

DfC Warm Healthy Homes Fund Consultation MAG Response

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General Information

Please indicate if you are replying on behalf of a body or organisation.

MAG Ministerial Advisory Group for Architecture

If you are answering on behalf of a body or organisation, what best describes your interest in this consultation?

Arm's Length Body

Proposal: Eligibility

Question 1. Do you agree with the proposed approach when assessing eligibility for the Warm Healthy Homes fund?

Yes

Please give reasons for your answer:

MAG agrees with the Department's proposed approach to assessing eligibility for the Warm Healthy Homes Fund. Targeting support towards households in receipt of qualifying benefits and those on lower incomes is an appropriate and proportionate means of ensuring that limited public funding is directed towards those most at risk of fuel poverty.

The proposal to disregard certain disability and health-related benefits when calculating household income is also welcomed, recognising that many vulnerable households experience higher energy demands due to health conditions, reduced mobility or the need to maintain higher indoor temperatures.

However, MAG recommends that eligibility should continue to recognise that fuel poverty is influenced by three interconnected factors: household income, energy costs and the energy performance of the dwelling. Whilst income is an important indicator, the condition and performance of the home also have a significant bearing on affordability, health and wellbeing.

The Warm Healthy Homes Fund should therefore retain sufficient flexibility to respond to households whose circumstances may not be fully reflected through income thresholds alone, particularly where poor housing conditions

contribute to excess cold, damp, mould or poor indoor air quality.

Consideration should also be given to households with exceptional health or accessibility needs where improved building performance can deliver wider public health benefits and reduce long-term pressure on health and social care services.

MAG supports the Department's stated ambition to adopt a whole-house, fabric-first approach. Eligibility should therefore be viewed as the gateway to a programme that seeks not simply to install individual energy efficiency measures, but to improve the overall performance, comfort, health, resilience and durability of homes. This performance-led approach aligns with recognised best practice across the UK retrofit sector and provides greater long-term value for both households and the public purse.

Overall, MAG supports the proposed eligibility framework, while encouraging the Department to retain sufficient flexibility to ensure that the scheme reaches those households where the need and potential benefits are greatest.

Proposal: Savings

Question 2. Do you agree with the proposed approach to how household savings are treated when assessing eligibility for the Warm Healthy Homes Fund?

Yes

Please give reasons for your answer:

MAG agrees that household savings should be considered in a proportionate manner when assessing eligibility for the Warm Healthy Homes Fund. It is appropriate that public funding is targeted towards households in greatest need, while recognising that maintaining a modest level of savings is an important aspect of financial resilience.

The proposed £6,000 threshold provides a reasonable starting point and aligns with established approaches used across other government support schemes. The more favourable treatment of savings for older applicants is also welcomed, recognising that many pensioners rely on accumulated savings to meet future care, health and living costs.

However, MAG recommends that the Department ensures that the treatment of savings does not unintentionally discourage prudent financial planning or prevent households from retaining reasonable contingency funds for emergencies, essential repairs or unexpected living expenses. Households should not be placed in the position of having to exhaust modest savings before becoming eligible for support that delivers long-term reductions in energy costs and improvements in health and wellbeing.

The Warm Healthy Homes Fund should also recognise that investment in energy efficiency provides lasting public value. Improving the thermal performance of homes reduces future energy demand, lowers fuel poverty, improves indoor environmental quality, supports healthier living conditions and contributes to Northern Ireland's climate objectives. These wider societal benefits extend beyond the individual household and justify a balanced approach to means testing.

MAG therefore supports the proposed approach to savings, while encouraging the Department to retain discretion to consider exceptional circumstances where rigid application of savings thresholds may prevent vulnerable households from accessing support. A proportionate and flexible approach will help ensure that the Fund reaches those most in need while continuing to encourage responsible financial behaviour and delivering the greatest long-term benefit from public investment.

Proposal: Prioritisation of applications

Question 3. Do you agree that the Department should prioritise Warm Healthy Homes Fund applications based on the energy rating of the property?

No

Please give reasons for your answer:

MAG agrees that the energy performance of a dwelling should be a significant factor in prioritising applications to the Warm Healthy Homes Fund. Homes with poor energy performance are more likely to experience high heating costs, fuel poverty and poor thermal comfort, making EPC ratings an appropriate component of the assessment process.

