



**Martin McCluskey MP,
Minister for Energy Consumers,
Department for Energy Security and Net Zero**

By email

31 January 2026

Dear Martin,

Many thanks for meeting with me on 14th January and for the work you and your Department have done to bring the Warm Homes Plan to publication.

The End Fuel Poverty Coalition welcomes the scale of ambition and the intention to lift households out of fuel poverty. But the success of both the Warm Homes Plan and the English fuel poverty strategy will be judged in people's homes and in their bills.

Too many households have been let down by previous schemes, while millions remain stuck in cold, damp homes and high energy debt. We know that the hard work starts now.

Given households have faced unusually high bills for more than five years, the key test now is pace as well as quality: delivery must accelerate rapidly in 2026 and 2027, while underpinned by a Warm Homes Guarantee.

Below we set out a number of priority areas where the Warm Homes Plan and Fuel Poverty Strategy need greater clarity, stronger commitments, or firmer protections in order to match the recommendations the Coalition has consistently made to the Government.

We would welcome the opportunity to meet with you to discuss some of the overarching themes we raise and with your officials to discuss the details.

Targets, ambition and technology

1. Keep the Plan "fuel poverty first"

Confirm that the primary test of success is progress in ending fuel poverty, with delivery prioritised for people at the highest risks to their health & wellbeing from cold, damp and unaffordable energy, not simply aggregate EPC uplift or numbers of installations.

2. Publish trajectories and timelines

Show how many households are expected to move out of fuel poverty by year to 2030, how many are expected to remain and why (including the "not reasonably practicable" categories), and how the post-2030 framework will close any shortfall. Publish timeline dates for the consultations and implementation dates for outcomes and confirm what protections apply in the meantime (redress, remediation, escalation, compensation).

Publish the planning and network package that makes fast installs possible: permitted development/consents, DNO connection timelines, any role for DNOs in local delivery plans, and how vulnerable households are prioritised.

Publish delivery milestones for 2026–27 and how you will simplify delivery so households see benefits quickly.

Alongside fuel poverty trajectories, publish a forward trajectory for typical fuel bills for low-income households over this Parliament and beyond, including the distributional impact of any infrastructure and system costs passed through to bills. Please also set out how long the claimed bill reductions (such as the £300 figure) are expected to last, for which households, and what policies underpin that reduction beyond a single year.

3. Set out the role for ventilation

The lack of ventilation (usually mechanical) is one of the reasons insulation projects fail and mould builds up. Without acknowledgement of this issue and action on it, projects will continue to fail and the public will lose confidence in the programme.

Warm Homes Guarantee

4. Establish a Warm Homes Guarantee around four key themes: advice, quality, protection and cost.

- a. *Advice.* Every household receiving support gets quality independent advice delivered in a format which is accessible and appropriate for them. Ensure long-term funding for independent, locally rooted expert advice services, with provision for those who are digitally excluded. This must include benefits and income maximisation support, help navigating retrofit and heating choices, support accessing the best tariffs, and practical help completing forms where needed. Advice must not be limited to signposting to installer directories. Households need trusted, accountable handholding, especially where previous schemes have failed. Post installation advice is also needed to ensure households get the most from their new technologies and access the best tariffs.
- b. *Quality.* Every installation is quality assured and based on independent surveys before the installer is paid for the work. This must include a defined timeframe for fixing faults and resolving underperformance. Require mandatory measurement of in-situ performance (including minimum Seasonal Coefficient of Performance (SCOP) levels for heat pump installations) and household outcomes as standard, using a proportionate approach (for example temperature and humidity monitoring, smart meter data where appropriate, and verified resident feedback).
- c. *Protection.* Set out a single, simple consumer journey with clear accountability for quality, complaints and redress, including access to rapid remediation where installations fail. We strongly support tighter oversight of certification and competent person schemes, but households also need a clear route to compensation and repairs when things go wrong.
For private rented sector tenants, this also means a ban on landlords increasing rents after improvements or evicting tenants (also see section 11 below).

- d. *Cost.* A clear, enforceable commitment to lower energy bills and/or increased comfort in home, backed by monitoring and redress.
- 5. Clarify the Warm Homes Agency's single point of accountability for the consumer journey**
- All retrofits should include steps that support decarbonisation and flexible, smart energy use and this should be at the heart of the Agency's mission.
- In terms of advice provision, we need clarity on the Agency's proposed role in devolved nations.
- We know that centralised advice provided through a national online and phone service, as set out in the plan, is far from sufficient to underpin scheme delivery and build consumer trust.
- Independent and locally delivered advice is central to building confidence in the retrofit market. As such, we welcome the recognition by the government of the need to link to existing local retrofit schemes and advice providers, and the commitment to deliver the Warm Homes Fund in partnership with mayors, local authorities and local partners, but more clarity and detail is needed on when and how this will be achieved.
- 6. ECO4 remedial works**
- The ECO4 and SSB Law scandals demonstrate that the Warm Homes Plan should establish a single, clearly defined remediation and redress route for all households impacted by faulty energy efficiency installations, including independent technical assessment, funded remediation and formal protections to prevent residents being left to pursue complex legal or insurance processes. We also need to see restitution to those affected delivered much quicker than currently planned.

