

# Renters' Voice!

Consultation response

Draft Fuel Poverty Strategy Consultation

February 2025



## **1.0 About Renters' Voice**

Renters' Voice is a group for people who rent from a private landlord or through a letting agent in Northern Ireland. Our experience of renting motivates us to create change by campaigning for improvements across the private rental sector:

- we **speak out** to influence public and political discussions;
- we ask to be **involved** in relevant decision making;
- we **empower** other renters to create change.

As well as being a strong voice for renters in NI, we want to embed a culture of tenant participation among decision makers.

Renters' Voice is supported by Housing Rights and funded by the Nationwide Foundation, but our voice is our own.

## **2.0 Fuel Poverty Strategy**

Renters' Voice strongly welcomes the draft Fuel Poverty Strategy as we are delighted to see the government commit to a long-term plan of action to address this crucial issue. Fuel poverty is linked to policies across government and as private renters we are particularly aware of how fuel poverty interacts with housing policy.

We believe low quality housing and outdated fitness standards in the private rented sector significantly contributes to fuel poverty and therefore we are supportive of legislation & initiatives which seek to improve and enforce standards.

Renters' Voice experience and expertise is limited to the private rented sector and as housing campaigners, our primary focus in this strategy is on homes being more energy efficient. Because of this, we have not responded to the full strategy and instead have focused our attention on **Outcome 1, Improved energy efficiency for vulnerable households.**

### **3.0 Improved energy efficiency for vulnerable households**

#### **Objective 1 - Raise and appropriately enforce housing standards**

##### **3.1 What would a readily understandable and measurable definition of “thermal comfort” look like?**

Renters' Voice is **hesitant to define ‘thermal comfort’ as it is a subjective term**, and it is also not associated with a concern for protecting health. Instead, we favour Scotland's approach to measuring ‘a satisfactory heating regime’ using temperature. Renters' Voice believes the government should take guidance from relevant health organisations when deciding on appropriate temperatures. This approach was used in Scotland where the World Health Organization's (WHO) recommendations were followed, meaning indoor temperatures were proposed at between 18 –21'C for non-vulnerable households and 20 – 23'C for vulnerable households<sup>1</sup>.

##### **3.2 For MEES in PRS to effectively alleviate fuel poverty, what information or data do you think would be useful and what barriers would we need to overcome?**

Renters' Voice believes we do not have the correct experience or expertise to answer this specific question.

##### **3.3 Should MEES also be applied to other tenures? Please give reasons for your answer.**

Renters' Voice believes MEES should also apply to social housing as **we want all tenants to have equal access to warm homes, which are cost effective to heat**. In addition, enforcing MEES in both the Social Rented Sector & Private Rented Sector would help the government meet the net zero 2050 target in the Draft Programme for Government, by decarbonising homes and reducing emissions from the residential sector.

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<sup>1</sup> [Chapter 5 Indoor temperatures - A new definition of fuel poverty in Scotland: review of recent evidence - gov.scot](https://www.gov.scot)

3.4 Do you agree that introducing updated fitness standards will contribute to making homes more energy efficient? Please provide reasons for your answer.

#### Strongly Agree

Renters' Voice knows that poorly insulated homes, draughty single-glazed windows & inefficient heating systems make homes uncomfortable and unsafe to live in, as well as add to the financial stress renters are under. **In our Cost-of-living survey (Feb 23), nearly 70% of respondents stated that the efficiency of their heating system made it more difficult for them to afford to heat their privately rented homes.** Indeed, one of our members, who lives alone in a studio flat, received a quarterly electric bill this winter of £754. Our member's usage does not warrant such a high bill, instead the bill is shockingly high because her home is heated by electric radiators, which are costly to run and ineffective when trying to heat a large room, like her studio flat. Even when the heating was on, our member recorded the room temperature at below 18 C.

To align with higher EPC ratings, **Renters' Voice wants legislative change to update the current fitness standards, focusing on what is deemed an adequate provision of heating.** One of our members spent most of 2024 living without heating or hot water due to a broken gas boiler. Despite the landlord persistently delaying the repair, Environmental Health could take no action as the property had working sockets to plug in an electric heater. Renters' Voice strongly believes that electric heaters and electric storage heaters should not be considered to provide, 'a reasonable degree of thermal comfort,' and would argue that, as well as being extremely costly to run, they do not prevent or protect against the growth of mould and the spread of dampness which is prejudicial to health. Therefore, we **want to see all electric heaters and electric storage heaters removed from the current Fitness Standards definition of 'efficient heating'**.

