



*A grassroots campaign taking action against mammoth fuel bills and working towards an affordable, sustainable and democratic energy system*

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## **Fuel Poverty Action (FPA) response to consultation on the UK Government's Fuel Poverty Strategy for England**

### **Introduction**

FPA is a grassroots organisation working with residents and energy users who struggle to pay bills or to keep warm.

We have responded to those questions that we feel are most relevant to our work, but we have serious questions about how this Strategy will be used. We are forced to ask what is the point of revising government targets for improved energy efficiency measures, when there appears to be no intention of meeting these targets, and the programmes that were moving in the right direction have been axed and never replaced. We wonder what it means to talk about attention to vulnerable people when the basics -- incomes and benefits -- have been under sustained attack, affecting most severely women, children, and people with disabilities, and when social care and the resources of local authorities have been decimated.

Moreover, we are deeply concerned that the focus on ever more finely honed "targeting" is at the expense of making more resources available for *everyone* who needs them. The end result can be a low standard overall, supplemented by limited "special" measures and charities, as we have seen with food banks, which already sometimes include a provision for fuel. Like all means-testing, targeting of energy efficiency measures on "fuel poor" households risks leaving out many people who desperately need them but who do not meet criteria, eg because they have been -- often unjustly -- excluded from passporting benefits, or because an EPC assessment was inadequate or because some other factor in their personal situation is not taken into account. An example is the way disabled people wrongly refused benefits by ATOS or Capita are excluded from Warm Home Discount and therefore also from the Vulnerable Customer Safeguard Tariff.

We therefore do not engage below with the definition of "fuel poverty" (although we are glad to see the "relative" element removed) or with the other provisions designed to improve targeting.

Moreover, since a home that qualifies one year may not qualify the next, and vice versa, it is highly inefficient to spend huge resources identifying qualifying households. Equally, it makes no sense and is very inefficient to insulate one home but not the ones next door or on the same landing. We therefore welcome flexibility (as for ECO) and endorse the call for a whole-neighbourhood approach mentioned in point 26.

We believe a policy should be developed that responds to residents' demands. We have worked with residents (with both social and private tenures) in several housing estates --

new build and older -- whose homes are uninsulated and who have been fighting for a remedy for years, through their tenants and residents associations, without success. The same applies to some individual tenants who are not on estates. A policy aimed at improving energy efficiency which fails to respond to such active demands is not doing what it claims. While the new Homes (Fitness for Human Habitation) Act will soon apply to more tenancies, it will not solve the basic problem of landlord/developer unaccountability, and lack of active support for residents seeking redress, who instead may be threatened or even evicted. It cannot be up to residents to win a court case before they get insulation. Instead, help should be readily available and widely advertised (including on social media and television). If requests for help were welcomed and responded to, many more fuel-poor people would identify themselves.

In the aftermath of the Grenfell fire, we also want to emphasise the need for insulation, and cladding, on buildings of every height, to be both non-flammable and non-toxic. Toxicity is most obvious and most deadly in case of fire - to the extent that some residents in the Grenfell area do not want insulation on their homes at all. The effect on indoor air quality of many insulating materials - and other materials used eg for window surrounds - is increasingly recognised as an important issue in other countries but appears to be little considered here. It can affect particularly unborn babies. We believe regulations requiring insulation must also require it to be safe.

