

RURAL LENS REVIEW



Sustainable Warmth

Protecting vulnerable
households



Published March 2021

INTRODUCTION

The Sustainable Warmth Policy Paper was published by the Department for Business, Energy and Industrial Strategy (BEIS) on 11 February 2021.

'Rural' is briefly mentioned just 3 times in the document in the following contexts:

- Defra's responsibilities include air quality and rural issues
- Around 500,000 fuel poor households live in rural areas
- The Rural Community Energy Fund

Whilst the paper does provide some clarity about who policies are intended to help, there does not appear to be any attempt to assess the effectiveness of current measures to address fuel poverty in rural areas nor to consider any possible rural: urban differences in the implementation or effectiveness of future policy measures. Possibly this is due to the strategic level of the paper. However, this lack of detail poses questions about **whether the proposed measures might disadvantage fuel poor families in rural areas who may be harder, or more expensive, to reach and whether there will be appropriately thorough rural proofing and monitoring of individual future policy measures to address fuel poverty.**

RSN will be closely monitoring any detailed policy changes as and when they are published and will make representations where appropriate.

For now, we set out what we think, on first examination, are the key messages from this Policy Paper together with some comments from an RSN perspective.

Key areas in the SUSTAINABLE WARMTH POLICY PAPER and Rural Services Network comments

Sustainable Warmth statements (using the Government's headings and words <i>except wording in italics</i>)		RSN initial comments
<p>Key topics covered by the White Paper and its rationale</p>	<p>Ministerial foreword Executive summary Chapter 1: Who are we trying to help Chapter 2: The fuel poverty target for England Chapter 3: Interim milestones Chapter 4: Our strategic approach to meeting fuel poverty</p> <p><i>The Ministerial Foreword and Executive Summary to this policy paper contain the following overarching themes:</i></p> <p>This strategy sets out our plan to ensure everyone can afford the energy required to keep their lights and heating on, especially during the winter. Coronavirus has resulted in many consumers seeing reduced income and therefore an increased number of households may now be struggling with their energy bills, especially as it gets colder.</p> <p>Ensuring everyone has a warm home is one step toward reducing health inequalities and reducing the burden on the NHS over the winter. Finally, this plan will contribute to reduced carbon emissions...Instead of investing in fossil fuels, we are benefiting consumers with clean technologies which reduce demand and will enable our transition to Net Zero.</p> <p>A household is in fuel poverty if they are on a lower income and unable to heat their home for a reasonable cost. This Government is committed to ensuring these households have access to sustainable, low-carbon warmth as we transition to Net Zero. This Fuel Poverty Strategy for England sets out our plan to:</p>	<p>The broad strategic direction of the Policy Paper is helpful, but it does not set out to design detailed schemes for the whole of the period to 2030. It acknowledges that interim milestones and a long-term target are important factors in decision-making but the strategic level of the paper gives few insights into the how future policy is likely to impact on rural areas.</p>

Sustainable Warmth statements (using the Government's headings and words <i>except wording in italics</i>)		RSN initial comments
Key topics covered by the White Paper and its rationale continued.	<ul style="list-style-type: none"> • Invest a further £60 million to retrofit social housing and £150 million invested in the • Home Upgrade Grant, contributing to the manifesto commitment to a £2.5 billion Home Upgrade Grant over this Parliament. • Expand the Energy Company Obligation (ECO), a requirement for larger domestic energy suppliers to install heating, insulation or other energy efficiency measures in the homes of people who are low income and vulnerable or fuel poor. • Invest in energy efficiency of households through the £2 billion Green Homes Grant, including up to £10,000 per low income household to install energy efficient and low-carbon heating measures in their homes. • Extend the Warm Home Discount a requirement for energy companies to provide a £140 rebate on the energy bill of low income pensioners and other low income households with high energy bills, ensuring continuity for vulnerable or fuel poor consumers. • Drive over £10 billion of investment in energy efficiency through regulatory obligations in the Private Rented Sector. Additionally, lead the way in improved energy efficiency standards through the Future Homes Standard, and the Decent Homes Standard. <p>Through these schemes and standards, we will drive sizeable energy bill savings.</p>	<p>The detailed aspects of how specific measures are drafted, targeted and implemented will be key from a rural perspective. Unfortunately, the strategy is silent on the subjects of both rural proofing and any commitment to analyse rural outcomes.</p>

