



**FUTURE HOMES STANDARD CONSULTATION RESPONSE  
END FUEL POVERTY COALITION  
26 March 2024**

We fully back the Future Homes Standard in its aims to prevent new homes from relying on fossil fuel heating or requiring retrofitting to be zero carbon.

This initiative is crucial for addressing fuel poverty and ensuring homes are warm, safe, and affordable.

We support the responses of our members such as the Chartered Institute for Housing (CIH) and also recognise the concerns set out by businesses and other organisations in the “Future Homes and Building Standard (FHS) and Home Energy Model (HEM) consultations” letter sent to the DLUHC and DESNZ Secretaries of States in March 2024.

On some of the specific points raised in the consultation questions.

**New specification priorities**

Priorities for the new specification include minimising capital costs, reducing bills and achieving carbon savings. A comprehensive housing plan that addresses the shortage of affordable housing in England should mean that these goals do not need to be seen as competing. The timeline of the Future Homes Standard allows ample opportunity to initiate this long-term strategy.

Neither of the options in performance specifications are ideal from a fuel poverty perspective and we would encourage the Government to be more ambitious. The public sector equality duty safeguards against standards that disproportionately impact lower-income individuals or those with protected characteristics. Lowering fabric standards would strain the electricity grid, particularly as the electrification of heat, transport, and industry is projected to quadruple electricity demand by 2050.

But, if pushed to answer Question 7, we would prefer Option 1 and we would actively oppose Option 2 which could well make levels and depths of fuel poverty worse, especially for social housing residents.

**Part O Standards**

We endorse extending Part O Standards to homes created through material change of use and the adoption of the Home Energy Model. These homes are often terrible quality, and very hard to keep warm or cool. Tighter standards to tackle both excess heat and excess cold are essential. However, we believe there is a need for clear guidance and support to comply with the new regulations, especially for housing associations and local authorities.

## Advice to homeowners

The CIH analysis about how to communicate to new homeowners about heat pumps is also a warning for the future worth considering. Giving people a booklet on how their heat pump works when they move into a new home, isn't enough to make them actually use their heat pump properly. Considering this issue more will be important, especially for vulnerable groups, such as people with disabilities / long-term illnesses.

## Engagement with stakeholders

A long-term plan for housing must prioritise affordability and sustainability and this will only be achieved through continued collaboration and preparation with a broad range of groups to ensure a successful transition to the Future Homes Standard.

## About the End Fuel Poverty Coalition

The End Fuel Poverty Coalition is a [broad coalition of more than 70 anti-poverty, health, housing and environmental campaigners, charities, local authorities, trade unions and consumer organisations](#). It is also supported by academics, social enterprises and those working on the front line of fighting fuel poverty.

We believe that everybody has the right to a warm, dry home that they can afford to heat and power.

Members of the Coalition include: [Action with Communities in Rural England](#), [ACE Research](#), [Advice for Renters](#), [AgeUK](#), [All Birmingham's Children](#), [Austerity Action Group](#), [Association of Green Councillors](#), [Association of Local Energy Officers](#), [Association for Decentralised Energy](#), [Asthma + Lung UK](#), [Basingstoke & Deane Borough Council](#), [Beat the Cold](#), [Brighton & Hove City Council](#), [Bruton Town Council](#), [Camden Federation of Private Tenants](#), [Child Poverty Action Group](#), [Church Poverty Action](#), [Chartered Institute of Environmental Health](#), [Chartered Institute of Housing](#), [Community Action Northumberland](#), [Centre for Sustainable Energy](#), [Climate Action Network West Midlands](#), [Debt Justice](#), [Disability Poverty Campaign Group](#), [Disability Rights UK](#), [E3G](#), [EBICO](#), [End Child Poverty Coalition](#), [Energy Saving Trust](#), [Energy Cities](#), [Fair Energy Campaign](#), [Epilepsy Action](#), [Fair By Design](#), [Foster Support](#), [Friends of the Earth](#), [Fuel Poverty Action](#), [Fuel Poverty Research Network](#), [Generation Rent](#), [Good Law Project](#), [Greenpeace](#), [Groundwork](#), [Hackney Foodbank](#), [Heat Trust](#), [Home Start Oxford](#), [Independent Age](#), [Inner City Life](#), [Joseph Rowntree Foundation](#), [Lambeth Pensioners Action Group](#), [London Borough of Camden](#), [London Borough of Lewisham](#), [Marie Curie](#), [Mayor of London](#), [Moorland Climate Action](#), [National Pensioners Convention](#), [National Union of Students / Students Organising for Sustainability](#), [NCB](#), [National Energy Action](#), [New Economics Foundation](#), [National Federation of Women's Institutes](#), [Northern Health Services Alliance](#), [Oxford City Council](#), [Positive Money Tower Hamlets](#), [Redcar & Cleveland Council](#), [Repowering London](#), [Retrofit Bruton](#), [Right To Energy Coalition](#), [Rossendale Valley Energy](#), [Ryecroft Community Hub](#), [Save the Children](#), [Sense](#), [Scope](#), [Shaping Our Lives](#), [Social Workers Union](#), [South East London Community Energy](#), [Southwark Group of Tenants Organisations](#), [South West London Law Centres](#), [Stonewater Housing Association](#), [Stop The Squeeze](#), [Uplift](#), [UNISON](#), [Warm & Well North Yorkshire](#), [Warm & Well in Merton](#), [Young Lives vs Cancer](#).

The coordination for the [End Fuel Poverty Coalition](#) is provided by social enterprise [Campaign Collective](#) and the Coalition is also part of the [Warm This Winter](#) campaign. In Scotland we work closely with [Energy Action Scotland](#). In Wales, we work with [Climate Cymru's Warm This Winter](#) activity and in Northern Ireland with the NEA-backed [Fuel Poverty NI coalition](#).

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