the district heat in order to achieve the City's net zero ambitions.
4.0	Financial & Resource Implications
	None.
5.0	Equality or Good Relations Implications / Rural Needs Assessment
	None.
6.0	Appendices
	Appendix 1: DfE Consultation on Warm Healthy Homes Fund



**Warm Healthy
Homes**



Department for
Communities

www.communities-ni.gov.uk

Warm Healthy Homes Fund

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

[Email Response Form](#)

Warm Healthy Homes Fund Consultation

Enquiries to:

Home Energy Branch

Department for Communities

Causeway Exchange

1-7 Bedford Street

Belfast

Antrim

BT2 7EG

Email: HEB@communities-ni.gov.uk

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

How to Respond

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

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

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

Warm Healthy Homes Fund Consultation

Department for Communities

Climate Change Division

4th Floor, Causeway Exchange

1-7 Bedford Street

Belfast, BT2 7EG

Antrim

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

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

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

General Information

Name: Madelene Armstrong

Email Address: policy@BelfastCity.gov.uk

What best describes your interest in this consultation

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

Please indicate if you are replying as:

1. An individual / Member of the Public
2. On behalf of a body or organisation (please specify who you represent below):
Belfast City Council

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.

In responding, Belfast City Council (the Council) would ask that consideration be given to:

- Targeting assistance at households in receipt of the Universal Credit Personal Allowance and Pension Credit, alongside an income threshold, is consistent with the Warm Healthy Homes 2026–2036 Fuel Poverty Strategy principle of helping the worst first and directs finite resources toward those least able to afford a warm, healthy home.
- With approx. 41% of Belfast working residents working in jobs that tend to be characterised by low pay; combined with a high proportion of households in the private rented sector (just over 20% in Belfast) alongside high rental affordability issues, there is potential to significantly impact those experiencing or at risk of fuel poverty in the city.
- BCC particularly welcomes the decision to set the income threshold at the level of the National Living Wage and to adjust it annually - a key weakness of the previous Affordable Warmth Scheme, which relied on a £23,000 gross income figure that no longer reflected rising living costs.

The Council also welcomes the exclusion of certain disability and health-related benefits, including the Winter Fuel Payment, from the income assessment. We welcome recognition that those in receipt of disability and health-related benefits often face higher energy costs.

Belfast City Council offers the following observations to strengthen the approach:

- The Council recognises that fuel poverty is driven by more than gross income with household composition, health, and the energy efficiency of the dwelling all shaping affordability. BCC would encourage the Department to assess disposable income (after housing costs) where practicable, and to complement the income test with a vulnerability matrix, such as that used under the Northern Ireland Sustainable Energy Programme (NISEP), so that support reaches those in greatest need
- Many fuel-poor households are not in receipt of means-tested benefits, either because they narrowly exceed thresholds or have not claimed. The income-threshold route is therefore essential to reaching these households, and should be retained and actively promoted, for example through the health service, local councils as front-line service providers and others providing a one stop shop service
- The Council would welcome clarity on how the three-consecutive-period qualifying condition for the Universal Credit Personal Allowance will operate in practice, to ensure it does not inadvertently exclude households whose circumstances fluctuate.
- The Council recommends that those carrying out home assessments receive fuel poverty training, to support consistent, person-centred decisions.
- The Council would advocate for ongoing close working relationships with local government to ensure that we are meeting need in terms of those areas where there is a known concentration of households at risk or experiencing fuel poverty, such as sharing the learning from the Warm and Well partnership between the Council and PHA with local data analysis identifying 'hot-spots' as well as the ongoing engagement with Building Control to ensure the roll-out of the fund is adequately supported.

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.

In responding, Belfast City Council would ask that consideration be given to:

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

Proposal: Prioritisation of applications

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

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

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

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

Question 3

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

- ☐ Yes
☒ No

Please give reasons for your answer limited to 500 words.

In responding, Belfast City Council would ask that consideration be given to:

- Recommend that Energy Performance Certificates (EPCs) should not be used in isolation when determining eligibility and prioritisation for energy efficiency improvement measures in Northern Ireland.
- While EPCs can provide a useful indication of a property's energy efficiency, they are based on standardised assumptions rather than actual building performance and are influenced more by energy costs than carbon emissions. This can result in lower-cost fossil fuels, such as gas, appearing more favourable than lower-carbon technologies and does not adequately reflect the ongoing decarbonisation of the electricity grid.
- The Council supports a broader assessment framework that complements EPCs with additional indicators, including actual energy consumption, carbon emissions and property-specific characteristics. This would help ensure that public investment is directed towards homes where improvements will deliver the greatest reductions in energy demand, household energy bills and carbon emissions.
- The energy efficiency of a property should remain a central consideration in prioritisation, and BCC supports targeting the least efficient homes first. Households living in these properties are often at greatest risk of severe fuel poverty, and a fabric-first, worst-first approach is likely to provide the greatest overall benefits. However, EPC ratings should not be the sole determinant of priority.
- EPC assessments must be up to date to be reliable, and their reliance on modelled fuel-cost assumptions can lead to unintended outcomes, particularly during periods of energy-price volatility. In some cases, efficient low-carbon heating systems may negatively affect EPC ratings because electricity costs remain higher than gas costs. Previous experience from the ECO scheme in Great Britain also highlighted cases where fuel-poor households were unable to access support because their EPC rating was considered sufficient or improvement measures were deemed uneconomic.
- The Council supports wider reforms to the EPC framework, including improved survey accuracy, the use of broader building-performance metrics, incorporation of real-world energy data, and greater transparency through confidence ratings. Over time, EPCs should evolve into a more comprehensive building-performance assessment tool.
- The WHHF should also take account of household vulnerability and need. A vulnerability matrix incorporating factors such as age, disability, health conditions and household composition would help ensure that households experiencing acute hardship are not overlooked due to modelled EPC outcomes alone.

- In line with just transition principles, prioritisation should be rural-proofed. Rural households in Northern Ireland face a higher risk of fuel poverty because of their reliance on home heating oil, higher installation costs and reduced access to energy-efficiency services. Without targeted support, these households are more likely to remain in cold and energy-inefficient homes.
- Finally, the Council would welcome assurances that a first-come, first-served approach to home assessments will not disadvantage digitally excluded households or those less able to navigate the application process. Proactive outreach supported referral pathways, and one-stop-shop services will be essential to ensuring equitable access to support for those most in need.

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

Please provide detail limited to 500 words.

- The Council would suggest that consideration be given to supplementing EPC ratings with additional metrics when prioritising retrofit programmes. Consideration could be given to factors such as actual energy consumption, carbon emissions and building fabric performance. Therefore, a whole-house assessment to allow an improved targeted approach.

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

In responding, Belfast City Council would ask that consideration be given to:

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

- Council regularly encounter properties in the privately rented sector with the occupants who likely experience fuel poverty resulting in dampness due to inadequate heating and insulation.
- The Council notes that to help the poorest performing properties in the private rented sector, the Department has considered ways in which support may be offered to the sector, considering the intention to introduce minimum energy efficiency standards for rental properties.
- The Private Tenancies Act (NI) 2022 will allow for the introduction of energy efficiency regulations which will require landlords to address these issues in a legislative framework, therefore financial assistance for landlords to meet any new prescribed standards will be important to support and assist compliance. It is noted that the private rented sector would have a large proportion of the older, energy inefficient “hard to treat” properties and the Council is supportive of any intervention that can be introduced to improve the overall standard of private rented sector accommodation ensuring warmer and comfortable living standards for all tenants.
- Council has advocated on previous occasions for a review to the statutory fitness standard which would have encompassed some of these matters. We therefore await the Department’s proposals to introduce a new standard which has been in the planning stage for a considerable period of time. The current Fitness standard dates from 1981 and is considered outdated.
- The Council would outline the following additional recommendations to safeguard tenants and public value:
 - Tenant protections must accompany landlord support: safeguards against unjustified rent increases or eviction following publicly funded upgrades are essential, so that the benefit accrues to the tenant whom the Fund is designed to help. A defined post-works protected period should be considered.
 - Publicly funded improvements to a private asset should, over time, be linked to Minimum Energy Efficiency Standards in the PRS, so that grant support and regulation work together rather than public money substituting for landlord responsibility.

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

Do you agree with this addition?

☐

☒ No

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

The Council notes the relatively small amount of funding available and large number of homes requiring energy efficiency upgrades. The energy modelling undertaken through Belfast Local Area Energy Plan estimates that a £2.5bn capital investment into domestic properties will be required by 2050 with 108,000 properties in Belfast requiring fabric upgrades. Even if the entire £150m was allocated to Belfast, this would only equate to £1390 per home and less than 1% of the investment required. The fund could, however, help to create a pipeline of households, contractors and delivery partners for a larger scale future retrofit programme and also build an evidence base on costs, household participation and delivery models. The Council suggest that funds should target more shallow, affordable retrofit measures focused on the fabric of homes rather than more expensive renewable energy and energy storage systems.

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.