Funding

- 7. Publish full funding transparency, including what is genuinely new money**
- Provide a clear public breakdown of the Warm Homes Plan funding envelope showing (a) new investment versus previously announced commitments (b) what is England-only versus UK-wide or devolved (c) how funding aligns with delivery years. This should include clarity on how any "financial transaction" loan funding is accounted for and deployed.
- 8. Protect funding integrity: no substitution or backfilling of pre-existing obligations**
- Confirm that Warm Homes Plan resources will not be used to replace or quietly backfill existing delivery obligations or previously funded programmes, unless this demonstrably delivers additional, measurable outcomes for fuel-poor households (this includes ensuring the £428m Eco4/GBIS remediation fund is used to help victims and not given to energy firms to cover any shortfall in their delivery).
- 9. Finance products**
- Clarify how Consumer Credit Act reform will be used to enable fair green finance products and confirm whether the Government will develop property-linked finance beyond case studies.
- 10. Avoid a Postcode Lottery**
- Clarify how low-income households in areas and nations without access to [Warm Home: Local](#) or [Warm Home: Social](#) grants will receive support after the Energy Company Obligation (ECO) ends in March. This may result in requiring more help to low income households outside initial WH:LG areas and to low income households in

WH:LG areas not due to receive support until later phases of roll-out of area-based schemes.

Confirm with devolved administrations the funding increases due to nation-specific programmes and delivery timescales.

10. Boiler Upgrade Scheme

Allocate a proportion (for example, 30%) of the Boiler Upgrade Scheme to provide fully funded grants for low carbon heating for low income households, alongside advice and support on using new heating systems.

Wider support

11. Avoid shifting policy costs onto gas bills without mitigation for vulnerable households still on gas

We agree that it needs to be cheaper for households to electrify, but we cannot allow a system where vulnerable households suffer as a result of system-level changes. Therefore Ministers should commit that any levy or policy-cost reforms that move costs off electricity will not load them onto gas bills in a way that increases costs for households still reliant on gas heating and cooking. If such moves are investigated, full analysis of distributional impacts should be undertaken and targeted mitigations delivered if required. Any such reforms must be funded through general taxation or other public mechanisms outside the Warm Homes Plan, otherwise it risks penalising the very people the Plan is meant to help.

12. Address electricity pricing, standing charges and discrimination in parallel

Publish a timetable for the next steps on electricity pricing reform and standing charge reform, alongside stronger action to tackle tariff discrimination and barriers faced by households using smart meters, prepayment meters or living with inflexible demand. Without this, electrification will not deliver fair bill reductions at scale. Make sure low income consumers can access and benefit from new flexible and smart tariffs designed to manage demand in energy systems.

Clarify how households on prepayment meters will benefit from solar and batteries, including how savings are credited, how export payments work, and what protections will ensure households are not excluded or forced onto unsuitable metering or tariff arrangements.

13. Interim support while households wait

We welcome the scale of capital investment, but it must be matched by stronger revenue support to help households afford energy day to day, especially while upgrades are rolled out. The Government must strengthen separate affordability measures for people facing high bills now and while they wait for upgrades. That includes progress towards a social tariff, improvements to Warm Home Discount design and delivery, stronger action on energy debt and fairer emergency support during cold snaps.

Private rented sector (England & Wales)

14. Deliver private rented sector standards with enforcement, EPC integrity and tenant protections

Confirm a rapid and concrete timetable for delivery of reforms and enforceable minimum standards for the private rented sector. This should be backed by (a) tenant protections against eviction and unfair rent hikes linked to upgrades (b) a workable enforcement plan for local authorities (c) measures to address EPC accuracy and

fraud, including an accessible route for tenants to challenge incorrect EPCs and for authorities to act on poor-quality assessments.

Commit to reviewing and uprating the PRS cost cap (e.g. in line with inflation, after initial evaluation of the Plan), limiting low-value exemptions, introducing explicit anti-retrofit protections and setting out measures to incentivise landlords to act quickly.

