

Consultation Response

Phasing out the installation of fossil fuel heating in homes off the gas grid.

Department for Business, Energy and Industrial Strategy (BEIS)

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Contact: david.southgate@ageuk.org.uk

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Age UK
Tavis House
1-6 Tavistock Square
London WC1H 9NA
T 0800 169 80 80 F 020 3033 1000
E policy@ageuk.org.uk
www.ageuk.org.uk

Age UK is a charitable company limited by guarantee and registered in England (registered charity number 1128267 and registered company number 6825798). The registered address is Tavis House 1-6 Tavistock Square, London WC1H 9NA.

About this consultation

The Department for Business, Energy, and Industrial Strategy (BEIS) has put forward proposals for phasing out the installation of fossil fuel heating systems in homes off the gas grid from 2026.

Key points and recommendations

- With 4 million homes in Great Britain without a gas network connection, and half a million of these in fuel poverty, current levels of Government funding remain wholly insufficient to facilitate a fair transition to decarbonised heat.
- The Government's current commitments to improving domestic energy efficiency fall £2 billion short of what was promised in their 2019 General Election Manifesto.
- Correcting this shortfall must include £1.4 billion of missed Home Upgrade Grant (HUG) commitments to ensure off-gas grid older households can access sufficient financial support.
- It is vital that any restrictions on the installation of fossil fuel heating systems do not leave any older household unable to replace their heating system.
- Any hard deadline on phasing out fossil fuel boilers must be well advertised across a variety of both online and offline platforms.
- It is essential that energy efficiency schemes, such as the HUG scheme, include mechanisms for supporting low-income older households who are unable to access their Pension Credit and wider welfare benefit entitlements.
- Sufficient heat pump and energy efficiency installers must be trained to ensure efficient installation and rapid nationwide breakdown coverage.
- Funding for the Fuel Poor Network Extension Scheme (FPNES) should be redirected to the HUG scheme.

About Age UK

Age UK is a national charity that works with a network of partners, including Age Scotland, Age Cymru, Age NI and local Age UKs across England, to help everyone make the most of later life, whatever their circumstances. In the UK, the Charity helps more than seven million older people each year by providing advice and support. It also researches and campaigns on the issues that matter most to older people. Its work focuses on ensuring that older people: have enough money; enjoy life and feel well; receive high quality health and care; are comfortable, safe, and secure at home; and feel valued and able to participate.

Introduction

We welcome the opportunity to respond to this consultation. Age UK agrees in principle with the Government's proposals to phase out the installation of fossil fuel heating in homes off the gas grid. It is important that older people are not locked into using older energy inefficient fossil fuel heating systems as the UK makes the transition to Net Zero. With older consumers paying higher energy costs¹ they stand to gain significantly from improved energy efficiency and new economical heating systems. This is particularly true given recent energy price increases, with some estimates suggesting more than £600 will be added to the average consumer bill from April².

However, in practice the Government have not provided sufficient funding to ensure that off-gas grid households have enough financial support to make the transition to low-carbon alternative heating systems. Nor have they sufficiently funded the necessary energy efficiency measures to make low-temperature heat pumps a viable heating source in energy inefficient homes. The Government must provide this additional funding to facilitate the phase out scheme.

New research for Age UK³ shows that while generally supportive, many people aged 55 & over in the UK are still opposed to replacing fossil fuel boilers with new electric heating systems (20%), while others are undecided (10%) and many have no view on the subject (16%)⁴. This represents a lot of older people who still need persuading of the merits of an electric heating system. Nonetheless, more than half (55%) were in favour of phasing out fossil fuel boilers over time and replacing them with new electric systems; 39% in favour so long as installation costs are similar to new fossil fuel systems and 16% in favour regardless⁵. This demonstrates the importance that cost of electric heat systems will play in whether older people favour them as replacements for fossil fuel boilers.