While we welcome the emphasis on energy efficiency, which is fundamental to reducing both fuel poverty and carbon emissions, we believe it is misleading to call something a "Fuel Poverty Strategy" when it leaves out so many other considerations that are also critically important. These issues include (but are not limited to):

- cuts in incomes, benefits, social care, and housing, including Universal Credit; bedroom tax; multiple, cumulative, disability benefit cuts (see Q 19)
- heating systems designed, installed and run for profit that don't work or prove unaffordable (eg many heat pumps, and district heating networks, which still are not even regulated)
- insulation that is flammable, and often toxic, and has to be removed, or that is so badly installed that it blocks ventilation and leads to damp
- the crisis facing people who, for this reason or others, suffer break-downs in their shelter or their heating systems and are expected to pick up the bill
- bringing in new nuclear power plant which is going to add substantially to everyone's bills
- abandoning onshore wind (the cheapest energy) and cutting the rug from under the solar industry
- the 2015 scrapping of the zero carbon homes policy
- privatised utilities and private provision of heat networks; privatisation has not improved prices or service but has had the opposite effect. They should be taken back into public hands.
- the exclusion of bedsits and HMOs from many provisions, and the construction of thousands of units of so-called temporary housing that freeze in winter and fry in the summer, including steel shipping containers and many pre-fabs.
- housing - and retrofit - standards destroyed by lack of accountability of landlords, developers and contractors, lack of onsite surveyors and supervision, underfunding

of local authorities, outsourcing of local authority building work, closure of technical colleges and more.

- unaccountability to residents so that complaints are not dealt with.
- the lack of rights, and enforcement of existing rights, for social housing tenants, private sector tenants, and leaseholders
- the cuts to legal aid and resources for law centres and advice services including the government's own; increased reliance on online provision which is unsuitable for many people in fuel poverty.

In addition, there is the fact that as your report acknowledges, heating will have to change dramatically given the climate emergency. We believe the whole landscape of tariffs, taxes, and funding for green initiatives needs to be overhauled in the light of the urgent need to decarbonise while protecting people who struggle to pay our bills.

There needs to be a full, public consultation on protection for fuel poor customers. This should include consideration of an energy allowance, provided free or at very low cost, funded primarily by higher tariffs beyond the level of this allowance, which must be enough to meet basic needs. (See Q17)

Sidelining these issues in a "Fuel Poverty Strategy" makes it less likely that they will be dealt with, even if some of them come under other policy areas.

Nevertheless we want to comment on some of the specific issues raised in your report. We endorse many of the points made by the End Fuel Poverty Coalition (EFPC), of which we are a member (text that we endorse from EFPC's submission is in Century Gothic font.) This includes the fundamental point that they make in their introduction :

**“. . . It doesn't have to be this way.** Ending fuel poverty is in our grasp through a National Energy Efficiency Programme, fully funded support for those in fuel poverty and reform of the private rented sector.

"The most pressing issue to address in the Review of the Government's Fuel Poverty Strategy is the lack of adequate resource to meet the statutory energy efficiency fuel poverty requirements in England.

. . . "Beyond the increase in funding, government should also set a longer term framework for energy efficiency:

- a. Better regulation of the private sector
- b. Make the Energy Company Obligation (ECO) Scheme more accessible to those in greatest need
- c. Introduce more locally led schemes to improve energy efficiency, backed up by a national "safety net"
- d. Make sure all households, through a single web/phone contact, can access free, independent, locally provided energy advice and support
- e. Ensure all improvements are of the highest and safest quality
- f. Examine financial measures to improve energy efficiency such as stamp duty reforms, zero interest loans etc.

All of this must be backed up by a real commitment by the Westminster Government to honour its interim fuel poverty targets, together with specific statements in the policy plan as to how these commitments are to be delivered."

## Detailed response to consultation questions

1. **Do you agree with the Government's proposal to update the fuel poverty metric to Low Income Low Energy Efficiency? If not, which metric would you prefer and why?**
  - Please see our introductory comments, above.
  
2. **The proposed metric update – LILEE – would necessitate certain updates to the current methodology, namely as regards the high costs threshold, but the other aspects of the current LIHC methodology would not necessarily need updating. Do you have views or evidence on whether Government should update those other aspects of the methodology on the introduction of LILEE**
  - Please see our introductory comments, above.
  