Crucially, to ensure these changes in legislation achieve their purpose, Renters' Voice also calls on the Department for Communities to **prioritise enforcement** of EPC ratings and fitness standards. As we have seen with the continued practice of charging illegal letting fees, that legislation alone does not ensure compliance.

### **Objective 2 – Increase investment in energy efficiency schemes for vulnerable households**

Renters' Voice believes we do not have the correct experience or expertise to answer the specific questions in this section, however we are **strongly supportive of increased investment in energy efficiency schemes for vulnerable households.**

From our experience, financial assistance with heating has not been consistent or long-term, meaning it provides some short-term relief but does not allow us to properly plan or budget. We are also supportive of schemes which would incentivize landlords to carry out the necessary upgrades to their property.

Additionally, Renters' Voice believes a **crucial element of supporting vulnerable households from fuel poverty is the provision of accessible expert energy efficiency advice**. We believe this is particularly important for vulnerable households and landlords. One of our members' winter energy bills was half of what it was this time last year, and **our member attributes some of these savings to energy efficiency advice** she received during the year. Our member was advised to get draught excluders and reflective panels for her radiators and was given other useful energy saving tips. After seeking advice about her low EPC rated home, our member also purchased a dehumidifier, to address some of the dampness coming through an uninsulated ground floor. Our member believes **this advice has not only saved her money but also made her home a safer place to live**.

We believe the same advice should also be targeted at and made available to landlords, who ultimately have control over the heating systems and potential retrofitting that takes place in the property. Our member who is mentioned above, believes her landlord was misinformed when he installed what he believed was the latest in energy saving heating systems. Although the electric heating system may be a greener solution to gas or oil, it is extremely costly to run for the tenant and therefore not energy efficient. **Renters' Voice want to see landlords make the right choice as tenants will directly benefit from this** and so we strongly believe expert energy efficiency advice should be made readily available.

## **4.0 Transparency and Accountability**

### **Lived Experience**

#### **4.1 What is the best way to continue to engage with people experiencing fuel poverty?**

Renters' Voice believes engagement with people experiencing fuel poverty should be meaningful and accessible. **Meaningful engagement occurs when decision makers listen to people with lived experience and there is scope for direct change to take place based on this engagement**. If there is no scope for change to happen, then Renters' Voice believes this engagement to be tokenistic. Accessible engagement

occurs when people of different backgrounds and with different abilities can access the engagement and contribute to the discussion.

Although Renters' Voice responds to public consultations, we do not find them the most meaningful or accessible forms of engagement. For us, reading lengthy documents can be off putting at best and totally inaccessible for some and therefore believe face-to-face engagement (in-person or online), like the focus groups mentioned in the draft strategy, can be a great way to engage with people.

Additionally, **certain vulnerable groups of people are more likely to experience fuel poverty, yet these groups can be often the hardest to reach. Therefore, we feel that it would be good practice to proactively reach out to these specific demographics** and try to encourage engagement. Renters' Voice has experience of engaging with vulnerable renters using this approach and we would be happy to share our learnings on this.

When engaging with experts by experience to develop & implement government policy or services, Renters' Voice believes it is **important and reasonable that people are paid for their time**. We believe this is fair, and we also believe this can encourage more people to get involved.

As mentioned in the draft strategy, fuel poverty significantly impacts people living in the private rented sector and so we feel it is crucial that private renters are engaged with in the development and on-going implementation of this strategy, particularly around Outcome 1, Objective 1 Raise and appropriately enforce housing standards. Renters' Voice would welcome and be open to engagement on this issue.

#### 4.2 Do you agree with the proposal for a Fuel Poverty Advisory Group, if not, can you suggest an alternative proposal?

Renters' Voice agrees with the proposal for a Fuel Poverty Advisory Group with appointed members from a range of government agencies. We strongly believe that Fuel Poverty needs a whole government approach and feel this Advisory Group could bolster accountability and ensure a joined-up approach to addressing fuel poverty.

Renters' Voice members have sat on numerous advisory groups, including the TDS Advisory Group and we see the value in having experts by experience being present at these meetings. People with firsthand experience have expertise in the subject matter as well as bring a unique perspective which cannot be replicated by someone without this experience. Therefore, **we believe that as well as partners from statutory**

**agencies and the Voluntary and Community Sector, people with lived experience of fuel poverty should be involved in this group.**

Renters' Voice is a group of private renters who campaign for reform in the private rented sector. If you would like to get in contact with us or find out more about the group then please get in touch with us:

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# Renters' Voice!

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