A core commitment of the Government's Energy Retail Strategy was to ensure that adequate consumer protections are in place to support people unable to meaningfully engage with the energy market, and to help them bear the costs of the transition to net-zero⁶. We strongly reinforce the need for the Government to set a higher ambition for energy efficiency and heat pump funding if it is to maximise access and take-up and ensure that all low-income and fuel poor households off the gas-grid can afford low-carbon heating systems. Alongside direct financial support for low-income households the Government must consider incentives for wider households. These could include tax incentives and VAT exemptions.

The half a million fuel poor homes off the gas grid endure a higher fuel poverty rate – 43% more – than do on-grid homes⁷. Their average fuel poverty gap is three times greater than those with a gas connection⁸. The Heat and Building Strategy fell short of 2019 Conservative Manifesto pledges by around £2 billion, of this shortfall, the vast majority (£1.4 billion) was committed to off gas grid homes via the Home Upgrade Grant (HUG)⁹. It is essential the Government provide comprehensive financial support to these households.

The Government's Net Zero proposals also rely heavily on the mass installation of heat pumps as replacements for fossil fuel systems. Some estimates suggest that at least £4.15 billion of additional public funding would be required just to support heat pump

installations over this Parliament¹⁰. The Heat and Building Strategy's £450 million for the Boiler Upgrade Scheme (BUS) is sufficient to fund just 90,000 heat pump grants worth £5,000 over the next 3 years¹¹. Present air source heat pump installation costs for off-gas grid households exceed £12,000¹². While we welcome funding provided for the HUG scheme this money is rightly allocated to a range of measures designed to improve energy efficiency and decarbonise heating systems¹³. This makes it impractical to assess how much of the HUG budget will be spent on heat pumps or suitable alternatives and existing Government commitments to the Scheme still fall short of 2019 Manifesto pledges. This means that there remains a substantial disconnect between the Government's proposed heat pump first approach and the costly reality for older off-gas grid households who lack sufficient financial support to transition from their fossil fuel heating system.

Support for consumers

With significant costs and a lack of funding, low-income off-gas grid consumers are likely to face substantial barriers and competition for accessing the limited Government support available. Funding levels which reflect the ambition of the Government's rhetoric are needed to improve energy efficiency and access to heat pumps. Crucially, this will ensure that low-income older households off the gas-grid will be able to maintain access to sufficient heating.

The Government must commit to increasing funding for the necessary energy efficiency measures to make non-fossil fuel heating systems viable while also making sufficient funding available for the new low-carbon heating systems themselves. Existing funding for low-income and fuel poor households must be increased and extended if the 2026 deadline for the phase out scheme is to be viable.

At a minimum the Government will need to provide the additional £2 billion of heating and energy efficiency spending it committed to in its 2019 Manifesto, including the missing £1.4 billion for the HUG scheme. Separate estimates suggest £12 billion of additional spending will be needed to meet statutory fuel poverty obligations by 2030¹⁴ and the Government should consider this longer-term call as well. This money is required to truly address the lack of support for energy efficiency and improved heating systems, particularly amongst low-income and fuel poor households. This analysis was also undertaken before the impact of current increases in energy costs and wider inflation rises – so this is likely to be an underestimate of the amount required.

The Government must also endeavour to ensure that any new funding is also distributed to households who are not able to access their welfare benefits entitlement. We strongly reinforce the need to support the nearly 1 million older people entitled to Pension Credit who do not claim the benefit¹⁵.

The Government will also need to rethink the Fuel Poor Network Extension Scheme (FPNES). We recommend that the Government consider redirecting FPNES funding to the HUG scheme. This will allow the Scheme to support wider Net Zero goals while improving the situation for fuel poor older households off the gas grid.

Ensuring older households can replace fossil fuel systems

Beyond inadequate funding, it is vital that any restrictions on the installation of fossil fuel heating systems do not leave any older household unable to replace their heating system. Ultimate priority must always be given to households maintaining access to sufficient heating to cover their needs. This is particularly important for older consumers as they often spend longer at home and are more likely to live with health conditions which require more heating or energy use¹⁶. We therefore welcome a degree of flexibility in the choice of replacement heating systems permitted under these proposals.