Capacity and workforce

15. Build delivery capacity: local authorities, supply chains and workforce continuity

Set out how you will deliver big increases in the scale and quality of training and prevent a stop-start policy cycle that can harm delivery capacity. That means clear multi-year funding certainty, a practical local authority role in delivery and accountability, and a workforce plan that supports SMEs and local supply chains. We also ask for clarity on how the Warm Homes Agency will work with councils and delivery partners to build trust and drive take-up, including meaningful community engagement and post-installation support.

16. Maintain the workforce continuity through the closure of ECO

We welcome the intention to ensure, through the use of public procurement conditions, that new Warm Homes funding from April 2026 supports the workforce whose livelihoods have been affected by the imminent closure of the Energy Company Obligation (ECO). But these conditions need to be implemented urgently.

17. Recognising community groups

Across the UK, community groups are trusted voices playing an increasingly important role in supporting households to retrofit their homes, reduce energy use, cut carbon emissions and lower their bills. Aside from recognising the role community energy groups can play on shared ownership models for solar, batteries and renewable infrastructure, we are disappointed not to see more support for community groups who want to improve delivery of home energy retrofit in their area. Schemes like [Green Open Homes](#) and [Repowering London](#) have demonstrated how communities can play a fundamental role in building consumer trust and scaling-up local retrofit.

The Coalition stands ready to work constructively with the Government to turn ambition into outcomes that people can feel in warmer homes and lower bills and look forward to discussing these recommendations with you.

Yours sincerely,
Simon Francis, Coordinator
On behalf of the End Fuel Poverty Coalition

About the End Fuel Poverty Coalition

The End Fuel Poverty Coalition is a [broad coalition of more than 100 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: [Act on Energy](#), [Action with Communities in Rural England](#) (ACRE), [Age UK](#), [Anti-Austerity Action Group](#), [Association of Local Energy Officers](#), [Association for Decentralised Energy](#), [Asthma + Lung UK](#), [Basingstoke & Deane Borough Council](#), [Beat the Cold](#), Bruton Town Council, [Camden Federation of Private Tenants](#), [Carers Trust](#), [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](#), Cyngor Gwynedd, [Debt Justice](#), [Disability Poverty Campaign Group](#), [Disability Rights UK](#), [E3G](#), East Durham Trust, EBICO, Energise East Sussex, [Energise Sussex Coast](#), Energy Advice Helpline, Energy Cities, [Epilepsy Action](#), [Exeter Community Energy](#) (ECOE), Fair Energy Campaign, [Fair By Design](#), Fairer Housing, [Fuel Poverty Action](#), Fuel Poverty Research Network, [Generation Rent](#), [Green Alliance](#), [Groundwork](#), Hackney Foodbank, [Heat Trust](#), the [HEET project](#), [Independent Age](#), [Independent Food Aid Network](#), [Inner City Life](#), [Joseph Rowntree Foundation](#), [Lambeth Pensioners Action Group](#), Living Rent, [Local Storytelling Exchange](#), [London Borough of Camden](#), London Borough of Lewisham, [Marches Energy Agency](#), [Marie Curie](#), [Mencap](#), [Mayor of London](#), [MECC Trust](#), MND Association, Moorland Climate Action, [National Pensioners Convention](#), [Students Organising for Sustainability](#), National Children's Bureau, [National Energy Action](#), [New Economics Foundation](#), National Federation of Women's Institutes, [Northern Health Services Alliance](#), [Oxford City Council](#), [Positive Money Tower Hamlets](#), [Plymouth Energy Community](#), Redcar & Cleveland Council, [Repowering London](#), Retrofit Bruton, [Rossendale Valley Energy](#), [Ryecroft Community Hub](#), [Save the Children](#), [Sense](#), [Severn Wye](#), [Scope](#), [Social Workers Union](#), [South Dartmoor Community Energy](#), [South East London Community Energy \(SELCE\)](#), [Southwark Group of Tenants Organisations](#), [South West London Law Centres](#), [Tamar Community Energy](#), [Thinking Works](#), Uplift, [UNISON](#), [Warm & Well in Merton](#), [Winter Warmth Network](#), [Young Lives vs Cancer](#), Village Larder (Cumbria), [361 Energy](#).

The Coalition is also part of the [End Child Poverty Coalition](#), the Essential Services Advisory Network and the [Renters Reform Coalition](#). We work closely with [Energy Action Scotland](#), [NEA Wales](#) and the [Fuel Poverty NI coalition](#). The coordination for the [End Fuel Poverty Coalition](#) is provided by social enterprise [Campaign Collective](#).

Academics involved in the Coalition include those from the Universities of Bangor, Birmingham, Edinburgh, Exeter, Leeds, Leicester, Oxford, Strathclyde, Sussex, Worcester and York.

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