Sustainable Warmth statements (using the Government's headings and words <i>except wording in italics</i>)		RSN initial comments
Chapter 1: Who are we trying to help?	<p>This chapter explains what fuel poverty means and how it is measured.</p> <p>Fuel poverty is the problem faced by households living on a low income in a home which cannot be kept warm at reasonable cost.</p> <p>For a household to be considered fuel poor [under the current Low Income High Cost measure] it has:</p> <ul style="list-style-type: none"> • An income below the poverty line (including if meeting its required energy bill would push it below the poverty line), and • Higher than typical energy costs. <p>The LIHC indicator allowed us to measure not only the extent of the problem – how many fuel poor households there are – but also the depth of the problem – how badly affected each fuel poor household is [the fuel poverty gap].</p> <p>Government is updating the way we measure fuel poverty. Our aim is to better track progress toward the statutory fuel poverty target whilst still reflecting the three key drivers of fuel poverty (low income, energy efficiency and prices). The updated measure, Low Income Low Energy Efficiency (LILEE), finds a household to be fuel poor if it:</p>	<p>The annual fuel poverty statistics 2020 (2018 data) show that on average rural areas have a proportionally greater incidence of fuel poverty, 12% of rural households compared to 10.3% nationally. Moreover, rural fuel poor households are more seriously affected with an average £690 fuel poverty gap which is more than twice the national figure of £334. There are several factors for the proportionally greater incidence and severity of fuel poverty in rural areas including characteristics of the housing stock; a higher percentage of homes being off the mains gas grid; an older demographic; and lower average incomes (workplace based).</p> <p>The proposed change to the LILLEE fuel poverty definition seems logical, as the energy efficiency banding system is now widely understood and should more effectively identify fuel poor households who can be helped by improved energy efficiency measures.</p>

Sustainable Warmth statements (using the Government's headings and words <i>except wording in italics</i>)		RSN initial comments
<p>Chapter 1: Who are we trying to help?</p> <p>Continued.</p>	<ul style="list-style-type: none"> • Has a residual income below the poverty line (after accounting for required fuel costs) and • Lives in a home that has an energy efficiency rating below Band C <p>Whilst we recognise that there are households living in energy efficiency Band A, B or C homes who are unable to afford sufficient energy to keep warm, due to a very low income, most will not significantly benefit from energy efficiency measures.</p> <p>We will, however, continue to consider the needs of low income vulnerable households living in Band A to C homes under our vulnerability principle, as well as the needs of fuel poor households living in Bands D to G.</p> <p>The fuel poverty target has a clear focus on improving the energy efficiency of fuel poor homes.</p> <p>The vast majority of households that are fuel poor under the LIHC measure are also considered fuel poor under LILEE (88% or 2.1 million households).</p> <p>Government has decided to exclude Disability Living Allowance, Personal Independence Payment and Attendance Allowance from being considered as part of residual income.</p>	<p>It is regrettable that there is no rural: urban breakdown of the impact of the change in fuel poverty definition. However, as there are proportionally more Band D-G properties in rural areas compared to urban it seems that, in future, a larger proportion of fuel poor households will be in rural areas. It is unlikely that rural areas will be significantly disadvantaged by the change in terms of access to funding schemes.</p> <p>The additional commitment to protecting vulnerable low income households is also important, especially in rural areas which on average have lower incomes (workplace based) and a higher proportion of the population in older age groups.</p> <p>The cost of heating a home does not depend solely on its energy efficiency banding. Size in particular affects costs and rural homes tend to be larger and therefore more costly to heat. Whilst living in a larger homes can sometimes be a lifestyle choice options for rural households to move to smaller homes within their local community may often be more limited. Many, especially in farming families, can be living in homes passed down through the generations- they may be 'asset rich but cash poor'</p>