However, MAG does not support the use of EPC rating as the sole prioritisation criterion. Whilst EPCs provide a useful indication of a property's

theoretical energy performance, they do not fully capture the factors that influence the health, comfort and wellbeing of occupants. They also do not adequately reflect issues such as damp, mould, indoor air quality, overheating risk, ventilation performance, building condition or the specific needs of vulnerable occupants.

The Warm Healthy Homes Fund presents an opportunity to adopt a more holistic, performance-led approach that recognises the relationship between building performance, public health and fuel poverty. Prioritisation should therefore consider both the condition of the dwelling and the vulnerability of the household occupying it.

MAG also notes that EPC assessments are based primarily on modelled performance rather than measured building performance. Whilst they remain an important assessment tool, they should be complemented by a wider consideration of building condition and household circumstances during the home assessment process.

A whole-house assessment undertaken by suitably qualified professionals should identify opportunities to improve building fabric, ventilation, thermal comfort and overall building performance in accordance with recognised retrofit best practice. This approach is consistent with the principles of fabric-first, whole-house retrofit promoted through PAS 2035, the Passivhaus Trust, the AECB CarbonLite Retrofit Standard and LETI guidance.

MAG therefore recommends that EPC ratings should form one important element of the prioritisation process, rather than being the sole determinant of access to support.

If you answered no, do you think that the Department should prioritise applications based on another reason?

Please provide detail:

MAG recommends a balanced prioritisation framework that considers both household vulnerability and building performance, ensuring that funding is directed where it can deliver the greatest social, health and environmental benefit.

In addition to EPC rating, the Department should consider:

- Household income and fuel poverty.
- Health conditions that are exacerbated by cold, damp or poor indoor environmental quality.

- Older people, young children and other vulnerable occupants.
- The presence of damp, condensation, mould or inadequate ventilation.
- The construction type and condition of the dwelling, including hard-to-treat properties.
- The potential for whole-house, fabric-first retrofit to achieve significant and lasting reductions in energy demand.

MAG also recommends that the home assessment extends beyond verification of the EPC rating to include an assessment of moisture risk, ventilation, indoor environmental quality and the suitability of proposed measures. This will help ensure that interventions improve both energy efficiency and occupant health while avoiding unintended consequences.

Adopting a broader prioritisation framework would better align the Warm Healthy Homes Fund with its stated objective of delivering warm, healthy homes. It would also reflect established best practice in whole-house retrofit by recognising that successful outcomes depend on the interaction between the building, its occupants and the measures installed, rather than on energy ratings alone.

Proposal: Private Rented Sector

Question 4. Do you agree with this proposal?

Yes

Should additional measures be included such as replacement windows, solar photovoltaic (PV) systems and electrical energy (battery) storage?

Yes

Please give reasons for your answer:

MAG agrees that eligible tenants living in the Private Rented Sector should have access to support through the Warm Healthy Homes Fund. The Private Rented Sector contains a significant proportion of older, less energy-efficient homes, and tenants are often among those most vulnerable to fuel poverty, poor thermal comfort and adverse health outcomes associated with cold, damp and poorly ventilated housing.

MAG supports the inclusion of cavity wall insulation, loft insulation, draught proofing and appropriate ventilation as core measures. However, these measures should not represent the limit of support where a whole-house assessment identifies additional interventions that would provide greater long-term value.

MAG therefore supports the inclusion of additional measures, including replacement windows where existing windows are beyond reasonable repair or significantly undermine thermal performance, together with solar photovoltaic (PV) systems, battery storage and low-carbon heating technologies where these form part of an appropriate whole-house, fabric-first retrofit strategy.

The Warm Healthy Homes Fund should avoid a measure-led approach in favour of a performance-led approach. Measures should be selected based on the needs of the property and the anticipated improvement in building performance, occupant health and long-term affordability, rather than being restricted by tenure.

The Department should also recognise the evolving regulatory landscape for residential buildings. Improving the energy performance of privately rented homes will assist landlords in meeting future regulatory requirements while improving housing quality, reducing fuel poverty and supporting Northern Ireland's wider climate objectives.

MAG further recommends that any publicly funded improvements remain with the property for the long-term benefit of future tenants and that appropriate safeguards are in place to ensure that public investment is not offset through disproportionate rent increases. This will help ensure that the Warm Healthy Homes Fund delivers lasting social, environmental and economic value.

