

Department for Communities – Consultation on the Warm Healthy Homes Fund – Northern Ireland

Consultation Response from Propertymark

August 2026

Background

1. Propertymark is the UK's leading professional body of property agents, with 19,000 members representing over 12,500 branches. We are member-led with a Board which is made up of practicing agents, and we work closely with our members to set professional standards through regulation, accredited and recognised qualifications, an industry-leading training programme and mandatory Continuing Professional Development.¹

Consultation – overview

2. The Affordable Warmth Scheme was launched in 2014 as the primary tool that the Department for Communities (DfC) has used to reduce fuel poverty, installing 56,000 energy efficiency improvements in over 31,000 homes since it was introduced. In February 2026, the Department for Communities launched the Warm Healthy Homes Strategy 2026-2036 which set out plans to reduce fuel poverty, improve the thermal comfort and increase the energy efficiency of homes in Northern Ireland. The plans include an additional £150m for a new scheme, the Warm Healthy Homes Fund, that aims to be more ambitious than the last. This consultation asks how the scheme should work in practice, with the DfC seeking views on the proposed model to implement energy efficiency measures, particularly for low income households. The Warm Healthy Homes Fund will be available to home owners and tenants in the private rented sector who meet the following criteria:

- They are in receipt of the Personal Allowance of Universal Credit for three consecutive months.
- They are in receipt of Pension Credit.
- Their total household income is equal to or below the National Living Wage - £29,741.40 after tax and national insurance. (Any personal savings over £6,000 will also count as income)

¹ <https://www.propertymark.co.uk/>

- Additional payments including Personal Independence Payments, War Pension Scheme, Clothing Allowance, Winter Fuel Payments and some others (detailed on page 13/14 of the consultation document²) are also excluded.

Propertymark response – summary

3. Propertymark welcomes the opportunity to respond to the DfC's consultation on the Warm Healthy Homes Fund. We agree with the DfC's commitment to reduce fuel poverty and to improve the energy efficiency of homes. Residential households contribute an estimated 26% of total greenhouse gas emissions in the UK³, and improving energy efficiency is one way to reduce these emissions. However, with proposals for setting Minimum Energy Efficiency Standards (MEES) in Northern Ireland still in development, we are concerned that the Warm Healthy Homes Fund may leave many homes without clearly accessible financial support.
4. The average EPC rating in the Private Rented Sector (PRS) in Northern Ireland is 61⁴, this is considerably lower than England and Wales where the average is 67 and 65 respectively⁵. Should the Department for Communities set MEES at Band C for the private rented sector, the scale of the challenge is going to be significantly higher per home than it will be in other parts of the UK. Not only will more homes in Northern Ireland need to make more energy efficiency improvements to meet EPC Band C, the average house price and rent is lower than other parts of the UK. As a result, landlords will have to invest a higher percentage of their property value, income and costs on energy efficiency measures, which will take longer to recoup through their rent payments or having to make additional savings. As a result, we could see a high proportion of landlords exiting the market. A sudden influx of homes being sold without an increase in demand will likely consequently mean that many of these homes will be left empty with no buyers available and no landlords willing to take on the cost of energy efficiency improvements.
5. Considering this, we encourage the DfC to consider the following recommendations to help improve the energy efficiency of as many homes as possible while maintaining existing stock in the private rented sector:

² <https://www.communities-ni.gov.uk/sites/default/files/2026-05/dfc-warm-healthy-homes-fund-consultation.pdf>

³ <https://www.ons.gov.uk/economy/environmentalaccounts/articles/climatechangeinsightsuk/august2022>

⁴ [dfc-energy-rating-of-housing-ni-2023-tables.XLSX](https://www.dfdc.gov.uk/energy-rating-of-housing-ni-2023-tables.XLSX)

⁵ <https://commonslibrary.parliament.uk/research-briefings/cbp-10544/>

- **Consider an additional criteria to access the Fund based on the energy efficiency of the property** – there will be inefficient homes with tenants who don't meet the eligibility criteria to qualify for the Warm Healthy Homes Fund. If the DfC wants to improve the energy efficiency of these homes, they need to be included within the Warm Healthy Homes Fund.
- **Any funding must be open to landlords to apply directly** – in the consultation document, the DfC points out that the uptake of previous schemes by PRS landlords has been low. Under the Affordable Warmth Scheme, tenants had to apply for landlords to access funding, but tenants have little incentive to apply for schemes when their bills are included within rent. Opening funding to landlords rather than tenants improves access to funding for landlords to make energy efficiency improvements.
- **The DfC should consider introducing an additional grant scheme for homes that are particularly inefficient but were not covered by the Warm Healthy Homes Fund** – this will provide landlords more options to access the financial support they need to improve the energy efficiency rating of their properties, especially those that are particularly expensive to meet minimum energy efficiency standards.