Sustainable Warmth statements (using the Government's headings and words <i>except wording in italics</i>)		RSN initial comments
<p>Chapter 2: The fuel poverty target for England</p>	<p>This chapter explains the Government's legally binding fuel poverty target.</p> <p>The fuel poverty target is to ensure that as many fuel poor homes as is reasonably practicable achieve a minimum energy efficiency rating of Band C, by 2030.</p> <p>While we know that other factors can affect how much it costs to keep warm, tackling the relatively low levels of energy efficiency found in England's housing stock – especially in the homes of the fuel poor – remains a priority.</p> <p>Even though we do not anticipate being able to improve the homes of 100% of fuel poor households to Band C, many households can still achieve significant savings.</p>	<p>As the issue of fuel poverty disproportionately affects rural areas the Government's ambitious targets are helpful overall. However, "as many as reasonably practicable", is hardly a target.</p>
<p>Chapter 3: Interim milestones:</p>	<ul style="list-style-type: none"> • Improving as many fuel poor homes as is reasonably practicable to Band E by 2020 • Improving as many fuel poor homes as is reasonably practicable to Band D by 2025. <p>This stepped approach reflects our principle of ensuring that we first support those facing the worst problems. F and G rated homes are more likely to be cold, expensive to heat and may be a health hazard. Introducing even the most well-established measures to these homes for the first time – such as a central heating system – can cut fuel bills significantly and provide a major uplift in comfort. An example is given to illustrate the potential cost savings resulting from moving a home from band E to Band C.</p>	<p>As the paper itself acknowledges the illustrative cost saving example does not show the cost of measures or whether measures are cost effective. It would be helpful if the cost-effectiveness of different measures could be monitored and published.</p>

Sustainable Warmth statements (using the Government’s headings and words <i>except wording in italics</i>)		RSN initial comments
<p>Chapter 4: Our strategic approach to meeting the fuel poverty target</p>	<p>This chapter sets out the Government’s vision for tackling fuel poverty across England and the strategic principles underpinning its plans for tackling fuel poverty. It also outlines a number of outcomes used for measuring progress.</p> <p>Our vision is to cut bills and increase comfort, health and well-being in the coldest low income homes, and to achieve the statutory fuel poverty target.</p> <p>This strategy sets out four principles, which guide our decisions as we tackle fuel poverty in England.</p> <p>Worst First Households living in severe fuel poverty, with the highest fuel poverty gaps, face the highest costs of maintaining an adequate level of warmth in the home.</p> <p>Cost effectiveness Adopting a cost-effective approach means getting the best return for all investment made in tackling fuel poverty.</p> <p>Vulnerability We know that some fuel poor households are more at risk from the impacts of living in a cold home than others, even if they are not necessarily the most severely fuel poor. It is right to consider the particular needs of the vulnerable – the oldest old and the youngest young, and those with a long-term health condition or disability – as we improve homes.</p> <p>Commitment 1: We will continue to publish annual fuel poverty statistics, and ensure these statistics reflect our updated view of vulnerability.</p>	<p>Again, the principles outlined in this chapter are welcome but in many cases it is difficult to identify any specifically rural dimensions.</p> <p>Cost effectiveness is an important consideration. Rural areas may have fewer providers of energy efficiency measures and lack of choice/competition, or indeed genuinely higher costs of provision to geographically scattered properties, could result in higher costs compared to similar urban homes. Cost effectiveness may also be affected by more of the rural housing stock being older.</p> <p>Commitment 1, relating to the continued publication of fuel poverty statistics is important. It would be helpful if these were supplemented by additional detailed data on the take-up/ outcomes of different schemes differentiating between rural and urban areas on a sub-regional basis.</p>

Sustainable Warmth statements (using the Government's headings and words <i>except wording in italics</i>)		RSN initial comments
<p>Chapter 4: Our strategic approach to meeting the fuel poverty target.</p> <p>Continued.</p>	<p>Sustainability It is important that fuel poverty policies align with other Government priorities, such as Net Zero, air quality and health inequalities.</p> <p>We want the next generation of fuel poverty policies to focus on upgrading homes with energy efficiency and to ramp up the deployment of low carbon heating solutions throughout the 2020s. We do not see a role for new, first time fossil fuel central heating, as a long term sustainable solution for tackling fuel poverty.</p> <p><u>Commitment 2:</u> We will ensure that future fuel poverty policies reflect the updated strategic principles for fuel poverty.</p> <p>We cannot at this point set out detailed schemes for the whole period to 2030, we have set out forward looking commitments.</p> <p>Government is interested in a range of outcomes, not all of which will apply to all schemes.</p> <p>List of outcomes:</p> <ul style="list-style-type: none"> • Progress against the target and interim milestones • Lower bills • Increased comfort • Improved health and wellbeing • Improved partnership • Improved evidence base and understanding • Improved targeting • Lower carbon emissions 	<p>A real challenge exists in retrofitting the UK's existing housing stock, which is some of the worst in Europe in terms of heat loss and energy efficiency. The government has indicated that it will move first with decarbonising off-gas grid heating where a large number of old, hard-to-decarbonise buildings are situated.</p>