Proposal: Grant Limits

Question 5. Do you agree with this proposal?

Yes

Please give reasons for your answer:

MAG agrees with the proposed grant limits and welcomes the Department's recognition that meaningful improvements in energy efficiency require a

whole-house, fabric-first approach. The proposed limits of £35,000, increasing to £45,000 for hard-to-treat properties, represent a positive step towards enabling deeper retrofit and are more likely to deliver lasting reductions in fuel poverty, carbon emissions and energy demand than previous measure-led schemes.

MAG particularly welcomes the inclusion of building fabric improvements alongside low-carbon heating, solar photovoltaic systems, battery storage and ventilation, recognising that reducing heat demand should remain the primary objective before considering heating system replacement.

However, MAG recommends that the grant limits should be applied with sufficient flexibility to support both comprehensive retrofit and carefully planned phased retrofit where appropriate. Many traditional, solid wall, non-traditional and occupied dwellings cannot realistically achieve optimum performance through a single intervention. The Department should therefore recognise structured whole-house retrofit plans, such as the EnerPHit Component Method, which allow homes to be upgraded in stages while maintaining a coherent long-term strategy and avoiding poor sequencing or stranded investment.

MAG also recommends reviewing the proposed £500 allowance for maintenance and remedial works. Experience across government-funded retrofit programmes demonstrates that essential enabling works, including repairs to roofs, rainwater goods, damp defects, structural issues and other building defects, frequently exceed this value. Providing greater flexibility for enabling works would improve scheme delivery and reduce the number of properties that cannot proceed despite otherwise meeting the eligibility criteria.

Finally, MAG recommends that funding decisions should continue to be informed by whole-life value rather than lowest capital cost alone. Investment in high-quality building fabric, moisture-safe construction, effective ventilation and robust quality assurance delivers long-term benefits through reduced energy consumption, improved occupant health, increased building durability and lower future maintenance costs. This approach is consistent with recognised best practice, including PAS 2035, Passivhaus EnerPHit, the AECB CarbonLite Retrofit Standard and LETI guidance.

Proposal: Application Limit

Question 6. Do you agree with this proposal?

No

Please give reasons for your answer:

MAG does not agree that applications should be limited to a single opportunity under the Warm Healthy Homes Fund.

Whilst the intention to maximise the reach of available funding is understood, a one-application limit does not reflect the practical realities of delivering high-quality whole-house retrofit, particularly within older, traditionally constructed, solid wall, non-traditional or occupied homes.

Many properties cannot reasonably accommodate all recommended measures during a single programme of works due to technical constraints, occupant circumstances, funding limitations or the natural lifecycle of building components. Best practice increasingly recognises that successful retrofit is often delivered through a planned sequence of interventions rather than a single installation programme.

MAG recommends that the Home Assessment should produce a comprehensive Whole House Retrofit Plan that identifies the optimum long-term pathway for improving building performance. Where all measures cannot be delivered during the initial funding allocation, the Department should retain the flexibility to support future phases where these remain consistent with the agreed retrofit plan and continue to deliver value for money.

This approach is consistent with recognised retrofit frameworks, including PAS 2035, the Passivhaus Trust's EnerPHit Component Method and the AECB CarbonLite Retrofit Standard, all of which recognise the importance of carefully sequenced, performance-led retrofit. Delivering the right measures, in the right order, for the right building reduces the risk of unintended consequences, avoids stranded investment and improves long-term building performance.

MAG also recommends that the Whole House Retrofit Plan remains associated with the property, allowing future improvements to build upon earlier interventions while maintaining a coherent long-term strategy. This would ensure that public investment supports continuous improvement rather

than isolated measures and would better align with the Warm Healthy Homes Fund's objective of delivering warm, healthy and resilient homes.

Accordingly, MAG recommends replacing the one-application limit with a property-based Whole House Retrofit Plan that permits phased delivery where this represents the most appropriate technical solution.

Proposal: Quality Standards

Question 7. Do you agree with this proposal?

Yes

Please give reasons for your answer:

MAG agrees that robust quality standards are fundamental to the success of the Warm Healthy Homes Fund and supports the requirement that contractors are appropriately accredited and competent to undertake the measures they install. Public investment should deliver safe, durable and high-quality retrofit that provides long-term value for householders and the public purse.