Consultation Questions – Propertymark's response

Question 1: Given the limitations of funding, the Department proposes that households in receipt of the Personal Allowance of Universal Credit (for three consecutive periods) and those in receipt of Pension Credit are eligible for assistance. In addition, income under a set threshold will also be used as an eligibility criterion. It proposes that the total household income threshold of the new Warm Healthy Homes Fund should be set at the rate of the National Living Wage which is currently £29,741.40, net of tax and national insurance, and that it should rise annually in line with the National Living Wage. Under this proposal, the Department proposes to exclude disability and health related benefits and allowances and the winter fuel payment from the calculation of household income, as detailed above. Savings over £6k would be included in the calculation of income. Do you agree with this proposal?

6. We disagree that the eligibility for landlords to access to the Warm Healthy Homes Fund for privately rented homes should be the income of the tenant. This is for three reasons. Firstly, this policy measure does not address the barriers to installing energy efficiency improvements, that

being the financial costs to landlords. Most landlords in Northern Ireland only own one or two properties⁶, making it feasible that a tenant does not meet the eligibility criteria for the Fund, but the landlord cannot afford the cost of energy efficiency measures to meet minimum standards so will evict the current tenant to either sell, advertise the property as a short term let or keep the property empty as it rises in value. This will force the tenants out of the property and prevent energy efficiency improvements from being made. Secondly, the threshold prevents empty homes from being applicable for grant funding, as a tenant is required to live at the property in order for an application to the Fund to be made. Having the property be empty may be necessary where the amount of works needed to make it energy efficient would require the tenant to vacate the property. This will be especially important for hard-to-treat houses covered in question 5. Allowing landlords to access the Fund once a tenant moves out can help increase the number of homes that have energy efficiency measures installed despite being the most difficult or expensive to improve. Thirdly, changing the criteria from the tenant's income to the most energy inefficient properties will have a greater impact on the number of improvements made and prevent more properties from selling due to being too expensive to improve.

Question 2: In relation to the income threshold above, the Department proposes that if the applicant to the Warm Healthy Homes Fund is under 60 years of age, they may have a combined household personal savings of £6,000. For every £250 over the savings threshold, £1 per week for each complete £250 will be added to the calculation of your income. If the applicant to the Warm Healthy Homes Fund is 60 years of age or over, they may have a combined personal household savings of £6,000. For every £500 over the savings threshold, £1 per week for each complete £500 will be added to the calculation of your income. Do you agree with this proposal? Yes or No

7. We disagree with this proposal as we do not agree that the income threshold should be the criteria for the private rented sector. However, we have no issues with including savings as part of the calculation of income for homes that are occupied by their owners. We also agree that savings should be considered for the PRS, in the way laid out in question 2, if the Fund continues to use the eligibility criteria based on tenant's income.

⁶ <https://www.cih.org/blogs/housing-in-northern-ireland-a-beginner-s-guide/>

Question 3: Do you agree that the Department should prioritise Warm Healthy Homes Fund applications based on the energy rating of the property? Yes or No.

8. Yes, we agree that the Department should prioritise Warm Healthy Homes Fund applications based on the energy rating of the property. We encourage this for two reasons. Firstly, prioritising properties with lower energy efficiency ratings will benefit tenants in homes that are most likely to have higher energy costs and poor thermal comfort. This will help to maximise the positive impact on reducing energy bills and improving the quality of life for tenants. Secondly, as stated before, properties with lower energy efficiency ratings are going to cost more for landlords to improve. The higher the potential cost to make a property energy efficient, the more likely the landlord is going to sell the property, especially if they do not have access to any funding. Encouraging more landlords to access the Fund will help reduce the impact that MEES will have on the rental market, caused by a large spike in property sales.

Question 4: The Department proposes that Private Rented Sector landlords may access fully funded cavity and loft insulation, draught proofing, and ventilation, provided their tenant meets Warm Healthy Homes Fund eligibility criteria. Do you agree with this proposal? Yes or No

9. We agree with the proposal to allow landlords to access fully funded cavity and loft insulation, draught proofing, and ventilation. All homes require different energy efficiency improvements, there is no one-size-fits-all solution to energy efficiency. Considering this, there are three key benefits when compared to grant programmes that only pay for a small range of measures. Firstly, a wide range of measures that are fully funded enables landlords to choose the measures that are the most effective at improving their property's energy efficiency rating. Secondly, they can choose measures that would be less disruptive to tenants, preventing disputes and cases where tenants refuse access to the property when professionals come to install the measures. Thirdly, including a wide range of measures increases the number of homes that can benefit from the Fund. There are certain kinds of property where some energy efficiency measures are not feasible, for example, works to improve ventilation that require alterations to the property would be more difficult for listed buildings but installing loft insulation would be possible.