Sustainable Warmth statements (using the Government's headings and words <i>except wording in italics</i>)		RSN initial comments
Chapter 5: How the Government is meeting the challenge	<p>This chapter goes through the strategic challenges explaining how the Government plans to meet them. It also provides information on key policies and commitments.</p> <p>"Improving energy efficiency is the best long term solution to tackling fuel poverty". 1.2m fewer low income households are living in Bands E,F and G homes compared to 2010.</p> <p>..We summarise the schemes available to homeowners, providing funding to low income households to improve their home's energy efficiency.</p> <p>Future Homes Standard (through Building Regulations). From 2025, the Future Homes Standard will ensure that new homes produce at least 75% lower CO2 emissions compared to those built to current standards.</p> <p>Review of Housing Health and Safety Rating System. The HHSRS is the risk assessment tool used by local authorities to assess hazards in residential properties, including excess cold. If a hazard is identified at the most serious 'Category 1' level, then the local authority has a duty to take enforcement action.</p> <p>Minimum Energy Efficiency Standards 33.6% of fuel poor households in England are living in private rented accommodation. Of homes with the poorest energy efficiency standards, those rated E, F or G, 23% are in the private rented sector.</p> <p>Proposals include:</p>	<p>The large number of different schemes can cause confusion and discourage take-up. This issue may be more acute for rural residents as trusted sources of face-to-face advice such as local Councils and the CAB are often less readily accessible than in urban areas. Many ACRE Network members manage or help deliver energy efficiency advice in rural areas and better support for them and similar rural-facing bodies could help to improve rural delivery.</p>

Sustainable Warmth statements (using the Government’s headings and words <i>except wording in italics</i>)		RSN initial comments
<p>Chapter 5: How the Government is meeting the challenge.</p> <p>Continued.</p>	<ul style="list-style-type: none"> • Raising the minimum energy performance standard to Energy Performance Certificate (EPC) energy efficiency rating (EER) Band C; • A phased trajectory for achieving the improvements for new tenancies from 2025 and all tenancies from 2028 • Increasing the maximum investment amount, resulting in an average per-property spend of £4,700 under a £10,000 cap (inclusive of VAT); and • Introducing a ‘fabric first’ approach to energy performance improvements. <p>Green Homes Grant. This scheme...provides low income homeowners in England up to £10,000 each to install energy efficiency and low-carbon heating measures in their homes.</p> <p>Green Homes Grant - Local Authority Delivery funding is available to support the retrofit of existing domestic dwellings for all tenure types...that will help improve D, E, F or G rated homes (excluding fossil fuel heating systems).</p> <p>Energy Company Obligations (ECO) The current Energy Company Obligation (ECO) is an obligation on larger energy suppliers to provide energy efficiency and heating measures for fuel poor households across Great Britain.</p> <p>The next iteration of ECO will run from 2022 to 2026 with an increase in value from £640m to £1bn per year...In England, we intend for ECO to primarily focus on insulating the worst-quality homes and improving them as close to an EPC C as is cost effective and suitable for the property.</p>	<p>The strategy states: “When we are designing policies which require entities other than Government to invest – for example, landlords – we should ensure the costs they face will be proportional to bill and carbon savings that could be achieved.” In many rural areas there is already an acute shortage of homes available to rent. Whilst measures that support the upgrading of privately rented property will benefit many private sector tenants, it is important that new legislation does not result in unintended consequences such as landlords switching from longer term to holiday or short-term rentals.</p> <p>The current ECO scheme contains a rural delivery target requiring a minimum of 15% of the total to obligation to be used in rural areas. A similar, or indeed higher, percentage for rural areas should be included in any future ECO scheme to ensure that rural fuel poor households are not disadvantaged in comparison with often easier to reach urban households.</p>

