



1 June 2026

Response to Department for Energy Security and Net Zero (DESNZ) call for evidence on the design of the Warm Homes Fund (WHF)

We welcome this call for evidence but are concerned that the scope of the Warm Homes Fund (WHF) is too wide to be delivered at pace within the parliamentary cycle. The fund risks spreading resources too thinly across too many sectors and finance mechanisms. We urge the government to focus the WHF on a smaller number of high-impact interventions.

A central ask of the End Fuel Poverty Coalition is that the Warm Homes Plan, and by extension the Warm Homes Fund, is underpinned by a Warm Homes Guarantee. Too many past energy efficiency schemes have left people living in cold, damp homes despite upgrades, facing disruption without reward, or dealing with poor-quality installations and limited recourse. Public confidence has been damaged, and it will not be rebuilt unless this programme delivers measurable improvements for households, in comfort, health, energy security, and cost.

We set out the Warm Homes Guarantee around four pillars:

- **W: Warmth and wellbeing outcomes.** Homes must be demonstrably warmer, healthier and safer to live in, with outcomes measured in real-world conditions, not just installations signed off on paper. This must include mandatory measurement of in-situ performance, including minimum Seasonal Coefficient of Performance levels for heat pump installations, temperature and humidity monitoring, smart meter data where appropriate, and verified resident feedback.
- **A: Advice you can trust.** Every household receives independent, high-quality advice before and after work is done, delivered in a format accessible to them. This includes support for the digitally excluded, benefits and income maximisation, help navigating retrofit and heating choices, and practical handholding through the process. Advice must not be limited to signposting to installer directories. Post-installation advice is also needed to ensure households get the most from new technologies and access the best tariffs.
- **R: Rights, redress and protection.** Clear accountability, strong consumer protections, and fast routes to remediation when things go wrong, including compensation and repairs. The ECO4 and SSB Law scandals demonstrate that the Warm Homes Plan must establish a single, clearly defined remediation and redress route for all households affected by faulty installations, including independent technical assessment and funded remediation. For renters, this also means protection from rent increases or eviction.
- **M: Measured and fair energy costs.** A clear, enforceable commitment that upgrades will deliver lower bills or improved warmth and comfort for the same or lower spend, backed by monitoring, transparency, and redress where expectations are not met.

A Warm Homes Guarantee would provide certainty to households, accountability in delivery, and confidence to Parliament and the public that this programme will achieve its stated aims. We ask the government to incorporate it into the delivery of the Warm Homes Plan and the design of the Warm Homes Fund.

We also highlight that the absence of ventilation (usually mechanical) is one of the primary reasons insulation projects fail and mould builds up. Ventilation is also a core component in keeping homes cool in the summer. Without explicit acknowledgement of this issue and action on it, retrofit installations will continue to underperform and public confidence will be damaged. Ventilation must be in scope for the WHF.

Question 1: Strategic opportunities, challenges and risks

We broadly support the assessment of strategic opportunities and challenges set out in the consultation, but note that while the questions invite feedback on risks, the consultation document itself provides limited analysis of the risks associated with the proposed options. The most significant risk is that if interest rates are set too high, loans will not be taken up. The evidence on this point is unambiguous. High interest rates were the primary reason for the failure of the Green Deal. We strongly recommend that the government engage with the research literature on the Green Deal's failure before finalising the WHF design.

We also see significant potential in the consultation's acknowledgement of third-party retrofit funding based on wider societal savings and avoided costs. As noted in the 2025 Fuel Poverty Strategy, cold and damp homes cost the NHS hundreds of millions of pounds a year through respiratory and cardiovascular illness, GP visits, hospital admissions, and delayed discharge. Programmes that integrate referral pathways from health and social care professionals with energy advice and home improvements have demonstrated clear potential for health providers, including NHS systems, to invest in retrofit as a preventative intervention.

However, data sharing remains a significant structural barrier to unlocking this funding. Health data is sensitive, and the interpretation of GDPR varies considerably between NHS providers. We urge the government to issue national guidance on GDPR in this context and to share best practice examples of programmes that have successfully navigated these barriers.