Any hard deadline on phasing out fossil fuel boilers must also be well advertised across a variety of both online and offline platforms to give older consumers sufficient notice of any change in permitted heating systems. It is vital that the phase out scheme does not come as a shock to any older household, including those who are digitally excluded. BEIS must also avoid implementation issues with installations during the colder months, as initial installation issues could leave older consumers without access to a heating system during colder periods. As a result, it is crucial that any phase out deadline is enacted from April or early in the summer.

Priming the heat pump industry

The Government will also need to consider the installation and maintenance capacity of the UK's heat pump industry. The UK suffers from a lack of sufficient energy efficiency installers, with the Government recognising it as a barrier to its decarbonisation goals¹⁷. Increased numbers of F-gas certified installers working in the heat pump sector will also be required¹⁸ to meet the Government's heat pump goals.

Age UK often receives requests to our Advice Line from older people who have experienced gas boiler breakdowns during the winter months and have been told they may have to wait a week or more for repairs. If the Government brings in an off-gas grid fossil fuel heating system phase out deadline of 2026, it will need to ensure that enough heat pump and energy efficiency installers have been trained to enable efficient installation of heat pumps and the necessary energy efficiency measures to facilitate them. This will also require enough contractors are trained to repair and maintain heat pump systems to allow for speedy nationwide breakdown coverage.

Question 1: Do you agree with the principle of working with the natural boiler replacement cycle as the key trigger to deploy low carbon heat? Please provide evidence to support your response.

We agree in principle with this approach, but any installation phase out should be subject to sufficient financial support being available to ensure low-income and fuel poor households off the gas grid can access the low carbon heating systems and energy efficiency measures required. Any installation phase out must be matched by ambitious, comprehensive Government support to ensure that no off-gas grid household is unable to

afford approved replacement heating systems. We outline what funding is required in our response to question two and three.

Question 2: Would a 2026 end date for the installation of fossil fuel heating in homes off the gas grid give industry and consumers sufficient time to prepare for the regulations? Please provide evidence to support your response.

If the Government follows through with plans to end the installation of fossil fuel heating in homes off the gas grid from 2026 it must ensure that households, particularly those that are low-income and fuel poor, are able to access sufficient Government support to make the transition to heat pumps and other low-carbon heating systems. Without this support in place there is substantial risk that some consumers will be unable to afford the installation of new measures or necessary energy efficiency upgrades. With the fuel poverty rate 43% higher and average fuel poverty gap three times greater for those off-grid than those with a gas connection¹⁹, it is essential the Government provide comprehensive support to ensure these households can replace existing fossil fuel systems and maintain access to sufficient heating.

Older consumers often spend longer at home and are more likely to live with health conditions which require more heating or energy use²⁰. It is therefore vital that any restrictions on the installation of fossil fuel heating systems do not leave any older household unable to replace their heating system due to unaffordable costs. Ultimate priority must always be given to ensuring an older household can maintain access to sufficient heating for their needs, even if this requires a degree of flexibility in terms of the heating systems which are permitted under these proposals.

Low-income and fuel poor older consumers off the gas grid will struggle to make the transition from fossil fuel heating systems without better financial support and improved access to existing schemes. Affordability of heat pumps, or appropriate alternatives, will be crucial. The Heat and Building Strategy's £450million for the BUS is sufficient to fund just 90,000 heat pump grants worth £5,000 over the next 3 years²¹. Estimates suggest that at least £4.15 billion of additional public funding is required to support heat pump installations over this Parliament alone²². Present air source heat pump installation costs for off gas grid households exceed £12,000²³. HUG funding is allocated to a range of measures designed to improve energy efficiency and decarbonise heating systems²⁴, which means it is unclear how much will be spent directly on heat pumps or suitable alternatives.