3. **Do you agree that Government should retain the current target and interim milestones? ,**
  - Please see our introductory comments, above. If the target and milestones are retained, we agree with the EFPC response that there should be a very strong focus on proposals for achieving the 2020 target, and that the overall target should be reviewed no later than 2025.
  
4. **Do you have views or evidence on our proposal to add more detail on, and clarify, the meaning of the 'Worst First' principle, including the considerations raised above?**
  - Please see our introductory comments, above.
  - We agree with the EFPC response that the strategy should be updated to give an emphasis to whole-house retrofits. The more that can be done on each visit, the better. This does not automatically mean that there is an uplift to C – that is a decision for the occupant as well as the government, based on the amount of upheaval the householder is able to tolerate. However, to put in improvements step by step, each time coming back to the home and having to fix appointments again and again can also be intrusive. Many people would prefer to get the work done all at once, especially if that means they will really be warm.
  
5. **Do you have views or evidence on our proposal to add more detail on, and clarify, the meaning of the cost-effectiveness principle, including the considerations raised above?**
  - We do not believe cost-effectiveness is a valid criterion where the alternative is people being forced to remain in housing that could lead to serious illness or death, as is the case with many F and G properties. It is a national scandal that there are such homes in the UK.
  - We also agree with the EFPC's response that any cost-effectiveness test that *is* applied must better "quantify the co-benefits of energy efficiency programmes, particularly the health benefits and subsequent NHS savings. BEIS must also work to better understand the life-time effects on children

brought up in cold homes and suffering from reduced life-chances as a result." As the EFPC's response says, "in order to reach the fuel poverty target, solid wall houses will need improving. Basic cost benefit analysis, such as simplistic payback periods, will often assess such improvements as not cost effective." But "taking into consideration the health benefits, and associated savings, then most solid wall construction does become cost effective and 'reasonably practicable'."

**6. Do you have views or evidence on our proposal to add more detail on, and clarify, the meaning of the vulnerability principle and, in particular, on our proposed changes to the meaning of the principle?**

- We agree with the proposed extension. We do not believe that only people in homes with poor energy efficiency should be eligible for help under a fuel poverty strategy. While it should not be allowed to reduce the resources available for insulation or other energy efficiency measures, that support can and should take many forms.

**7. Do you agree with our proposal to create a fourth principle on aligning fuel poverty strategy with current and future Government priorities? Do you have views or evidence that may be useful in creating this principle?**

**a) Sustainability**

- We absolutely agree that a principle should be created, and put into practice, which aligns fuel poverty strategy with strategy on clean, sustainable warmth and coolth. There is a false contradiction sometimes posed by the media and others between acting against climate change and acting against poverty. In fact, climate change creates and exacerbates poverty, both in other countries and here, through rising food prices, water shortages, floods, storm damage, fires, insurance costs, and other effects. Most prominently, it can lead to severe cold, overheating, and unaffordable costs of keeping warm or hot in extreme winter weather and in heatwaves. This includes deaths. It also has the effect of displacing people from their homes, within and between countries, with all the heartbreak, costs and readjustment that that entails.
- We are glad to see your acceptance that this means reassessing the role of mains gas. For reasons that are widely known and documented elsewhere, hydrogen gas is unlikely to successfully take the place of natural gas (in whole or in part) and on current evidence we do not believe investing in a transition to hydrogen is the way forward.
- Just as mains gas must be phased out in domestic heating, it must also not be used to produce electricity (which itself is used to heat and power homes).
- This commitment is not consistent with the continuation of fracking.
- We agree with your commitment to end support for oil but not at the expense of off-grid households ending up in the dire conditions which many have experienced till now. Please see our submission a year ago on this question [here](#). Oil must be phased out, but in the meantime we do not believe it is right to refuse to replace old, broken-down, or inefficient oil heaters, as has been happening since this summer.
- The logic of this position on fossil fuels leads inevitably to an emphasis on energy efficiency, and also to increased support for and development of renewable energy -- solar, wind, waste heat, geothermal, wave, tidal and other. It is not aligned with a continued refusal to support onshore wind which is now in many

cases the cheapest way to produce power, or with the removal of support from what was a burgeoning solar power industry in the UK, including home solar.