Question 2: Factors that limit uptake of green finance

We have serious concerns about directing loan finance at households already in fuel poverty or on low incomes. These households are typically unable to take on further debt for the following reasons:

- They are risk-averse and unwilling to take on additional financial obligations
- Many already carry existing debts and will not take on more
- Poor credit ratings resulting from low income and borrowing history may make them ineligible
- Many are self-disconnecting and rationing heating: theoretical bill savings from retrofit measures will be absorbed by improved comfort rather than generating cash to service debt

Encouraging these households to take on debt risks increasing financial hardship and entrenching the unsafe energy rationing behaviours that fuel poverty charities and advice services work to address. These households need publicly funded grant support, not commercial lending.

We welcome the fact that the WHF includes a £600 million allocation specifically intended for low-income households. However, we are concerned that this allocation will not reach those who need it most if it is delivered through the same financial transactions model as the rest of the fund. The barriers facing fuel-poor households are not simply financial: they include low digital access, poor health, distrust of institutions, language barriers, and complex household circumstances that make standard application and assessment processes unworkable for many. Conventional consumer finance approaches will fail this group for the reasons set out above. But standardised grant mechanisms, without the right outreach, advice, and wraparound support, will also fail to reach the most vulnerable households consistently. A more tailored delivery model is essential for this allocation, one that meets households where they are, invests in trusted intermediaries and locally rooted advice services, and removes the engagement and access barriers that cause the hardest-to-reach households to fall through every previous scheme.

However, there is one specific circumstance in which we would support low-interest or zero-percent loans for low-income households: where a property is in such poor structural condition that it cannot qualify for grant-funded retrofit until remedial repairs are carried out. A targeted offer of zero-percent loans to fund preliminary repairs, enabling households to then access Warm Homes Plan grant funding, would be a proportionate and well-targeted intervention.

We also raise a concern about postcode lottery risk. When ECO ends, low-income households in areas without access to 'Warm Home: Local grants', and those in 'Warm Home: Local' areas not due to receive support until later phases, risk being left without any route to support. The WHF must not become a mechanism that papers over this gap with inappropriate debt products. The government must clarify how all low-income households will be reached, regardless of geography or programme phase.

If loans are to form part of the offer for any low-income households, they must be available at zero-percent interest. We raise a specific concern about the principle that WHF investments should not require subsidy and should return the prevailing gilt rate (currently 4.65% to 4.93% for a 10-year gilt). A fund structured around this principle will not reach fuel-poor households.

Question 5: Overarching aims of the Warm Homes Fund

We support the proposed aims to reduce consumer energy bills and accelerate decarbonisation, and to support the building upgrade supply chain. However, loans and equity investment alone will not achieve these aims for low-income and fuel-poor households outside the social or private rented sector. A blended finance approach that includes grant funding will be essential for this group.

We would also ask the government to confirm that the primary test of success for the WHF, and the Warm Homes Plan more broadly, is progress in ending fuel poverty, with delivery prioritised for people at the highest risk to their health and wellbeing from cold, damp, and unaffordable energy. The fund must not measure success solely through aggregate EPC uplift or numbers of installations.

We also ask the government to commit that any returns generated by the WHF are recycled into further home upgrades rather than returning to general expenditure. Treating the WHF as a revolving fund in aggregate would maximise the long-term impact of the initial public investment and send a clear signal that the fund's purpose is to improve homes, not to generate a return to the Treasury.

Question 6: Technology scope

We broadly agree with the technology scope set out in the consultation. However, not all properties will be suitable for all listed technologies, as acknowledged in the recent consultation on alternative clean heating solutions. The scope of fundable renewable heat measures should be aligned with the findings of that consultation.

Within defined heat network zones, funding for heat network connections should be prioritised over individual heating solutions such as heat pumps, to maximise system-level benefits for consumers and the electricity grid.

Whatever technologies are in scope, the finance offer must be aligned with consumer-facing advice services, and this is where the Warm Homes Guarantee becomes essential.

Households taking on debt to install low-carbon technologies must have access to independent, high-quality advice before committing, and must have clear rights and fast redress if things go wrong. Without this, there is a significant risk of mis-selling. The risk is not theoretical: the car finance mis-selling crisis demonstrated what happens when consumers are encouraged to take on financial products without adequate protection. The WHF must not repeat that pattern.

