



Subject:	Belfast City Council's response to the Department for Communities (DfC) Consultation on Warm Healthy Homes Fund (WHHF)
Date:	13 August 2026
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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?	
After Committee Decision	☐
After Council Decision	☐
Sometime in the future	☐
Never	☐

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