



Action for Warm Homes
Northern Ireland

National Energy Action (NEA) Northern Ireland response to the Northern Ireland Executive Programme for Government Draft Outcomes Framework Consultation Document

March 2021

About National Energy Action (NEA)

NEA¹ is the national fuel poverty charity working to secure affordable warmth for disadvantaged energy consumers. NEA's strategic aims include influencing and increasing strategic action against fuel poverty; developing and progressing solutions to improve access to energy efficiency products, advice and fuel poverty related services in UK households and enhancing knowledge and understanding of energy efficiency and fuel poverty.

NEA seeks to meet these aims through a wide range of activities including policy analysis and development to inform our campaigning work, rational and constructive dialogue with decision-makers including regulatory and consumer protection bodies, relevant Government Departments, the energy industry, local and national government and we develop practical initiatives to test and demonstrate the type of energy efficiency programmes required to deliver affordable warmth.

NEA NI is primarily concerned with energy policy whilst maintaining a watching brief on social justice policies including income inequalities and levels of poverty in Northern Ireland.

Protecting vulnerable customers is our key aim so we work both reactively and proactively to ensure policy makers and regulators recognise the needs of the vulnerable in its widest sense. With tighter household budgets it is more important than ever that consumers are getting the best deal. Paying for domestic energy makes up a substantial portion of total household expenditure, so it is of specific concern to us but is often relegated in the ever-busy policy environment.

We are also chair of the Fuel Poverty Coalition and members of the Cliff Edge Coalition.

Our Response to the Programme for Government Draft Outcomes Framework

Urgent action is needed to improve health outcomes and support the most vulnerable people who are at most risk of needless death and morbidity². Public Health England (PHE) recently warned there is a clear

¹ For more information visit: www.nea.org.uk.

² The main causes of excess winter deaths are attributable to respiratory and cardio-vascular diseases which are badly exacerbated by cold conditions. Other causes may include influenza, trips and falls or in a small number of cases, hyperthermia. Public Health England cites studies that 10% of excess winter deaths are directly attributable to fuel poverty and that a fifth of EWDs are attributable to the coldest quarter of homes. This was regarded as a 'conservative' estimate as separately the World Health Organisation stated that 30% is the best estimated share – based

overlap between cold homes and COVID-19³ and it is more important than ever that the most vulnerable members of society can afford to live in a warm, safe home.

While we agree with the 9 main outcomes, we believe that there should be a specific outcome that addresses affordable warmth and energy efficient safe homes. This should also include a specific objective to address the scandalous rates of Excess Winter Deaths (EWD) in NI. Our most recent figures 2017-18, show an increase of 130% since 2015-16. The total number of EWD for 2017-18 were 1,500. This will undoubtedly have increased due to COVID-19.

The fuel poverty strategy is mentioned twice, yet this strategy is extremely out of date and requires immediate attention. The Draft Programme for Government (PfG) 2016-2021 pledged a new strategy which we are still awaiting. NEA NI is calling on the Northern Ireland Executive to tackle comprehensively fuel poverty in the PfG by making a commitment to the following:

- Develop a detailed and costed action-plan setting out how and when fuel poverty will be eradicated in Northern Ireland; and
- Provide continued support to households in severe fuel poverty to stay warm until fuel poverty is eradicated.

The energy strategy is also referred to in the PfG and this too will be vital for Northern Ireland to reach net zero and should be closely aligned to a new fuel poverty strategy, and ensure that the consumer is placed upfront and central to the new energy strategy, with appropriate protections for low income and vulnerable households.

It is also disappointing to note that while clearly a strategic document, this PfG lacks the necessary objectives, indicators and measurements to make any more meaningful comments on the framework.

Strategic case: Delivering on energy efficiency

Why action on warm homes matter

- Living in cold, damp and unhealthy homes causes unnecessary hardship and premature mortality.
- 2017-18 Excess Winter Deaths (EWDs) show an increase of 130% since 2015-16. The total number of excess winter deaths for 2017-18 were 1,500⁴.

on European evidence – of EWDs that can be considered attributable to cold housing conditions. This suggests that poor energy performance – manifested in homes that are hard and/or expensive to heat, thereby exacerbating the risks of respiratory and circulatory problems and poor mental health – is a significant contributory factor to the number of EWDs in the UK.