We also note that the lack of ventilation is a significant reason insulation projects fail and mould builds up. Ventilation measures must be in scope for funded works, and quality assurance processes must include verification that ventilation requirements have been assessed and met.

We urge the government to extend the technology scope to include cooking electrification (also see Q70 below). Home electrification consistently focuses on heating and hot water, but gas hobs are present in more than 50% of UK homes and cooking alone accounts for roughly 2% of total UK carbon emissions. A genuinely whole-home approach to clean energy must include the kitchen.

Question 8: Activities the WHF could support

We strongly support investment in the supply chain and workforce training. Demand for retrofit and the availability of properly trained contractors are inextricably linked. There are not enough skilled or qualified people to carry out high-quality retrofit work across all relevant trades, including heating engineers, joiners, plasterers, retrofit surveyors, and energy assessors.

Previous funding cycles that created short-term demand booms without addressing structural supply-side constraints failed to grow the market sustainably, and damaged consumer confidence when standards suffered as a result. Specific priorities include:

- Continuing professional development and training for builders and SMEs to carry out retrofit work to high standards
- Clear pathways for young people to enter net-zero careers, including work experience, apprenticeships, and aligned qualifications
- Multi-year funding certainty to prevent a stop-start policy cycle that destroys the training and workforce capacity it takes years to build
- Training to enable local and regional delivery bodies to provide high-quality advice on retrofit and low-carbon technologies

We also welcome the intention to use public procurement conditions to support the workforce affected by the closure of ECO. But these conditions need to be implemented urgently. Workforce continuity through the ECO transition is not just a supply chain issue: it

directly determines whether the Warm Homes Plan can accelerate delivery in 2026 and 2027 as required. We have significant concerns about replacing training grants with loans, addressed in more detail under Question 57.

Question 9: Finance landscape barriers and Consumer Credit Act

We note that the government is proposing reform of the Consumer Protection Act and the Consumer Credit Act. We share the concern raised by Citizens Advice that weakening the protections offered by Section 75 of the CCA would undermine consumers' confidence to take up the finance offers set out in this call for evidence. Section 75 makes both the retailer and credit company jointly liable where a product costing between £100 and £30,000 is faulty, does not work, or is not as described. This protection is a significant factor in consumer willingness to take on finance for green home upgrades.

We ask the government to confirm that any CCA reform will be used to enable fair green finance products and will not reduce existing consumer protections. We also ask for clarity on whether the Government intends to develop Property Linked Finance beyond case studies, given the significant regulatory change this would require (see Q17).

Question 12: Groups the WHF should support

We generally agree with the groups identified in the consultation, but reiterate our concern about the breadth of the WHF's scope. The fund cannot design and operationalise credible products for all identified groups within the next two to three years. We strongly urge a tighter initial focus on:

- Owner-occupiers, with priority for those on low incomes and in fuel poverty
- Area-based programmes, convened sub-regionally using blended finance
- Community energy and retrofit projects

Question 13: Supporting owner-occupiers

Low-income owner-occupiers in fuel poverty must be prioritised for grant funding, not loans. For this group, debt-based products are inappropriate.

For owner-occupiers with the means to invest in retrofit but who lack sufficient savings or access to affordable finance, the WHF has genuine potential to unlock demand. The critical success factor is the quality of the customer journey. One-stop shops that provide independent advice, contractor matching, and handholding through the retrofit process are essential to generating and converting demand. Without this infrastructure, even well-designed finance products will underperform.

Experience from schemes such as Retrofit West, established in partnership with the West of England Combined Authority, demonstrates what is possible. Of 300 homeowners surveyed who had engaged with the Retrofit West advice service, 25% had completed an installation, a further 32% had an installation underway, and 18% were actively seeking suppliers, suggesting around 75% of households who engaged with an independent advice service went on to install measures. Finance products linked to such services could meaningfully extend access to households for whom retrofit is currently unaffordable.

We agree that the WHF should take a spatial approach to loans, grants, and heat subsidies, ensuring the right technology is supported in the right location and building type, based on cost, carbon performance and suitability for the property.

