

Energy One Stop Shop

Response to Consultation

Key points

- **The one stop shop needs to be able to support housing tenants where they have no control over the fabric of their home**
- **Tenants will need quality, verifiable advice, support and information tailored to their tenure**
- **Social landlords must be included in the service – both as landlords with large numbers of properties, but also as business with premises and fleets**
- **Grant support will be vital for any advice service**

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ABOUT NIFHA

The Northern Ireland Federation of Housing Associations, formed in 1977, is the representative body for Northern Ireland's 20 registered housing associations.

Our members are all not-for-profit organisations. Together, supported by the Department for Communities and the Housing Executive, they provide just under 58,000 social and affordable homes.

Housing associations access private finance to effectively double the number of homes they could build with government housing association grant alone.

Housing associations also deliver high quality care and support to help people stay as independent as possible.

Working in partnership with other organisations, they also invest millions each year in community services and facilities.

Our sector employs more than 3,300 people and manages housing assets worth £4.4 bn.

NIFHA welcomes the opportunity to comment on this consultation on the One Stop Shop Service.

PART 1: SETTING THE CONTEXT

The then Economy Minister, Gordon Lyons has launched a public consultation on the development of an Energy "One Stop Shop".

The commitment to establish this service was included in the Path to Net Zero Energy Strategy, launched by Minister Lyons in December 2021, and formed part of the Energy Strategy Action Plan for 2022.

The one stop-shop aims to work with partners to consolidate information, advice and support for consumers, communities and businesses to enable them to transition to affordable, smart decarbonised solutions for their energy efficiency, power, heat and transport needs.

This consultation includes several options about the purpose and scope of the one stop shop as well as the types of services that it should provide and the implementation roadmap.

The Department for the Economy's is asking us to share our views and evidence about the proposals to help inform the development of this crucial service for consumers and businesses.

Northern Ireland has a range of contact points where consumers, communities and non-domestic consumers are able to receive information, advice and support about energy issues, in particular energy efficiency, renewable energy and net zero products and services.

Other nations, such as Scotland, England, the Republic of Ireland and other countries across the European Union where this information, advice and support service is provided centrally through organisations such as the Sustainable Energy Authority Ireland (SEAI) or Home and Business Energy Scotland.

Having an Energy One Stop Shop to provide impartial information, advice and support could help to overcome the barriers that consumers face in moving to sustainable technologies and may provide a number of benefits and advantages.

Being proposed is the adoption the following high-level principles to underpin the One Stop Shop approach, purpose and scope. These are described and shown in the diagram.



For NIFHA this is a low-risk consultation, but it's important to get our view across that the one stop shop should be able to meet the needs of associations as landlords and also be of value for tenants. NIFHA has an in-house staff member who has been involved in energy one stop shops in the past and for them it is important that tenants can receive advice appropriate to their circumstances – in terms of income and being in a rental property, but also that as landlords ,with the ability to retrofit properties at scale which can quickly help meet local carbon targets, you are able to access information, support and funding appropriate to the needs and scale of your organisations.

PART 2: CONSULTATION QUESTIONS

QUESTION 1 – Do you agree with the Energy One Stop Shop underpinning principles?

Yes

While we agree with the underpinning principles, in the housing association sector, the advice service will need to apply to both the landlord and the tenant – A tailored service for the tenant and the landlord will differ greatly and will need to encompass support for landlords to make physical improvements to dwellings (e.g. retrofitting) and for tenants who will be less empowered to make those physical changes to their home, but will need support and advice on behaviour change, transport and on those elements which they have control over (e.g. purchase of energy efficient white goods). Where housing associations will fit within non-domestic customers will need clarified. As businesses, housing associations will have offices and premises etc. but also over 57,000 dwellings so there is potential for overlap in the services required for housing associations in terms

of their domestic and non-domestic buildings, and also other areas such as transport and modal shift. Will the service be able to fulfil its role in terms of technical expertise when it comes to support and advice on retrofitting when its being done at scale across the sector? We already have a fragmented advice and support network, and it's unclear, given the one stop shops desire to create partnerships, if the fragmentation would continue or whether the service would be a genuine one.

QUESTION 2 – Do you agree with the definitions for each of the proposed principles?

No

As noted above, “service delivery with partners” would suggest that this will not be a truly One Stop Shop. We welcome the tailored services – provided they can meet the needs of landlords and tenants with impartial information, backed up with genuine technical expertise.

QUESTION 3 – Do you agree with the proposed strategic objectives for the Energy One Stop Shop?