Question 4a: Should additional measures be included such as replacement windows, solar photovoltaic (PV) systems and electrical energy (battery) storage? Do you agree with this addition? Yes or No

10. We agree that additional measures such as replacement windows, solar photovoltaic systems and electrical energy storage should be included. For the reasons stated in our response to question 4, providing landlords with more options ensures that landlords can choose the measures that best work for them, disruption for tenants can be limited and more properties would benefit from the Fund.

Question 5: The Department proposes setting a grant limit of £35,000 for the Warm Healthy Homes Fund that will allow for a fabric first, whole house approach including Air Source Heat Pump, solar photovoltaic (PV) systems and electrical energy (battery) storage. This will be increased to £45,000 to support those 'hard-to-treat' properties. Up to £500 will be included within the grant limit for properties that require some general maintenance or remedial works before energy efficiency measures can be installed. It is anticipated that not all properties will require the full grant limit. Do you agree with this proposal? Yes or No

11. Yes, we agree with the grant limit. It is important that hard-to-treat properties can benefit from the Fund, otherwise they risk being left unavailable for renters or left empty. Introducing a "whole house approach" with additional options for replacing heating systems and additional energy storage is also welcome. We are not aware of the number of homes that would require this approach compared to those that just require the list of fully funded options listed in questions 4 and 4a, but this will help to further prevent a loss of private rented housing stock due to landlords being unable to afford energy efficiency improvements.

Question 6: The Department proposes that an applicant may apply only once to the Warm Healthy Homes Fund and that the Home Assessment will determine what support that property would benefit from. Do you agree with this proposal? Yes or No

12. We disagree that applicants may only apply once to the Warm Healthy Homes Fund. We agree that in most circumstances, receiving additional funding would not be beneficial. We do however see three circumstances where being able to apply to the Warm Healthy Homes Fund more than once necessary. Firstly, cases where the application was rejected due to the tenant not meeting

the criteria but whom have since become eligible. This will prevent cases where poor judgment in filing in the application for the first time does not mean that the landlord and tenant would no longer benefit from the Fund, even if they since become eligible for funding. Secondly, cases where the DfC initially had to reject an application for due to prioritising less energy efficient properties, but there is still funding left in the Fund. This will prevent instances where homes can still benefit from the Fund, but landlords cannot apply due to being rejected early in the Fund's lifespan. Thirdly, applicants should be able to reapply, even after they have received funding, if the energy efficiency measures that were installed are dangerous or ineffective. Given the funding available and mass rollout across the country, there is a chance that some firms will be set up, selling ineffective or dangerous energy efficiency products in order to benefit from the increased demand and substantial revenue. We've seen this scenario take place with spray foam insulation⁷, which led to thousands of homeowners paying to remove the product. In these instances, the homes would still need energy efficiency measures to be installed, which we would encourage the Fund to still provide, especially if the measures were installed by an approved contractor.

Question 7: It is proposed that a list of registered contractors would be provided to households to deliver the works identified by the Home Assessment, ensuring ease of access and a streamlined service for applicants. Do you agree with this proposal? Yes or No

13. We agree that a list of registered contractors is necessary to provide ease of access, a streamlined service for applicants and ensure quality control over who can install energy efficiency improvements. Quality control will be essential to prevent cases where some contractors take advantage of the Fund and install fraudulent or ineffective products.
14. The need to use a contractor from an approved list does have one downside, that it reduces the availability of contractors if demand for their services is particularly high. This must be taken into account when introducing MEES, as landlords could have organised energy efficiency improvements that cannot be installed until the legal deadline. In these instances, we would recommend that landlords who have organised energy efficiency improvements should be exempt from MEES if they can demonstrate the measures should be enough for them to meet MEES.

⁷ <https://www.bbc.co.uk/news/articles/cqjrpv218r0o>

Question 8: It is proposed that initially registered Warm Healthy Homes Fund contractors will need to hold the following relevant accreditations and quality standards for the measures that they install:

- Gas Safe (must be gas safe registered to install gas appliances)
- NICEIC (Electrical work)
- British Board of Agrément (BBA) (Loft, cavity wall, solid wall)
- Solid Wall Insulation Guarantee Agency (SWIGA) (Solid wall)
- National Insulation Association (NIA) (Loft, cavity wall)
- Cavity Insulation Guarantee Agency (CIGA) (cavity wall)
- Microgeneration Certification Scheme (MCS) (small-scale renewable energy systems)
- Installation Assurance Authority – (single compliance platform)

As the Warm Healthy Homes Fund matures it is proposed that it will align with the accreditations and standards being used in other government schemes This may mean transitioning to PAS 2030 or PAS 2035 standards or similar. Do you think that industry is ready to adopt or move to the principles of PAS 2030/2035? Yes or No.

15. We neither agree nor disagree. We are not in a position to speak on behalf of contractors or to estimate their ability to transition to different standards.

Question 9: Are there any other alternative standards or accreditations that may be applied to contractors working on all government energy-efficiency schemes? Yes or No.

16. We have no further comments to make at this time.