³ Within the document they highlight why tackling cold homes should be a priority to protect older people, people with pre-existing chronic medical conditions such as cardiovascular and respiratory conditions, in particular chronic obstructive pulmonary disease (COPD) and asthma, and diabetes, people assessed as being at risk of or having had recurrent falls, people who are living in households experiencing fuel poverty and people experiencing homelessness or rough sleeping. The document goes on to add that many of these groups are also at greater risk of severe illness from COVID-19. See: <https://www.gov.uk/government/publications/health-matters-cold-weather-and-covid-19/health-matters-cold-weather-and-covid-19>.

⁴ Statistics released by the Northern Ireland Statistics and Research Agency (NISRA).

- Thousands of people face every winter in properties which are dangerous or unfit for colder seasons and 22% in Northern Ireland still live in fuel poverty, meaning they live below the poverty line but also have much higher bills due to poor levels of energy efficiency⁵.
- In a recent report⁶, NEA found that COVID-19 had created difficult conditions for fuel poor households, driven by an increase in energy use, due to more people spending more time at home, and a reduction in income, as many jobs were either lost or placed on furlough.
- The same research⁷ found that three quarters of frontline organisations say there was a high risk of the increased building up of fuel debt this winter, as a direct result of the pandemic.
- Independent analysis suggests that, during winter months, families in cold, leaky homes are facing heating bills on average of £124 per month, compared with £76 per month for those in well-insulated homes (£50 per month⁸).

Increasing public investment on energy efficiency can also:

- **Reduce the burden on the health system and increase the quality of service in the NHS.**
- **Strengthen the economic recovery**, supporting long term jobs. According to the Department for Business, Energy & Industrial Strategy (BEIS), the Green Homes Grant (GHG) in England will support 100,000 jobs in green construction⁹. Additional funding for fuel poor households to upgrade their homes could help support these jobs well into the 2020s. The skills required for these jobs will equip the workforce for further progression towards net zero, as more homes look to increase their energy efficiency.
- **Improve economic circumstances across UK.** The need for energy efficiency upgrades is well spread out across the UK. Public money spent on energy efficiency in this way means money saved for householders. This saving means more spending power, which often means greater spending in local areas, helping to 'level up' local economies. As fuel poor homes are often found in areas that have suffered detriment, this has the effect of increasing economic activity in those areas that need it most.
- **Strengthen research, innovation (in the form of technological, financial and regulatory innovation) and manufacturing bases**, all of which will be needed for a successful national rollout of energy efficiency upgrades.

⁵ Northern Ireland House Condition Survey: <https://www.nihe.gov.uk/Documents/Research/HCS-2016-Main-Reports/HCS-Main-Report-2016.aspx>.

⁶ The 2019-20 Fuel Poverty Monitor found that vulnerable energy consumers had been particularly impacted in 5 ways due to COVID-19. (1). An increase in energy use, due to more people spending more time at home. (2). A reduction in income, as many jobs were either lost or placed on furlough. (3). Increased affordability issues and therefore debt, leading to energy rationing. (4). Reductions in smart meter/ECO installs. (5). Difficulties in accessing support, especially where households were digitally excluded or spoke English as an additional language. For the full report, please visit: <https://www.nea.org.uk/wp-content/uploads/2020/09/UK-FPM-2019.pdf>.

⁷ The 2019-20 Fuel Poverty Monitor found that Energy rationing can be deadly during cold winters and 95% of respondents to its Call for Evidence (CfE) said there was a moderate or high risk of more households cutting back on their energy use due to being forced to spend more time at home during lockdown. Three quarters of respondents said they were concerned that there is a high risk of the increased building up of fuel debt this winter, as a direct result of the pandemic. For the full report, please visit: <https://www.nea.org.uk/wp-content/uploads/2020/09/UK-FPM-2019.pdf>.

⁸ Lockdown in Leaky Homes, The Energy and Climate Intelligence Unit, 22 May 2020.

⁹ <https://www.gov.uk/government/news/homeowners-to-see-savings-available-under-new-green-homes-grant-scheme#:~:text=Announced%20in%20August%2C%20the%20Green,100%2C000%20jobs%20in%20green%20construction.>

Conclusions

This PfG needs a specific outcome around affordable, energy efficient and safe homes. This will require expediting the fuel poverty strategy which was pledged back in 2016.

NEA NI would welcome meeting with Officials or Ministers in the coming weeks to ensure these priorities are reflected in the PfG.

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