While the Government committed to £9.2 billion of household energy efficiency and heating funding in their 2019 Manifesto, the actual sum provided fell £2 billion short of this - of which the vast majority (£1.4billion) was committed to off gas grid homes through the HUG scheme²⁵. This compounds the issues faced by off-gas grid households in installing energy efficiency measures and low-carbon heating systems.

Due to significant costs and a lack of funding, low-income off-gas grid consumers are likely to face significant barriers and competition for accessing the limited Government support available. BEIS must commit to increasing funding for the necessary energy efficiency

measures to make non-fossil fuel heating systems viable while also making sufficient funding available for the new low-carbon heating systems themselves. Existing funding for low-income and fuel poor households must therefore be increased if the 2026 phase out deadline is to be viable.

Beyond household funding the Government will also need to expedite the training and upskilling of heat pump and energy efficiency installers. The UK suffers from a lack of energy efficiency installers, with the Government recognising it as a barrier to its decarbonisation goals²⁶. Improved energy efficiency will be essential to realising the goals of the phase out scheme's 'heat pump first' approach to providing heating in off-gas grid homes. Increased numbers of F-gas certified installers working in the heat pump sector will also be required²⁷. Age UK is particularly concerned that without sufficient nationwide coverage of heat pump installers some older consumers could be left with lengthy delays in having their heat pump system repaired. The Government must ensure that it trains sufficient installers before the 2026 fossil fuel phase out deadline so that consumers can replace their systems, confident in the knowledge that they will have sufficient breakdown coverage – particularly during the colder months.

Question 3: Do you agree with a heat pump first approach to replacement heating systems in fossil fuel heated homes off the gas grid that can reasonably practicably accommodate a heat pump? Please provide evidence to support your response.

We encourage flexibility in terms of the heating systems supported in low-income households off the gas-grid. Sufficient funding and support must be made available for low-income and fuel poor older people to access and install heat pumps or alternative heating systems. The missing £1.4 billion for HUG²⁸ must be provided as a matter of urgency as this will specifically support off-gas grid homes.

If the Government pursues a 'heat pump first' approach it will need to ensure that its ambition is met with sufficient funding. Estimates suggest that £4.15 billion of additional public funding is required to support heat pump installations over this Parliament²⁹, but a broader commitment of £9.75 billion³⁰ would be needed to ensure that more homes can be properly retrofitted with energy efficiency measures to support heat pump installations.

Question 6: Do you agree that the performance of replacement heating systems in homes off the gas grid that cannot reasonably practicably accommodate a heat pump should reflect the current high standards of performance that can be delivered through high temperature heat pumps and solid biomass systems? Please provide evidence to support your answer.

We agree with this approach but reinforce the need for flexibility in some cases. Ultimate priority must always be given to ensuring a household can maintain access to sufficient heating for their needs.

Question 7: Do you agree that future use of solid biomass to decarbonise heat in homes off the gas grid should be limited to rural, off-gas grid areas where air quality can be better controlled, and in ‘hard to treat’ properties that are not suitable for other low carbon heating technologies? Please provide evidence to support your response.

We agree with this approach, subject to the need for flexibility as outlined in our response to question six.

Question 12: Do you have any views on what more could be done to address financial barriers to heat pump deployment? Please provide evidence to support your answer.

There are two significant financial barriers we wish to highlight. The Government will need to address these in order to ensure low-income older people who are off the gas-grid can install heat pumps.

The first is the lack of sufficient public funding. Present heat pump funding is insufficient to meet the potential scale of demand from low-income and fuel poor households both on and off the gas-grid. Latest estimates suggest that there are 4 million households in Great Britain not connected to the gas network, representing 14% of households³¹. At least £4.15 billion of additional public funding is required to support heat pump installations over this Parliament alone³². While the HUG scheme will provide support directly to homes off the gas-grid its funding is dispersed across energy efficiency and low-carbon heating installations. This means it is not possible to assess if the scheme’s funding will be sufficient to cover heat pump installation costs for all off gas-grid low-income households.