Question 16: Loan attributes most valuable to expand the market

The three most important attributes are lower interest rates, stronger consumer protection, and a link to local schemes that provide independent advice and support. There is a clear and underserved gap in the current market: no low-interest, government-backed loans exist for middle-income households who want to retrofit their homes but lack the savings or income to fund measures. This is the group for whom the WHF can make the most immediate and substantial difference.

Alongside product design, the customer journey must be simplified end to end. The Warm Homes Agency has a crucial role here, but we need clarity on how it will work with councils and delivery partners to build trust and drive take-up, including meaningful community engagement and post-installation support. Centralised national online and phone services are insufficient on their own. Independent, locally delivered advice is central to building consumer confidence.

Question 17: Property Linked Finance

We support the use of Property Linked Finance (PLF) as one element of a broader finance offer. Because debt is linked to the property and transfers to any new owner on sale, PLF can reduce the payback anxiety that deters homeowners from financing low-carbon technologies.

However, PLF is not yet deliverable. It would require significant regulatory change and could bypass important protections provided by the Consumer Credit Act. We ask the government to set out a concrete timetable for how and when PLF will be developed beyond case studies, with clear safeguards for consumers built into the regulatory framework from the outset.

Question 21: Private landlords

We support the provision of WHF loans to private landlords to help them meet MEES regulations and the Decent Homes Standard. The regulatory driver is an important factor: loans linked to clear compliance obligations are more likely to be taken up than purely discretionary offers.

However, any finance offer for the private rented sector must be accompanied by tenant protections. Landlords must not be able to pass on the cost of compliance to tenants through rent increases, and tenants must not face eviction linked to upgrades. The Warm Homes Guarantee's rights and redress pillar must apply in the private rented sector as it does elsewhere.

Question 22: Social housing providers / mixed-tenure buildings

We wish to highlight a group that is largely absent from the consultation but represents some of the most challenging retrofit cases in the housing stock: mixed-tenure blocks of flats where social landlords, owner-occupier leaseholders, and private rented leaseholders share a building.

These blocks are extremely difficult to upgrade. Building owners, particularly not-for-profit housing associations, often lack the financing capacity to fund holistic improvements, while many leaseholders already face unaffordable service charges and cannot contribute further. Where buildings also require work on building fabric, fire safety, heat networks, and general decency alongside energy efficiency measures, the financing challenge becomes acute. The result is that some of the least energy-efficient and most poorly maintained buildings in the country remain stuck, with no viable route to improvement under current funding

arrangements.

We would encourage the government to develop a specific WHF offer for mixed-tenure blocks, structured as a low-interest loan to the building owner to finance holistic improvements while keeping leaseholder service charge contributions to a minimum. For this to be feasible, eligibility criteria must focus on achieving whole-building improvements in fabric, heating, safety, and decency rather than on a narrow list of technologies or a financial return threshold. Broader returns, measured in improved health, safety, and energy affordability for residents, must be recognised as legitimate outcomes for public investment.

Question 29: Area-based investment funds

We see considerable scope for area-based initiatives to support WHF aims. Place-based retrofit has distinct advantages over purely demand-led approaches: it enables coordinated supply chain mobilisation, community engagement, and the aggregation of demand that drives down costs and improves installer efficiency.

Local communities working in partnership with local governments have demonstrated genuine capacity to deliver investable plans combining climate, social, and economic benefits rooted in community priorities. Street-based retrofit programmes, treating a whole terrace or neighbourhood as the unit of delivery rather than the individual household, represent some of the most promising models available.

We also see opportunities for place-based projects to integrate heat network connection and gas network disconnection, reducing whole-system costs relative to a business-as-usual approach.

Question 37: Distribution Network Operators

We see potential for Distribution Network Operators (DNOs) to fund the installation of low-carbon technologies in areas where this would be cheaper than physical network reinforcement, or where there is existing headroom to accelerate deployment. DNOs are well placed to identify locations where there is an intersection of network and social benefit. However, DNOs do not have the expertise to coordinate retrofit delivery. This function should sit with local authorities and housing providers. There is also significant risk of duplication with the Warm Homes Agency, depending on the scope of its remit. We would also be concerned that the profit motive lying at the heart of DNOs poses a potential risk that tax-payers money will be taken in profit by these firms. We ask the government to publish clarity on how DNO activity, the Warm Homes Agency and local authority delivery will be coordinated, including the role of DNOs in local delivery plans and connection timelines for vulnerable households.