- Nuclear power is expected to substantially add to our bills; developing this power source will increase fuel poverty.
- Many biofuels are not, in fact, sustainable, and the biofuel boilers installed in many district heating systems have proved to be a con, inserted to get a development proposal through planning approval, but never intended to work. They are removed and replaced with gas boilers, often after years in which residents freeze, have no hot water, and are forced at great cost to heat their homes with electric space heaters for long periods.
- Similarly, heat pumps (eg the Nibe model often used in social housing) have often proved to be dysfunctional or inappropriate for the homes in which they are installed, leading to huge costs and cold for residents, as well as intolerable noise and taking up a huge amount of space. While heat pumps can, indeed, be magic when suitably designed and appropriately installed, government fuel poverty and sustainability programmes should not support disasters.
- District heating too can, as promoted, bring down costs and carbon emissions. The transition away from gas boilers is likely to rely heavily on district heating. However, given the ways in which it is currently financed, designed, installed and managed in the UK context, it very often leads to constant outages, no hot water, and very high costs, both day-to-day and through large capital sums required for periodic refurbishment. Again, this can lead to fuel poverty, produced by a system intended to alleviate it. We have regularly documented these issues in consultation submissions and in accompanying residents to BEIS. Regulation, now promised, is welcome but will not solve these fundamental crises. Moreover, the most common heat source is gas CHP -- boilers burning fossil fuels, with all the attendant costs in carbon emissions and air quality -- and, in many if not most locales, models other than CHP are currently problematic or very expensive. These problems must be overcome. Government fuel poverty and sustainability funding should not be encouraging what for many residents may prove to be a disaster.

#### **b) Health**

- We agree that fuel poverty policy and health policy should be aligned, and combined, for the reasons you state. A warm home is far better than medication.

#### **c) Funding**

We agree with the EFPC that

- "The reliance on consumer funded mechanisms also makes the current policy landscape exceptionally regressive and the few policies funded through taxation - like the Renewable Heat Incentive - have done very little to support fuel poor householders to offset the cost of installing low carbon heating systems in their homes due to the way the scheme operates."

#### **d) Tariffs, taxes and levies**

- We would add that the above point includes so-called "green levies" on bills (in fact, in large part social, rather than green) which are regressive, falling heavily on those fuel poor people who need a lot of heat, instead of being based on contributions according to income. We believe the whole landscape of tariffs, taxes, and funding for green initiatives needs to be overhauled in the light of the urgent need to decarbonise while protecting people who struggle to pay our bills.

**8. Would you suggest any other guiding strategic principles? Do you have any other views or evidence on the guiding principles?**

- Yes. Please see our introductory comments, above. We have not cited much evidence as we expect that the consultation will only actually focus on the limited areas you have chosen to include in the policy, but we would welcome a broader focus and would be willing to back up the points we make there.

**9. Keeping in mind the strategy's guiding principles, what policies might be included in a policy plan to improve energy efficiency for households in fuel poverty?**

In addition to the points made in our introduction about standards and accountability in installation/refurbishment, we would endorse many of the policies presented by the EFPC as below, which make clear the total inadequacy of what is supposed to be the central pillar of government action on fuel poverty:

- "The most pressing issue to address is a lack of adequate resources to meet the statutory energy efficiency fuel poverty requirements in England.
- "According to the CFP, the funding gap to meet the 2030 target stands at £6.2bn, after accounting for the Clean Growth Strategy proposals. This gap is likely to increase with the adoption of the LILEE measurement.
- "Central investment will therefore be needed if the Government is to achieve the 2020 and 2025 fuel poverty milestones.
- "The Committee on Fuel Poverty recommended that to achieve the 2020 milestone, Treasury should allocate circa £1 billion of funding to run from 2019 to 2021. They also recommended that a further £1.8 billion should be allocated to run from 2022 to 2025 in order to achieve the 2025 milestone. "

A most significant move would be the reintroduction of national, publicly funded support, which should start with but go beyond that provided by the previous Warm Front scheme, which was insulating large numbers of homes until it was terminated.