If the Government pursues a ‘heat pump first’ approach it will need to ensure that it sets a higher ambition for funding heat pumps and the necessary energy efficiency installations to facilitate them. This would be required to maximise access and take-up as well as ensure that all low-income and fuel poor households off the gas-grid can afford low-carbon alternative heating systems. Missed 2019 Conservative Manifesto pledges of around £2 billion for household heating and energy efficiency will need to be provided, particularly the £1.4 billion committed to off gas grid homes via the HUG scheme³³.

Secondly, it is essential that existing schemes support low-income households who are unable to access their welfare benefits entitlement. Around 37% of those entitled to Pension Credit do not claim the benefit, representing nearly a million older people³⁴. The Government have rightly ensured that the HUG scheme will primarily support low-income consumers³⁵. But existing schemes, such as the Energy Company Obligation and Warm Home Discount, have often used access to benefits as a proxy for identifying low-income consumers. While this can be a useful proxy for low-income it can exclude households who are unable to access the benefits system. If the Government pursue a similar targeting mechanism for the HUG scheme, or other decarbonisation schemes, then it must ensure that it includes mechanisms for supporting the 1 million older people who do not access their Pension Credit entitlement, as well as households facing similar barriers to

accessing other benefits. Ensuring low-income households both on and off the benefits system can access alternatives to fossil fuel heating systems is an essential precondition of ensuring that any phase out of fossil fuel boilers is fair and accessible.

Question 16: Do you have any views on what more could be done to ensure households, and communities, affected by our proposals experience a smooth transition to clean heat? Please provide evidence to support your answer.

Any hard deadline on phasing out fossil fuel boilers must be well advertised across a variety of platforms, especially those that directly target affected consumers. Without this the Government risks alienating large numbers of households who may remain unaware that they cannot replace their fossil fuel heating system with a new fossil fuel unit after the 2026 deadline.

For older consumers an important part of this is ensuring that the phase out scheme is promoted via a range of online and offline formats. With two fifths (42%) of those aged 75+ not using the internet at all³⁶ and significant evidence of reduced energy market engagement amongst digitally excluded households³⁷ it is essential the Government address any gaps in their promotion of the phase out scheme.

A crucial aspect of this is ensuring a broad range of sources are used to highlight the phase out, including print media, mail drops, and community and voluntary organisations. BEIS must consider methods of comprehensively promoting the phase out scheme to the most affected consumers. For example, this could include promoting it in publications targeted at consumers using solid fuel or liquified petroleum gas heating systems.

BEIS must also consider wider consumer communication requirements, for example where there is a language barrier or a consumer has a relevant disability or long-term health condition (e.g. a visual impairment).

Question 17: Do you have any further comments to make on our proposals to phase out high-carbon fossil fuel heating in homes off the gas grid? Please provide evidence to support your answer

Ofgem remains committed to extending gas network connections to off-gas grid fuel poor homes through the Fuel Poor Network Extension Scheme (FPNES). FPNES is delivered through the Gas Network Distribution Networks, working with Ofgem and wider partners³⁸. The Government and Ofgem should consider whether funding for FPNES should be redirected to HUG.

We wish to make it clear that we are not calling for fuel poor homes to be excluded from a gas network connection. We have reinforced the need for flexibility in terms of the heating systems which are installed in older people's homes. Proposals for the new Energy Company Obligation (ECO4) suggested restricting gas first-time central heating to households already connected to the gas grid. While in principle we agree that low carbon

alternatives to gas and fossil fuel systems should be prioritised wherever feasible, our response to ECO4 reflected the need for flexibility³⁹. It is key that households maintain access to sufficient heating for their needs and this at times requires a degree of flexibility in terms of the heating system provided.