Question 38: Gas Distribution Networks

We agree that there is significant potential for place-based projects to take an integrated approach to heat network connection and gas network disconnection, with areas identified through heat network zoning and Regional Energy Strategic Plans. A coordinated transition could reduce whole-system energy costs relative to a business-as-usual approach. But we do not see logic in Gas Distribution Networks leading projects primarily intended to encourage heat network connections. GDNs are currently incentivised under RIIO to defend the value of the gas network. Projects of this kind would be better run as partnerships between heat network coordinators, network operators, GDNs, and DNOs. We would welcome further exploration of local authority and community-led ownership models for heat networks.

Question 39: Energy suppliers

We are not minded to support the provision of WHF finance to energy suppliers.

Question 40: Energy as a Service models

Energy as a Service models have potential to help households overcome the high upfront costs of low-carbon technology. However, we have significant concerns about the risks these models currently pose to consumers, in particular:

- Complexity of agreements, including language that is not accessible to all consumers
- Long-term contracts (sometimes up to 20 years) in the context of market volatility and provider insolvency risk
- Lack of consumer protection if circumstances change, such as a move or financial hardship
- Anxiety about having essential warmth infrastructure owned and potentially disconnected by a third party

We do not believe energy-as-a-service models are ready for widespread roll-out without the stronger consumer protections and regulatory oversight called for in the Warm Homes Guarantee. Clear, comparable information on costs and savings, minimum quality and performance standards throughout contract terms, and built-in protections for consumers whose circumstances change are all prerequisites, not optional extras.

Question 45: Loans to enable network connections

We raise serious concerns about the principle of requiring low-income households to take out loans to connect to heat networks. Heat networks are monopoly suppliers with lower consumer protections than the retail energy market. Expecting fuel-poor households to take on debt to access such a service is entirely inappropriate. These households should be offered a free or grant-funded connection as a minimum. Any support mechanism must be tailored to household income.

Question 49: Bulk purchasing

Based on experience of the DESNZ-funded Bristol Heat Pump Ready pilot, we highlight the following lessons for bulk purchasing:

- Smaller contractors are generally reluctant to hold large quantities of materials or equipment, as this affects cash flow and increases storage costs. Working through builders' merchants can address this
- Installer brand loyalty to particular product manufacturers creates friction where bulk purchase agreements are with different suppliers
- There is a floor price below which bulk purchasing savings become marginal, particularly where global demand for heat pumps and solar panels remains high
- Encouraging manufacturers to develop UK supply chains and manufacturing capacity is likely to have greater long-term impact than bulk purchasing

We also flag a specific structural barrier under the current Boiler Upgrade Scheme: installers can only recover the £7,500 subsidy from Ofgem after an installation is complete, but cannot pass this interim cost to customers. This creates a significant cash flow burden that constrains SMEs and micro-installers. We urge reform of this aspect of the scheme as a priority.

We also note that a proportion of the Boiler Upgrade Scheme should be allocated to provide fully funded grants for low-carbon heating for low-income households, alongside advice and

support on using new heating systems. Currently, the scheme disproportionately benefits higher-income households who can afford to contribute to upfront costs.

Question 57: Loans for skills and training

We have significant concerns about using loans rather than grants to fund skills development and training in the retrofit sector. A loan-based approach risks undermining progress made through the Heat Training Grant, which funds training providers to build the infrastructure and capacity needed to run courses. If grant support is replaced by loans, further education colleges and training providers will not take the risk of establishing new provision.

Evidence from the Heat Training Grant mid-scheme review shows that 71% said they would not have completed heat pump installation training if subsidies had not been available. The retrofit sector is overwhelmingly made up of small and micro businesses with no training budgets and full order books of conventional construction work. Replacing grants with loans in this context will not produce more training; it will produce less. Grant funding must be maintained as the primary mechanism for supporting training provision.