We also think resources should be allocated to local cooperatives, which are already working to provide low cost energy, energy efficiency measures, advocacy and advice.

Without the funding, policies mean little.

**10. What commitments, whether new or retained from the 2015 strategy, might supplement the policy plan in the updated strategy to improve energy efficiency for households in fuel poverty?**

- At the least, we agree with the EFPC response that the government should restate its commitments to its milestones but the key one right now is 2020. However challenging this may be at this point, since so little has been done so far, it is absolutely urgent. No one will take seriously a government commitment to tackle fuel poverty or climate change if its own immediate goals are missed. This can only lead to a conclusion that the later, statutory, commitment is impossible to achieve. And in any case action later will not reverse the deaths that take place before implementation.
- In fact, we believe the 2025 milestone should be very substantially tightened, both to prevent both further winter deaths and to act against runaway climate change. With the deadly feedback effects of every rise in global temperature, steps taken NOW are far more valuable than anything may be done later.

**11. Keeping in mind the strategy's guiding principles, what policies might be included in a policy plan to improve partnership and learning on fuel poverty?**

- Please see the point in the introduction, above, re responsiveness and accountability to residents.

**12. What commitments, whether new or retained from the 2015 strategy, might supplement the policy plan in the updated strategy to improve partnership and learning on fuel poverty?**

- Please see the point in the introduction, above, re responsiveness and accountability to residents.
- We agree with the EFPC's calls for local authorities to be required to submit annual, accurate progress reports on tackling fuel poverty, based on actual data and properly scrutinised by central government.
- Local authorities must also commit to providing a fixed number of social housing each year, whether from new builds or conversion/return of existing housing to the social housing stock from which so many homes have been taken.
- These requirements should not be contingent on additional funding, but BEIS must recognise that if local authority funding base is not restored, they are unlikely to lead to very much action.

**13. Keeping in mind the strategy's guiding principles, what policies might be included in a policy plan to improve targeting for households in fuel poverty?**

- Please see our introductory comments, above.

**14. What commitments, whether new or retained from the 2015 strategy, might supplement the policy plan in the updated strategy to improve targeting for households in fuel poverty?**

- Please see our introductory comments, above.

**15. Keeping in mind the strategy's guiding principles, what policies might be included in a policy plan to support households in fuel poverty in high cost homes?**

- So-called "temporary" accommodation (which in some cases can last for years) must be included in fuel poverty provision. This includes run-down homes including those on condemned estates waiting for redevelopment; prefabs; and now, shockingly, shipping containers.
- Off-grid properties require in some cases major funding and expert attention to be made liveable. In many cases they are solid wall rural properties and the people who live in them, at or even above, the normal low rural income levels, cannot afford the major refurbishment required. Ironically, they may see neighbouring properties, used as holiday rental homes, made snug and warm for Christmas holiday guests; picturesque views offered to these guests include cottages where local people are freezing.
- Please see our points about replacement of oil heaters, above and [here](#)



- A fundamental problem is the inability of private rented tenants to confront their landlords for fear of eviction due to lack of legal protection, lack of legal aid and services, and lack of alternative housing.
- In addition the £3,500 limit on spending expected from slum landlords under MEES is far too low, and it is essential to clearly state how MEES will be enforced, and to ensure that improvements to the basic standard required in law do not lead to increased rent.
- We agree with the EFPC that “The recommendation by the Committee on Fuel Poverty for a national registration scheme for landlords is the first, essential, but minimum step. We also consider tenants’ rights, particularly with respect to security of tenure, need improving. This would help improve tenants’ confidence in pressing their landlords to meet their statutory responsibilities.”