- In responding, Belfast City Council would ask that consideration be given to the limited amount of funding available (£30m pa) and how such funding can have greatest impact on improving the fabric of the home (e.g. insulation, draft proofing etc) in order to reach more homes in need.

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.

In responding, Belfast City Council would ask that consideration be given to:

- Whilst the Council recognises the value of a whole-house approach, it also recognises that these risks limiting the number of properties improved and therefore advocates a sequential approach. The Council recognises the safeguards required to protect the fund from misuse such as limiting the number of applications, however, it would ask the Department to build in a degree of flexibility so that a strict once-only rule does not disadvantage households where a series of interventions are required over time. . In practice, funding constraints may mean a whole-house solution is delivered in phased steps. Works may need to pause, for example, where a property requires remedial works beyond the £500 allowance (such as addressing damp or a structural defect that must be resolved before insulation or a heat pump can be installed safely), or where the household experiences a change in circumstances such as a bereavement or hospital admission. Where a household has received only partial treatment, it should not be permanently excluded from returning for the remaining measures.
- Provision should similarly be made where a household's circumstances change materially, where an earlier measure fails or requires remediation, or where new technologies become available that were not part of the original assessment. Clarification is required on how this "once only" rule might apply to tenants in the PRS sector. We would advocate that the rule applies only to successful applications. Clear guidance on how such exceptional cases will be handled would provide reassurance to applicants and reflect the Strategy's commitment to responding to changing needs.

Proposal: Quality Standards

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

Question 7

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

Do you agree with this proposal?

- ☒ Yes
☐ No

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

In responding, Belfast City Council would ask that consideration be given to:

- In relation to post-installation quality checks, it should be noted that Building Control's role is to enforce the Building Regulations, with responsibility for compliance resting with those carrying out the works.
- Building Control inspections and completion certificates should not be regarded as a sign-off of the quality of the works. A completion certificate indicates that the Council is satisfied that the works appear to comply with the Building Regulations, but it is not conclusive proof of compliance nor a measure of quality. As the Building Regulations set minimum statutory standards, any post-installation quality check process should be separate from the Building Control process.
- The Council supports providing households with a list of registered, accredited contractors to deliver the works identified by the home assessment. Robust consumer protection and support are fundamental to building the householder trust and confidence needed for uptake; learning from UK retrofit programmes has shown that householders are often sceptical of works offered at no cost, and a managed list of vetted contractors, combined with measure-specific accreditation, provides assurance on quality, technical competence and consumer protection while offering households a streamlined, accessible service. To ensure the approach works well for vulnerable households, the Council would recommend:
 - A clear, simple and independent redress mechanism sits behind the contractor list, so households know where to turn if problems arise
 - Adequate geographic coverage is secured, including in rural areas, to avoid delays or gaps in provision that could amount to a postcode lottery
 - The Managing Agent provides supported choice for households who may find it difficult to select or liaise with a contractor unaided
 - Funding to support skills development will be essential to ensure a sufficient pool of accredited installers for low-carbon technologies.

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

- Gas Safe (**must** be gas safe registered to install gas appliances)

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

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

Question 8

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

- ☐ Yes
- ☒ No

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

In responding, Belfast City Council would ask that consideration be given to:

- The Council supports the ambition of aligning the Fund with recognised quality standards such as PAS 2030 and PAS 2035, which is the right long-term direction of travel.
- Feedback from the Belfast Retrofit Hub indicates that industry in Northern Ireland is not currently ready to move fully to PAS 2030/2035 without a planned, supported transition, and has answered 'No' to reflect a realistic assessment of current capacity rather than any disagreement with the principle. Adopting PAS 2035 requires specific roles, such as Retrofit Coordinators, Assessors and Designers, and a depth of accredited capacity that is still developing locally. Evidence from the roll-out of these standards in Great Britain and ROI shows that moving too quickly, without sufficient trained personnel, risks bottlenecks, delays and increased costs, which would slow delivery to the very households the Fund is intended to help.
- An accredited quality standard management tool, such as PAS2035, ensures consistent delivery to an agreed standard, however the tool must suit the scale of a project or programme. A standard is more likely to be adopted and adhered to by

specialist contractors if they can focus on relevant modules. Specific work is needed to understand existing quality control processes and any gaps.