Yes

However, NIFHA feels that further clarity on strategic objectives would be welcomed. For example it is unclear on what metrics “affordable” will be judged against. Affordable for a landlord and affordable for a tenant are very different. There is potential risk that in engaging and advising communities, those who can actually effect change within a community (eg. social landlord), may not be able to implement or chose to prioritise the outcomes of the advice that a community may receive. Communities cannot be divorced from decision makers in the process.

Clarity would be welcomed on what scale “tailored support” can be given. Housing associations have a total stock of almost 58,000 homes with the largest having over 13,000 properties to manage. Will the support provided be able to deal effectively with a landlord seeking advice on a large scale – eg retrofitting advice on street by street scale of 100s of properties at a time? And likewise, will it be able to provide specific tailored support to tenants, particularly when they have no control on the fabric of the home they live in.

QUESTION 4 – Do you agree that the Energy One Stop Shop should provide advice, information and support to domestic consumers, micro, small and medium businesses and community energy groups?

Yes

It is unclear whether social landlords and not-for-profit organisations and charities are included in the groups above, but it is imperative that those organisations are able to access support from the service. Invest NI does not cover the activity housing associations are engaged in, so need to be covered by this service. In addition, depending on the number of dwellings they own, they could be deemed as small, medium or large businesses. Clarity on where housing associations would “sit” would be invaluable.

QUESTION 5 – Do you agree that the Energy One Stop Shop should take account of the needs of vulnerable domestic consumers, in particular those with low incomes, of pensionable age, digitally excluded, living with chronic ailment or disability or in rural areas?

Yes

It should not be limited to those groups, and it will be critical that these groups are fully supported and advice and support will need to be tailored to their tenure (private rental, social rental, owner-occupier).

QUESTION 6 – Do you agree with the types of services and support that the Energy One Stop Shop should deliver?

Yes

A range of services and support is necessary to ensure that all households and businesses can avail of support that is tailored to their needs. Behaviour change support will be critical for renters due to the limited impact they can effect on the fabric of their homes – this would work well alongside the non-financial support.

QUESTION 7 – Should the Energy One Stop Shop deliver any other services or activities? If so, list your priorities.

Yes (see ranked order below)

3	Lead in the production of national and sectoral statistics to meet reporting obligations, guide policy and inform investment decisions
	Undertake a programme of energy and behavioural research;
2	Deliver or administer financial support schemes, especially targeted to those who need it most
1	Provide support to businesses and Public Authorities including grants, financial support, energy audits, training, toolkits and kitemark certification;
	Provide support to Sustainable Energy Communities including financial support, support with applications to any Renewable Support Schemes, training and toolkits;
	Support energy education in schools
	Monitor compliance and raise awareness of labelling and eco-design regulations

Financial support schemes are critical to success in the social rented sector. Housing associations are already missing out on a Barnett share (c.3%) of the £3.6bn Westminster Social Housing Decarbonisation fund, which would equate to over £100m of government funding for local decarbonisation projects. Housing associations cannot meet the total funding required to decarbonise their stock without some government intervention.

QUESTION 8 – Do you agree with the proposed initial list of consumer engagement channels for the Energy One Stop Shop?

Yes

Access to web and phone support will be beneficial for tenants. Landlords may find face to face engagement more useful given the potential complexities of deep retrofitting at a large scale,

QUESTION 9 – Do you agree with the proposed approach to refine and improve consumer engagement?

Yes

Continual review of how best to engage the consumer will always be necessary, as there is always a risk of “message fatigue” so updating and improving customer engagement and learning from successes in the process could keep the service fresh and engaging.

QUESTION 10 – Do you agree with the proposal to commence the operation of the Energy One Stop Shop with a Pilot and that it should launch as soon as possible?

Yes

It is critical that work starts sooner rather than later with a range of potential service users to ensure the service is fit for purpose when it ramps up. Early engagement with potential user groups (such as housing associations) would be beneficial to ensure that the service can understand what users would want and expect from a one stop shop. Past experience of running advice services indicated that Northern Ireland customers are always motivated by grants, so grant support to go with the service would see greater benefits than an advice-only service.

QUESTION 11 – Do you agree with the proposed Energy One Stop Shop Implementation Roadmap?

Yes

QUESTION 12 – Do you agree with the proposed services that would be available in Year 1 of the Pilot?

Yes

QUESTION 13 – Do you agree with the proposed additional services that the Energy One Stop Shop Pilot would introduce in Years 2 and 3?

Yes

QUESTION 14 – Do you agree with the proposed services that the Energy One Stop Shop may consider introducing from Year 4 onwards?

Yes

QUESTION 15 – Do you agree with the proposal to create a new brand for the Energy One Stop Shop?

Yes

PART 3: SUGGESTIONS

NIFHA has no further suggestions to provide.

Submitted on behalf of NIFHA by:

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