**16. What commitments, whether new or retained from the 2015 strategy, might supplement the policy plan in the updated strategy to support households in fuel poverty in high cost homes?**

**17. Keeping in mind the strategy’s guiding principles, what policies might be included in a policy plan to improve support for low income households who are most at risk for adverse health outcomes from living in a cold home?**

- We are interested in the idea of “social prescribing” if it can leverage support for people to get help with their cold (or overheated) homes. It must not, however, increase costs on the already overburdened NHS, which is already picking up the tab for failures of poverty and housing policies.

**18. What commitments, whether new or retained from the 2015 strategy, might supplement the policy plan in the updated strategy to improve support for low income households who are most at risk for adverse health outcomes from living in a cold home?**

**19. Keeping in mind the strategy’s guiding principles, what policies might be included in a policy plan to decrease the financial burden of energy bills for households in fuel poverty?**

- The Warm Home Discount has been crucial and until better measures fully replace it it must be maintained, ie if necessary extended past its current end date of 2021, including retention of the industry initiative part of the scheme. However the arbitrary “first come first served” nature of the scheme is unacceptable, and the reliance on passporting through disability benefits means that when those benefits are denied, often unjustly (see above) people also lose the support for their heat -- despite the fact that they may need it more than anyone. The differences between suppliers are also a problem, as is the fact that people can unknowingly lose their discount if they switch supplier at the wrong time of year.
- Prepayment customers should not pay a higher rate than those who buy their energy on credit. “Self-disconnection” sounds voluntary and does not describe what happens when the meter runs out and everything in the house -- heat, light, fridge, freezer, TV, any digital appliances, phone charger, everything -- goes dead, regardless of whether you are ill, or have a baby to care for, or your child has an exam the next day. Similarly, “self-rationing” does not convey what it means for a

pensioner to keep the heat on, as many do, only for an hour or two a day, in one room, or for mothers to wait (also without eating) for the children to come home before they turn on the heat. Standing charges are a major problem for people on prepayment meters who can run up prohibitive back-charges that prevent them accessing any energy. All of these issues need urgent attention, as does the fact that, in practice, people are still routinely pressurised or forced onto prepayment meters without fully exploring other options. Those protections that are in place, or planned, are only helpful to the extent that they are enforced.

**20. What commitments, whether new or retained from the 2015 strategy, might supplement the policy plan in the updated strategy to decrease the financial burden of energy bills for households in fuel poverty?**

A change of direction on benefits, pensions, and wages to reverse the damage done by austerity and go further to ensure that everyone has an adequate income. In particular:

- Much fuel poverty has been created by cuts to benefits, including universal credit which has plunged many households into debt and destitution, the bedroom tax, cuts to housing benefit and council tax benefit, the benefits freeze, and many more. Women, and single mothers in particular, have been disproportionately affected by cuts.
- Benefit entitlement checks are important but are undermined by the cuts to entitlement, and by arbitrary and brutal decisions by DWP staff and particularly outsourcing -- firms employed to cut people's benefits (see introduction).
- Most shocking are the cuts to people who may most need to keep warm; this is leading to many deaths.
- Disability benefits have been targeted above all, including severe and enhanced disability premiums, PIP after the scrapping of DLA, cuts and massive increases in charging for social care, unfulfillable work requirements, and more, sometimes leading to suicide.
- The terrible toll of "excess winter deaths" falls primarily on pensioners, over a million of whom are in fuel poverty. The UK has the lowest state pension in terms of the amount of average earnings it replaces, of any developed country, ranking last out of 37 OECD countries. Reliance on means-tested supplements is particularly deadly for older people, with much pension credit and other help remaining unclaimed. The National Pensioners Convention (NPC) has collated devastating statistics in their 2018 "Age Audit" and in their Fuel Poverty Policy. Eighteen percent of over 75s live in poverty. One in three older people live in homes with inadequate heating or insulation, and although they may own their own homes, many have no money or capacity for improvements or even repairs. People over the age of 65 contribute £61 billion more to the UK economy through employment, tax, volunteering and childcare than they receive in pensions, benefits and other services.
- Yet instead of improvements, things have got worse. The NPC remind us that when the winter fuel allowance was first introduced, it covered at least one-third of heating bills; today its value is a fraction of that. Many pensioners have been subject to further cuts, eg many mixed-age couples, and the tens of thousands considered to have been overpaid. Over the past seven years, the proportion of older people unable to afford a decent standard of living has increased from 23% to 32%.
- The closure of libraries, pensioners' lunch clubs, day centres, and other communal spaces mean many people can no longer keep warm in the daytime. Unlike people who are out at work all day, those with least resources must find the means to pay for heating 24/7.