Sustainable Warmth statements (using the Government's headings and words <i>except wording in italics</i>)		RSN initial comments
<p>Chapter 5: How the Government is meeting the challenge.</p> <p>Continued.</p>	<p>Commitment 3: We will monitor the delivery patterns of fuel poverty energy efficiency schemes such as ECO and parts of the Green Homes Grant Voucher and LAD schemes, to identify where delivery is at lower than expected levels. Home Upgrade Grant The Home Upgrade Grant [due to commence in early 2022] will support low-income households with upgrades to the worst-performing off-gas-grid homes in England.</p> <p>Home Upgrade Grant The Home Upgrade Grant [due to commence in early 2022] will support low-income households with upgrades to the worst-performing off-gas-grid homes in England.</p> <p>Green Finance Green finance is a key priority for the Government...Government published a consultation in November 2020 on how mortgage lenders can help householders in England and Wales to improve the energy performance of their homes.</p> <p>Social Housing 15.1% of fuel poor households in England live in social housing. The majority of these fuel poor households have an energy efficiency rating of Band D. The Social Housing Decarbonisation Fund is intended to be open to all social housing landlords to directly access funding.</p> <p>Many of these schemes and standards can work together.</p> <p>Working together to help the fuel poor through partnership and learning.</p> <p>Helping those on low incomes who face the highest energy bills and live in the hardest to heat homes requires a concerted effort with contributions across Government and, very importantly, beyond Whitehall.</p> <p><i>This section refers to the roles of various Government departments BEIS,DWP,DHSS,PHE,MCLG and Defra and of local partners giving examples of good practice. There are 3 specific commitments:</i></p>	<p>It is essential that this commitment should include analysis of rural take-up at a fine geographical grain to ensure that harder to reach fuel poor rural households are not disadvantaged.</p>

Sustainable Warmth statements (using the Government's headings and words <i>except wording in italics</i>)		RSN initial comments
<p>Chapter 5: How the Government is meeting the challenge.</p> <p>Continued.</p>	<p><u>Commitment 4:</u> We will ensure that the design of new domestic energy schemes and policies, and reviews of existing schemes, have regard for fuel poverty.</p> <p><u>Commitment 5:</u> We will continue to work with local partners where appropriate, giving justification for the approach during planning and design.</p> <p><u>Commitment 6:</u> Government will engage with, listen to and support people and groups working on the frontline, tackling fuel poverty in communities across England. Fuel poverty is a devolved issue Coordination between the four nations of the United Kingdom makes each more effective.</p> <p>International</p> <p><u>Commitment 7:</u> We will share our world class expertise on fuel poverty with international partners.</p> <p>Increasing effective targeting of fuel poor households <i>This sub-section considers eligibility criteria, referral routes and targeting tools for fuel poverty schemes.</i></p> <p>Eligibility. Ensuring the right eligibility criteria is important. It enables us to use effectively to support those most in need. Setting of eligibility criteria can also be difficult, making decisions regarding prioritisation complicated, especially when there may be some tension between the guiding principles. This may include a tension between the vulnerability and worst first principles.</p>	

Sustainable Warmth statements (using the Government’s headings and words <i>except wording in italics</i>)		RSN initial comments
<p>Chapter 5: How the Government is meeting the challenge.</p> <p>Continued.</p>	<p><i>Government</i> plan to consult on reforms to the Warm Home Discount scheme which would focus on removing the first-come first-served. It is important that energy bill rebates are targeted as much as possible towards people in or at risk of fuel poverty. However, in reforming the scheme, consideration will need to be given to the impacts on low-income pensioners, who may have come to rely on automatic rebates.</p> <p>Expanding the provision of automatic rebates through data matching.</p> <p>For a successor scheme to ECO, we are considering how we could also target other low income households that may not be entitled to or may not be claiming benefits, but need energy efficiency improvements to their home.</p> <p><u>Commitment 8:</u> We will seek to improve targeting in the next generation of national fuel poverty schemes, by building new proxies that reflect the Low Income Low Energy Efficiency indicator and looking for opportunities to extend the use of data matching wherever practical and appropriate.</p> <p><u>Commitment 9:</u> We will work to improve targeting by enabling and facilitating more data sharing. This includes working to remove barriers to data sharing in the health arena.</p> <p>Targeting tools Effective targeting... may be through referrals, data mapping and data matching services.</p> <p>We are considering the most appropriate referral routes, from mortgage lenders to healthcare professionals to charity partners, for the next generation of fuel poverty schemes.</p>	<p>It is important that energy bill rebates are targeted as much as possible towards people in or at risk of fuel poverty.</p> <p>However, as the paper acknowledges, in reforming the scheme, consideration will need to be given to the impacts on low income pensioners, who may have come to rely on automatic rebates.</p> <p>Given the scattered pattern of rural fuel poor households BEIS should target needy households rather than needy areas. It is important that these steps do not disadvantage harder to reach fuel poor rural households.</p> <p>There are potential disadvantages for rural areas from the targeting tools approach. Many rural fuel poor households are in scattered or isolated locations rather than in “clusters”. It should be explicitly accepted that rural fuel poor households are often harder to identify and more costly to reach.</p>