Question 62: Investment in heat networks

We strongly support mechanisms and loans that make it easier for individual building owners to connect voluntarily to heat networks. The higher the proportion of buildings connected, the lower system costs will be for all participants.

However, it is inappropriate to require low-income households to take out loans to connect. Grant funding is necessary to enable this group to access heat networks, and any support mechanism must be tailored to household income.

Before the WHF encourages wider connection to heat networks, the government must address the unresolved consumer protection challenges in the sector. After six years of consultation, technical standards remain undefined, there is no compensation scheme for outages, no equivalent to the price cap, and no requirement for full regulatory compliance for several years yet. Households must be able to connect on the basis of full and clear information, and the threat of eviction / loss of lease for social housing sector tenants who fall behind on unaffordable heat bills must be removed.

We also see potential for WHF to provide contingency funding at competitive rates for heat network developers. However, this should be conditional on operators meeting consumer protection standards, which must be first brought into being and then stringently enforced. Here too a "Guarantee" principle must operate.

We also ask the government to consider targeted WHF finance for supported and older people's housing providers. Individual schemes in this sector are typically heated by communal heat networks, meaning providers bear a disproportionate share of the costs associated with heat network decarbonisation and compliance with the Heat Network Technical Assurance Scheme. At the same time, supported housing providers are under severe financial pressure: research by the National Housing Federation found that one in three supported housing providers had to close schemes in 2024 due to rising costs and diminishing funding. Many more face closure in the coming years.

These organisations are among the least able to finance heat network upgrades independently, yet the residents they house, including disabled people, people with mental health conditions, older people, and those who have experienced homelessness or domestic abuse, are among those most exposed to the health consequences of cold, inefficient homes. Targeting WHF finance at supported and older people's housing would

simultaneously reduce energy costs, protect the viability of critical housing provision, and deliver decarbonisation outcomes for some of the most vulnerable households in the country. EFPC members working with older and disabled people would welcome an early conversation with the government about how such a targeted offer could be designed. We also flag serious concerns about the cost and complexity of the Heat Network Technical Assurance Scheme (HNTAS) as a barrier to heat network investment that the WHF alone cannot resolve. The Chartered Institute of Housing has estimated that the total cost of the current HNTAS design to the social housing sector in Great Britain could be between £2.9 billion and £5.7 billion, a figure that dwarfs the current allocation to the Heat Network Efficiency Scheme. It is not realistic to expect the WHF to absorb compliance costs at this scale alongside its other objectives. We urge the government to develop a simplified alternative to HNTAS that delivers better outcomes for households at significantly lower cost, and to provide clarity on how HNTAS, MEES, EPC reform, and the Home Energy Model will interact before asking social landlords to commit to WHF-backed finance for heat network upgrades.

Question 66: Community energy projects and community buildings

Community Energy

Many community energy groups develop both generation and retrofit projects, often using surpluses from generation projects to fund retrofit activity. The skills, relationships, and community trust built through generation projects are directly applicable to retrofit delivery. Community energy groups are often uniquely well placed to deliver place-based retrofit precisely because they are trusted by local residents. Schemes such as Repowering London have demonstrated how communities can play a fundamental role in building consumer trust and scaling up local retrofit.

We see real value in drawing stronger links between the Local Power Plan and the Warm Homes Plan, and in using local community energy capacity to support place-based retrofit delivery. We would advocate for funding community groups to carry out generation, retrofit, and flexibility projects in an integrated way. Community energy groups frequently struggle to secure their first capital loan, and bridging loans to de-risk early-stage projects would be a targeted and valuable intervention.

Question 69: Policy barriers for community energy

To deliver the 8GW community energy target set out in the Local Power Plan, the government must urgently address the sector's core structural barrier: the absence of long-term revenue certainty. Current market arrangements mean most community energy projects remain marginal. The Local Power Plan does not create a simple route to market for the sector, nor does it provide revenue certainty.

Grid access and risk profiles also remain significant barriers. Alongside investment in capacity building, regulatory change is needed to enable local electricity sales, support shared ownership models, and provide long-term revenue certainty without which community energy finance will not be viable at scale.