- The growth of precarious employment, eg zero hours contracts, and low wages, lead to many fully-employed people and families resorting to food banks. These are also basic causes of fuel poverty, in fact some of these food banks also now offer fuel.

**21. Keeping in mind the strategy's guiding principles, what policies might be included in a policy plan to create a fairer energy market for households in fuel poverty?**

- We believe that energy should be taken back into public hands. It is now perfectly clear that switching will not provide a solution for customers in poverty. Many people do not have time, may not be online, and, crucially, do not trust the market to deliver. Publicly owned utilities would be easier to control and would not have the imperative to make a profit. While *collective* switching schemes have helped, the government's enthusiasm for competition as a solution to high prices is not shared by the general public, or at least the poorer part of it, who would widely prefer one good service that works well and is not expensive.

**22. What commitments, whether new or retained from the 2015 strategy, might supplement the policy plan in the updated strategy to create a fairer energy market for households in fuel poverty?**

- Ofgem should report annually to the government on the extent to which policies have been delivered and the government should respond publicly with how they are going to remedy any shortfall.

**23. Keeping in mind the strategy's guiding principles, what policies might be included in a policy plan to improve the evidence base on fuel poverty?**

**24. What commitments, whether new or retained from the 2015 strategy, might supplement the policy plan in the updated strategy to improve the evidence base on fuel poverty?**

- As per the EFPC response, we believe the government should commit to including the costs to the NHS in all new policy on fuel poverty.

**25. Are existing arrangements sufficient to meet our commitments to review and scrutinise Government action on fuel poverty?**

**26. Do you have any further views or evidence on how the 2015 fuel poverty strategy should be updated?**

Beyond the points made in response to the listed questions, we have laid out a number of new proposals in our introduction. In addition,

- There must be a national telephone service offering free help to people struggling to pay their bills or seeking advice on energy saving. It is totally unacceptable that advice is currently only available online, when many of the people who need it most cannot or are not able to access it. There is also a pressing need for expert face-to-face advice to be available locally.
- In some situations home visits are essential. Making such a service widely available would enable many more people to explain their situations to someone who could see the problems first hand and consider their solutions. It would also enable more realistic local assessments of how much is needed and where. At present, home visits are provided in some places by voluntary

organisations, but many people in places that need them most – those who do not have nearby Citizens Advice centres, law centres or even transport – are denied these opportunities.

- A serious attempt to improve energy efficiency in the country's housing stock would include large-scale insulation projects on a neighbourhood level, beginning with those neighbourhoods where homes are worst, instead of relying on searching out individual homes. This would be far more efficient and cost-effective, more socially inclusive and acceptable, and could provide good local employment in areas where this is in short supply. It would also make a real contribution to climate goals. In many cases this would provide an alternative to demolition and regeneration, would preserve social housing and the communities people depend on, and would prevent more developments that at present often offer very little to local people and do not even meet building standards. Funding for this would need to be made available to local authorities, and could not be solely dependent on utilities.

16 September 2019