Sustainable Warmth statements (using the Government's headings and words <i>except wording in italics</i>)		RSN initial comments
<p>Chapter 5: How the Government is meeting the challenge.</p> <p>Continued.</p>	<p>We are also considering how self-referral could play a role in fuel poverty schemes.</p> <p>We are continuing to improve the targeting tools available; for example, the Domestic Energy Map supports ECO-obligated suppliers to identify geographical clusters of homes who may be eligible for support.</p> <p>Improving the reach of support to certain high-cost homes This fuel poverty strategy covers low income households in all inefficient homes...we aim to reduce barriers to accessing support for households living in certain home types including:</p> <ul style="list-style-type: none"> - Hard to treat homes; - Park homes; - Houses in Multiple Occupation (HMOs); and - Homes off the mains gas grid. <p>Homes which are not connected to the mains gas grid often face particularly high fuel bills. The next 10 years will see a radical shift in the way homes off the gas grid are heated...We intend to limit our support for new gas heating systems, and remove support for new LPG and oil heating systems from 2022. ...This would be with a view to supporting fuel poor households to transition to low carbon heating.</p> <p><u>Commitment 10</u>: We will seek to ensure fuel poor households, especially those off the gas grid, are early beneficiaries of the transition to low carbon heating.</p>	<p>Improving support to certain high cost homes will be generally helpful in rural areas where there are proportionately more hard to treat homes; more Park Homes and fewer homes with access to the mains gas grid.</p> <p>Government should take a technology neutral approach to the replacement of current home heating in off gas grid areas and support a range of appropriate technologies including bioLPG; heat pumps; local heat networks and (in due course) hydrogen. This will help with different circumstances in different buildings.</p> <p>As a lower percentage of rural households are on the mains gas grid commitment10 should be particularly beneficial to rural areas.</p>

Sustainable Warmth statements (using the Government's headings and words <i>except wording in italics</i>)		RSN initial comments
<p>Chapter 5: How the Government is meeting the challenge.</p> <p>Continued.</p>	<p>Improving the reach of support</p> <p>It is important to consider different forms of communication and access points. Simple Energy Advice (SEA) has a website which has been designed with accessibility in mind. SEA further offers a freephone number.</p> <p>Citizens Advice also provides energy advice through its local offices across England and Wales to support energy consumers in vulnerable situations.</p> <p>...the Warm Home Discount rebate will become more accessible if it is automatically given to eligible households, rather than households needing to apply to receive it.</p> <p><u>Commitment 11:</u> We will consider how to make fuel poverty schemes easier to access for households facing barriers to support.</p> <p><u>Commitment 12:</u> We will explore how energy advice could be better provided to households facing particular barriers to support.</p> <p>Certain low income households are particularly vulnerable to the effects of a cold home.</p> <p>Older people and people with certain health conditions, such as heart problems, asthma, depression or chronic obstructive pulmonary disease, can see their symptoms improve or even have their life extended by living in a warmer home. BEIS, MHCLG, DHSC and PHE, will continue to work together alongside other Departments to ensure low income and vulnerable households have access to safe and warm housing.</p>	<p>SEA is helpful. However the number and complexity of different schemes to improve energy efficiency suggests that detailed face-to-face advice will be needed by many potentially eligible households. Rural households are likely to face more difficulties in accessing such advice, e.g. through CAB, due to distance and travel issues and also due to poor broadband and mobile connectivity.</p> <p>The automatic application of the Warm Home Discount will be a significant help to eligible households, perhaps particularly so in rural areas where the take up of benefits is thought to be lower.</p>

