



Action for Warm Homes

Northern Ireland

**National Energy Action NI
response to the North West
Regional Energy Strategy
Consultation**

June 2020



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About NEA

NEA 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 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.

Fuel Poverty in Northern Ireland

Based on the 2016 House Condition Survey (HCS), Northern Ireland has a rate of fuel poverty at 22%. It is also estimated that there are approximately 43,800 households in extreme fuel poverty which means they need to spend over 15% of their total income to heat their homes. Additionally, one in five households in Northern Ireland are living in relative poverty and 19% of working age adults in the private rented sector spend more than a third of their income on housing .

Poor housing standards are responsible for the impaired physical and psychological health of millions of UK households. The links between low indoor temperature and poor health have been well understood for many years. Cold homes increase the likelihood, repetition and the severity of respiratory and cardiovascular illnesses hence leading to increased excess winter death rates. Between August 2017 — July 2018 there were 1,500 excess winter deaths in Northern Ireland. According to the World Health Organisation (WHO), a third of these deaths are directly attributable to living in cold damp homes.

The links between dampness and mould growth on asthma and allergies are also well known and understood as well as the impact that a cold home has on poor mental health, low self-esteem, educational performance and social isolation.



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Additionally, and unique to Northern Ireland, 68% of all households are reliant on home heating oil, a non-regulated fuel.

Improved insulation and heating standards are seen as the most rational and sustainable means of mitigating heating price increases and ensuring affordable warmth. While we must decarbonise our energy system, we must also ensure that the needs of those on lower incomes and experiencing fuel poverty should be protected.

We commend both Councils for designing and developing this strategy and have also made some comments to the questions posed as outlined below.

Draft Questions:

1. Do you agree with our approach to a joint council regional strategy?

Yes, we believe that the strategy is clear with a roadmap set to decarbonise. The strategy also outlines the local demands, challenges and opportunities looking at a whole energy system, which we believe to be a sound principle.

2. Do you agree that we have covered the 5 main themes in our roadmap toward net zero carbon? Are there any additional themes that we need to cover?

Yes, we agree with the five main themes. The importance of energy efficiency as a key tool to driving down costs for household is also one of the main drivers to tackle fuel poverty, and NEA and the Fuel Poverty Coalition (FPC) are calling on government to make energy efficiency an infrastructure priority and to set a Northern Ireland wide energy efficiency target in the new and emerging energy strategy.

3. Do you agree that we have covered the 9 main areas of work, as set out within our Flowchart of Smart Energy System work streams? Are there any additional areas that we need to cover?

We note that the document highlights fuel poverty, deprivation and social exclusion and we believe that due regard should be given to these issues when developing any financial models to protect low income and vulnerable individuals and families. We would like to ensure that these issues are embedded into the work streams identified.

4. Do you agree that the Regional Energy Strategy should be delivered by an independent body with representation from local government/public sector and industry/commerce? If so, do you consider Council's approach for a North West Regional Energy Hub solution? If you do not agree, what type of delivery mechanism would you suggest?

This would seem to be a sensible approach.



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- 5. Do you agree with approach to initially seek funding from the UK Government and the Government of Ireland to kick start the delivery of the Regional Energy strategy, with a view to self-funding longer term?**

Yes, this work will need strong commitment from Government with protections and safety mechanisms for lower income households. There needs to be a fair distribution of costs for those individuals reaping benefits of programmes.

- 6. Do you consider 2045 as a reasonable target to achieve a net zero carbon city region? If you do not what do you believe the target year should be and give a brief explanation for your answer.**

25 years to deliver is an ambitious target but ambition is required to progress the actions.

- 7. What are the opportunities for the rural and urban communities in the North West City Region to contribute to the successful implementation of the regional Energy Strategy?**

In order to get community buy-in, there needs to be clear and concise messaging and understanding of the key issues. Councils will need to ensure an effective communication strategy.

- 8. What skills and qualifications will be required by the local community to deliver the successful delivery of the Regional Energy strategy? Who should deliver these training courses and qualifications locally?**

It is vital that there are quality standards embed for the successful delivery of the strategy. Given that a technical survey encompasses the whole house energy efficiency needs, our recommendation would be assurance that technical surveyors are equipped with the necessary competence and accreditation to assess the whole dwelling. Learning from experience and refining schemes must form an integral part of the Councils role. This function needs to be clearly thought out and expertise involved in the design of same. Poor insulation in homes can be a public health risk and worse than no insulation.

- 9. What are the challenges and opportunities in the delivery of the Regional Energy Strategy?**

The cost of the challenge, the need for behaviour change, the size and scale of the job to be done. A clear communication strategy and a robust governance structure should be put in place.



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- 10. Do you believe there should be a selection criterion to identify which projects or initiatives should be introduced first? If you, what do you believe the selection criteria should be based upon?**

Poorly heating homes, as outlined above has serious consequences to health and well-being. We therefore recommend that you target the worst homes first in relation to energy efficiency and support for alternatives for households reliant on domestic home heating oil.

- 11. What role do you think the Regional Energy Strategy has in shaping the central government's energy policy? Do you think this approach will be different in NI Executive and the Government of Ireland?**

As outlined in the document, the strategy can respond to local strengths and local demands, challenges and opportunities.

- 12. Do you believe the Regional Energy Strategy should be linked to other initiatives in the region such as Climate Adaptation, Environmental Issues, Waste Reduction? If so, give a brief explanation for your answer.**

Yes, it will be important to ensure the strategy is dovetailing with other strategies and working alongside other regional schemes and initiatives to maximise impact.

- 13. Are there any other issues you would like to raise regarding the Regional Energy Strategy?**

N/A.

Response submitted by:

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