Question 70: Other potential use cases for the Warm Homes Fund

We wish to use this question to highlight the suggestion made under Question 6 for including cooking electrification within the scope of the Warm Homes Fund.

Cooking electrification is a missing piece of the UK's home decarbonisation strategy. Despite gas hobs being present in more than half of UK homes, cooking has been consistently

overlooked in energy efficiency and electrification policy. The WHF has an opportunity to address this gap directly.

Induction cooking is significantly more efficient than gas. Induction stoves operate at 85-90% energy efficiency compared to around 32% for gas, meaning efficiency gains translate directly into lower running costs. The health case is equally compelling and directly relevant to the fund's objectives. Gas stoves release nitrogen dioxide and benzene both during use and when switched off.

Research from [PSE Healthy Energy and Stanford University](#), including measurement in UK homes specifically, found these pollutants at levels linked to childhood asthma and respiratory disease. [CLASP](#) estimates that indoor air pollution from gas cooking costs the UK £1.4 billion annually in healthcare costs, lost productivity, and disability-adjusted life years.

Low-income households, who are less likely to have adequate ventilation, are disproportionately exposed to these health harms. Supporting cooking electrification through the WHF would directly address this health inequality, consistent with the Warm Homes Guarantee's commitment to warmth and wellbeing outcomes.

The barriers to switching are primarily upfront cost and awareness, both of which a targeted fund could address. Unlike some technologies still at early deployment stage, induction cooking requires no new infrastructure, no planning permission, and no specialist installation beyond a standard electrical connection. The cost and complexity barriers are low relative to the carbon, health, and bill savings on offer.

We would support the WHF funding induction hob replacement as an eligible measure under the low-income allocation, prioritising households with poor ventilation and those with children, given the documented link between gas cooking emissions and childhood asthma. A targeted offer at this group would deliver measurable carbon savings, reduce NHS costs associated with respiratory illness, and lower energy bills, hitting all three of the fund's core objectives simultaneously.

We would welcome the opportunity to work with government and relevant research partners to develop the UK-specific evidence base on per-household carbon savings from cooking electrification, which does not yet exist in peer-reviewed form. Commissioning this research as part of the WHF's evidence-gathering work would strengthen the case for cooking electrification as a mainstream policy measure in future rounds.

Wider support: interim affordability measures

Long-term retrofit investment is essential, but it will take time to reach all households. Some households will need help this winter and in the winters ahead while they wait for upgrades. The WHF must not become a substitute for the revenue support measures that fuel-poor households need now.

The government must strengthen separate affordability measures for people facing high bills, including 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. We also ask the government to 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. If such reforms are investigated, full analysis of distributional impacts must be undertaken and targeted mitigations delivered. Vulnerable households must not be penalised by the transition to cleaner energy.

We also ask the government to address electricity pricing, standing charge reform, and the barriers faced by households on prepayment meters in parallel with the WHF. Without these

reforms, electrification will not deliver fair bill reductions at scale, and the finance products enabled by the WHF will not translate into genuine savings for the households who need them most.

Conclusion

The Warm Homes Fund has real potential to accelerate the decarbonisation of UK homes and reduce the energy bills of millions of households, including those in fuel poverty. But that potential will only be realised if the fund is designed around the needs of the people it is intended to help, rather than the requirements of financial return.

The central lessons are clear: complexity and high interest rates kill uptake. Households in fuel poverty need grants, not debt. Supply chain capacity cannot be conjured by stimulating demand alone. And public confidence, once lost through poor-quality installations and inadequate redress, takes years to rebuild.

We urge the government to focus the WHF on a smaller number of well-designed interventions, delivered through trusted local institutions, with independent advice at the heart of every customer journey and a Warm Homes Guarantee underpinning every installation.

The End Fuel Poverty Coalition and its member organisations stand ready to work with the government to design a fund that genuinely ends the misery of cold homes.

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](#), Citizens Advice Newcastle, [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](#) (ECO), 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](#), [MCS Foundation](#), [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](#), [Possible](#), [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), [Voluntary Organisations Disability Group \(VODG\)](#), [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.

Contact: info@endfuelpoverty.org.uk