Sustainable Warmth statements (using the Government's headings and words <i>except wording in italics</i>)		RSN initial comments
<p>Chapter 5: How the Government is meeting the challenge.</p> <p>Continued.</p>	<p><u>Commitment 13:</u> We recognise the link between fuel poverty and health and wellbeing and we are committed to developing a means of measuring this.</p> <p>A fair and functioning energy market We support consumers to switch suppliers by providing quality advice.</p> <p>There are still too many families living in a cold home after selfrationing or self-disconnecting from their prepayment meter (PPM).</p> <p>Ofgem is introducing new licence requirements on energy suppliers to:</p> <ul style="list-style-type: none"> - identify PPM customers who are self-disconnecting; - offer short-term support through emergency and friendly hours credit to all PPM customers and additional support credit to PPM customers in vulnerable situations who have self disconnected or self-rationed; and - support all domestic customers who are facing financial difficulties through the inclusion of updated Ability to Pay principles. <p>The Government is committed to ensuring fair energy prices for consumers. The energy price cap protects up to 11 million households on standard variable and default tariffs... and 4 million vulnerable consumers are protected by the Safeguard Tariff.</p> <p><u>Commitment 14:</u> We will seek to ensure that the fuel poor benefit from efforts to connect consumers with their energy use, as we establish a smart and flexible energy system to work towards the Net Zero target.</p> <p>Enhancing and improving understanding of fuel poverty</p>	<p>The Big Energy Saving Network, funding to CAB and ACRE Network members has helped many vulnerable households and a scheme like this is much needed in rural areas.</p> <p>These measures will be beneficial but it is unclear whether there are any particularly rural implications.</p> <p>One rural issue not mentioned is the difficulty in accessing places to top up PPM keys.</p>

Sustainable Warmth statements (using the Government's headings and words <i>except wording in italics</i>)		RSN initial comments
<p>Chapter 5: How the Government is meeting the challenge.</p> <p>Continued.</p>	<p><u>Commitment 15:</u> We will continue to identify gaps and work with others to improve the evidence base on fuel poverty.</p> <p>Health ...there are still areas where the research is not as clear as we would like... gaps in the evidence include: - the effect of housing quality as determinants of cold-related adverse health outcomes; - the interaction of socio-economic deprivation and fuel poverty with other potential determinants of vulnerability; - child health; and - impacts of fuel poverty/poor housing on mental well-being.</p> <p>Decarbonisation As the energy system changes in preparation for Net Zero, we want to understand how households in fuel poverty can benefit. We welcome research on the likely impacts of decarbonisation for households in fuel poverty.</p> <p>Education and employment We are not aware of strong evidence that fuel poverty causes worse socio-economic outcomes. However, we would be interested in research examining any potential link between fuel poverty and education, employment, productivity or "life chances" more generally.</p>	

Sustainable Warmth statements (using the Government's headings and words <i>except wording in italics</i>)		RSN initial comments
<p>Chapter 6: Reviewing the strategy and scrutiny of progress.</p>	<p>Our final chapter sets out how we will be open and transparent as we implement the strategy</p> <p><u>Commitment 16:</u> We will continue holding an annual debate in Parliament on fuel poverty.</p> <p><u>Commitment 17:</u> In line with the Statistics Code of Practice, we will work toward publishing our annual fuel poverty statistics more quickly, with the ultimate aim of publishing within one calendar year of the data being collected.</p> <p><u>Commitment 18:</u> We will seek to report on fuel poor households using renewable technologies in future when greater levels of deployment make statistical reporting feasible.</p> <p><u>Commitment 19:</u> We will seek to evaluate domestic energy efficiency schemes, making the results of the evaluations public and learning lessons to improve current and future fuel poverty schemes.</p> <p><u>Commitment 20:</u> The Committee on Fuel Poverty will continue to have an active role in relation to scrutiny of progress on fuel poverty.</p>	<p>A detailed rural cut of the statistics is essential.</p>