However, MAG considers that quality assurance should extend beyond installer accreditation alone. Successful whole-house retrofit depends upon the quality of assessment, design, specification, sequencing, installation, commissioning, verification and occupant handover. The Warm Healthy Homes Fund should therefore adopt a whole-system approach to quality, recognising that building performance is achieved through the interaction of all stages of the retrofit process.

MAG recommends that home assessments are undertaken by suitably qualified professionals with an understanding of building physics, moisture risk, ventilation, thermal bridging and whole-house retrofit principles. Similarly, commissioning of heating and ventilation systems, airtightness testing where appropriate, and clear occupant guidance should form part of the overall quality assurance framework.

The Department's proposal to provide householders with access to a register of approved contractors is welcomed, provided that the register is transparent, regularly monitored and based upon demonstrated technical competence, quality performance and customer satisfaction. Householders

should retain an appropriate degree of informed choice while having confidence that all participating contractors meet consistently high standards.

MAG also recommends that quality assurance should encourage continual improvement and be informed by recognised best practice, including PAS 2035, Passivhaus and EnerPHit principles, the AECB CarbonLite Retrofit Standard and other evidence-based whole-house retrofit methodologies. The objective should not simply be compliance with minimum installation standards, but the delivery of measurable improvements in building performance, occupant health, comfort and long-term durability.

Ultimately, quality should be judged by the performance of the completed home rather than the successful installation of individual measures.

Proposal: Accreditation

Question 8. Do you think that industry is ready to adopt or move to the principles of PAS2030/2035?

Yes

Please give reasons for your answer:

MAG supports the adoption of the principles of PAS 2030 and PAS 2035 and believes that these standards provide an important framework for improving the quality, consistency and consumer protection associated with domestic retrofit. The emphasis on whole-house assessment, risk management, appropriate sequencing of measures and independent retrofit coordination represents a significant advancement over traditional measure-led approaches.

Whilst industry readiness will vary across sectors and regions, the Warm Healthy Homes Fund presents an important opportunity to further develop skills and capacity within Northern Ireland's retrofit supply chain. Successful implementation will require appropriate training, transitional support and investment in professional development to ensure that contractors, designers, assessors and coordinators can consistently deliver high-quality retrofit.

MAG also considers it important to recognise that PAS 2035 primarily establishes the process for delivering retrofit rather than defining the level of building performance that should ultimately be achieved. For this reason, PAS

PAS 2035 should be viewed as complementary to recognised performance-based methodologies, including Passivhaus EnerPHit, the EnerPHit Component Method and the AECB CarbonLite Retrofit Standard. Together these approaches provide both robust retrofit governance and clearly defined building performance objectives.

The Department should therefore encourage a culture of continual improvement, where compliance with PAS 2035 represents the foundation for quality assurance rather than the final objective. The ultimate measure of success should be the performance of the completed home, including reduced energy demand, improved indoor environmental quality, enhanced thermal comfort, moisture resilience and long-term durability.

Question 9. Are there any other alternative standards or accreditations that may be applied to contractors working on government energy efficiency schemes?

Yes

Please provide detail:

MAG recommends that the Department recognises additional standards and professional competencies that support high-quality, performance-led retrofit alongside the proposed accreditation framework.

Whilst PAS 2030 and PAS 2035 provide an appropriate retrofit delivery framework, consideration should also be given to recognising qualifications and competencies associated with high-performance building design and construction, including Passivhaus Designer, Passivhaus Tradesperson, Passivhaus Certifier and recognised training in the EnerPHit Component Method. These qualifications provide specialist expertise in building physics, airtightness, thermal bridge free construction, moisture-safe design, ventilation and quality assurance.

Similarly, the principles contained within the AECB CarbonLite Retrofit Standard and the LETI Climate Emergency Retrofit Guide provide valuable technical guidance that complements PAS 2035 by focusing on measurable improvements in building performance, operational energy demand, occupant health and long-term carbon reduction.

MAG also recommends that accreditation extends beyond installation competence to include commissioning of ventilation and heating systems, airtightness testing where appropriate, moisture risk assessment and post-

installation verification. These activities are fundamental to achieving the intended performance of retrofit measures and ensuring that public investment delivers lasting value.