- PAS2035 contains individual elements that have value as good practice and as focus points for training. There has been limited appetite to date from the construction industry due to the resource commitment involved with little or no guarantee of relevant future work to justify the investment. With costs per property ranging from £900-£2K and relatively low house prices in NI compared with GB, PAS2035 can be prohibitively expensive across all tenures, especially on restricted or single measure retrofit interventions.
- The Council therefore recommends a phased transition, supported by investment in training, skills and workforce development, with a clear timeline and interim accreditation requirements. A common quality assurance framework across all government energy efficiency and low-carbon heat schemes would provide consistency and help the sector build capacity efficiently. With the right support and lead-in time, BCC believes industry can move to these principles; the priority is to sequence the transition so that it raises standards without disrupting delivery to fuel-poor households.
- Given the potential demand for the fund, this is likely to place a significant demand on registered and approved contractors therefore it may be beneficial to engage early with skills providers and Local Labour Market Partnerships in order to ensure there are sufficient skilled and approved contractors available to ensure the construction sector is in a position to deliver on the scheme and meet the need. [source: here]

Question 9

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

☒ Yes

☐ No

Please provide detail limited to 500 words.

In responding, Belfast City Council would ask that consideration be given to:

- Building on lessons from government funded retrofit schemes in GB, insurance backed guarantee systems (such as Trust Mark) are critical to protect householders in the event of quality issues, particularly in the event of a delivery company ceasing to exist.
- The Council considers the proposed accreditations to be broadly appropriate and comprehensive.
- The consultation describes the Microgeneration Certification Scheme (MCS) as covering small-scale renewable energy systems; BCC would note that MCS in fact certifies both small-scale renewable generation and low-carbon heat technologies, including air source heat pumps, and this should be made explicit given that the Fund supports heat pump installation. TrustMark, as the government-endorsed quality mark underpinning PAS 2030/2035 delivery in Great Britain, is also worth aligning with as the Fund matures.

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

Proposal: Aftercare

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

Question 10

Do you think that the proposed aftercare arrangements are sufficient?

- ☐ Yes
☒ No

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

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

- Aftercare should place strong emphasis on education and advice at the point of, and following, installation – helping households understand how to operate new systems (particularly heat pumps and renewable technologies, which behave very differently from traditional heating) so that they realise the expected savings and comfort. Evidence consistently shows that the benefits of low-carbon heating and renewables depend heavily on households understanding how to use them. To this end, we would argue that all participating households receive one mandatory in-person visit following installation to ensure the householder understands how to operate the new systems.
- A single telephone contact may not suit everyone; provision should be made for those who are digitally excluded, have communication or accessibility needs, or would benefit from an in-person visit as the default rather than the exception.
- A longer-term check, for example a further follow-up after the first heating season, since issues with comfort, running costs or performance may only become apparent over a full winter.

- Aftercare should include clear signposting to wider energy advice, income-maximisation and tariff support, and to independent redress where a household is dissatisfied with the works.
- The proposals for tailored aftercare and redress are vital elements of the fund's success and must be viewed as integral to the scheme's delivery and long-term success, therefore will need to be resourced to ensure effectiveness.

Equality Considerations

Question 11

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

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

Belfast City Council would highlight the following specific areas for consideration:

- Age and disability: the disregard of disability and health-related benefits and the more generous savings treatment for older applicants are positive and should be retained, recognising higher energy needs.
- Rural equality: rural households in Northern Ireland are at heightened risk of fuel poverty, driven principally by very high reliance on home heating oil – an unregulated fuel with no price-cap protection – compounded by typically higher installation and access costs. Oil remains the primary heating method for the majority of households in Northern Ireland (source: NISRA Continuous Household Survey Heat and Insulation Results, 2024/25), with reliance considerably higher in rural areas where the gas network does not reach. BCC welcomes the enhanced grant limit for hard-to-treat homes and urges that the scheme be rural-proofed so that location does not determine access.
- Accessibility of the process: reliance on a first-come, first-served, and potentially digital, application route could disadvantage those who are digitally excluded, have literacy or language needs, or find bureaucratic processes a barrier. Proactive outreach, trusted referral pathways and support with applications will be important, ideally delivered with the support of community embedded one stop shops.
- Tenure: PRS tenants have historically been under-served and have limited agency over their homes' efficiency. Their inclusion is welcome and must be matched by protections against rent increases or eviction following publicly funded works, alongside a paired regulatory mechanism that encourages landlords to participate.
- Monitoring: BCC recommends that equality monitoring data be collected across the life of the Fund so that any disparities in access or outcomes between groups can be identified and addressed, and that people with lived experience of fuel poverty are engaged in the ongoing design and review of the scheme. This would support delivery that is fair, inclusive and consistent with a just transition.

- Equality considerations – the need to ensure that awareness and accessibility of the Fund for all S75 groups, particularly those most at risk or in fuel poverty – ethnic minority groups, lone parent/carers of young children, those with disabilities and older people. This should also be factored into the managing agent’s responsibilities during the delivery process, from application to aftercare and redress.

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