Ultimately, the Warm Healthy Homes Fund should promote a competence framework that recognises both process quality and building performance. Contractors should not only demonstrate compliance with recognised installation standards but also possess the knowledge and skills required to deliver healthy, low-energy, climate-resilient homes through a whole-house, fabric-first approach.

Proposal: Accreditation

Question 10. Do you think that the proposed aftercare arrangements are sufficient?

No

If you answered no, please provide additional detail on any additional aftercare that the Managing Agent of the Warm Healthy Homes Fund should provide:

MAG does not consider that the proposed aftercare arrangements are sufficient to maximise the long-term benefits of the Warm Healthy Homes Fund.

A follow-up telephone call between six and twelve weeks after installation is a useful first step, but it is unlikely to identify many of the issues that only become apparent during the first heating season or after occupants have had sufficient time to understand and operate new technologies. Successful retrofit depends not only on the quality of installation but also on effective commissioning, occupant understanding and ongoing optimisation of building performance.

MAG recommends that aftercare forms part of a structured post-occupancy support programme. This should include clear homeowner guidance on the operation of heating, ventilation, solar photovoltaic systems and battery storage where installed, together with practical advice on maintaining good indoor environmental quality, controlling moisture and condensation, and operating the home efficiently.

Where appropriate, the Managing Agent should undertake a follow-up review after the first heating season to evaluate system performance, identify any commissioning issues and ensure that the intended energy, comfort and health outcomes are being achieved. This review should also provide an opportunity to gather feedback from occupants and identify lessons that can improve future programme delivery.

MAG also recommends that the Department considers introducing proportionate post-occupancy evaluation across a representative sample of projects. Monitoring energy performance, indoor environmental quality and occupant satisfaction would provide valuable evidence on the effectiveness of the Fund, support continuous improvement and demonstrate the long-term value of public investment.

High-quality retrofit does not conclude when installation is complete. Long-term success depends upon ensuring that buildings perform as intended, that occupants understand how to operate their homes effectively, and that lessons learned are fed back into future programme design. A more comprehensive aftercare strategy will help ensure that the Warm Healthy Homes Fund delivers lasting improvements in energy efficiency, occupant health, comfort and building performance.

Equality Considerations

Question 11. Please comment on any equality implications you feel may arise from the issues/proposals discussed in this consultation:

MAG welcomes the Department's commitment to improving the energy efficiency, affordability and health of homes across Northern Ireland and considers that the Warm Healthy Homes Fund has the potential to deliver significant positive equality outcomes.

Fuel poverty, cold homes and poor housing conditions disproportionately affect many of the groups protected under Section 75 of the Northern Ireland Act 1998, including older people, people with disabilities, families with young children and those on low incomes. Improving the thermal performance, ventilation and overall condition of homes can therefore contribute to reducing health inequalities, improving wellbeing and supporting independent living.

MAG recommends that equality considerations remain integral to both the eligibility and delivery of the Fund. The programme should ensure that households with additional health or accessibility needs are not disadvantaged by rigid eligibility criteria or funding limits. Home assessments should consider the specific needs of occupants, recognising that some households require higher indoor temperatures or specialist adaptations to maintain health and wellbeing.

The Department should also ensure that information relating to the Fund is accessible to all applicants, including those with disabilities, limited digital access or lower levels of literacy. Appropriate communication methods, advice and support should be available throughout the application, installation and aftercare process.

In delivering retrofit measures, consideration should also be given to universal design principles, ensuring that improvements do not inadvertently reduce accessibility or create barriers for older or disabled occupants. Retrofit should support people to remain safely and comfortably in their homes throughout all stages of life.

Finally, MAG recommends that the Department monitors equality outcomes as part of the evaluation of the Warm Healthy Homes Fund. This should include consideration of how the scheme contributes to reducing fuel poverty, improving health outcomes, supporting vulnerable households and ensuring equitable access to high-quality, whole-house retrofit across all communities in Northern Ireland.

By adopting a performance-led, fabric-first and people-centred approach, the Warm Healthy Homes Fund has the opportunity not only to reduce carbon emissions and energy costs, but also to make a meaningful contribution to reducing health inequalities, improving quality of life and creating warmer, healthier and more inclusive homes for everyone.

Dr Barry McCarron, MAG Member