Nevertheless, we recognise that there is an opportunity for the Government and Ofgem to refocus FPNES towards supporting fuel poor households to access low-carbon alternatives to gas heating systems and to install the necessary household energy efficiency measures to facilitate a fabric first approach. We would therefore encourage a review of whether FPNES funding could be redirected to the HUG scheme.

¹ BEIS, 2021. Annual Fuel Poverty Statistics in England, 2021 (2019 data). Department for Business, Energy and Industrial Strategy. [Online]. Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/966509/Annual_Fuel_Poverty_Statistics_LILEE_Report_2021_2019_data_.pdf. [Accessed 05/08/21].

² Resolution Foundation, 2021. 2022 set to be the ‘year of the squeeze’ as wages stall and families face a £1,200 hit from next April as energy bills and taxes rise. Resolution Foundation. [Online]. Available at: <https://www.resolutionfoundation.org/press-releases/2022-set-to-be-the-year-of-the-squeeze-as-wages-stall-and-families-face-a-1200-hit-from-next-april-as-energy-bills-and-taxes-rise/>. [Accessed 04/01/22].

³ Online survey conducted by Opinium on behalf of Age UK between 3rd and 8th December 2021. Sample of 2,000 UK adults (18+), weighted to be nationally representative of age, gender, region and social grade.

⁴ Online survey conducted by Opinium on behalf of Age UK between 3rd and 8th December 2021. Sample of 2,000 UK adults (18+), weighted to be nationally representative of age, gender, region and social grade.

⁵ The question asked in the survey was: ‘The majority of UK homes currently have a fossil fuel boiler (i.e. gas, oil, LPG) to heat water. Fossil fuels produce carbon dioxide. Which of the following best describes your views on phasing out fossil fuel boilers over time, and replacing them with new electric heating systems as a way to help reduce the UK’s carbon dioxide emissions?’ with the following answer categories:

- In favour of phasing out fossil fuel boilers
- In favour of phasing out fossil fuel boilers – as long as the cost of installation is similar to a new fossil fuel boiler
- Against phasing out fossil fuel boilers

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- N/A – I don't have an opinion on this issue
 - Don't know

⁶BEIS, 2021. Energy Retail Market Strategy for the 2020s. Department for Business, Energy and Industrial Strategy. [Online]. Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005307/energy-retail-strategy.pdf. [Accessed 14/10/21].

⁷ BEIS, 2021. Annual Fuel Poverty Statistics in England, 2021 (2019 data). Department for Business, Energy and Industrial Strategy. [Online]. Available at: <https://www.gov.uk/government/statistics/fuel-poverty-detailed-tables-2021>. [Accessed 03/11/21].

⁸ BEIS, 2021. Annual Fuel Poverty Statistics in England, 2021 (2019 data). Department for Business, Energy and Industrial Strategy. [Online]. Available at: <https://www.gov.uk/government/statistics/fuel-poverty-detailed-tables-2021>. [Accessed 03/11/21].

⁹ EEIG, 2021. Still Waiting for the Green Light. Energy Efficiency Infrastructure Group. [Online]. Available at: https://www.theeeig.co.uk/media/1114/eeig_analysis-of-the-heat-and-buildings-strategy_03.pdf. [Accessed 24/11/21]. Pg2.

¹⁰ E3G, 2021. Three key takeaways from the Heat & Buildings Strategy. E3G. [Online]. Available at: <https://www.e3g.org/news/three-key-takeaways-heat-buildings-strategy-uk-net-zero-cop26/>. [Accessed 08/11/21].

¹¹ Agility ECO, 2021. *Briefing on the Heat & Buildings Strategy*. Agility ECO. [Online]. Available at: <https://www.agilityeco.co.uk/news/briefing-heat-buildings-strategy>. [Accessed 08/11/21].

¹²BEIS, 2021. Phasing out the installation of fossil fuel heating in homes off the gas grid. Department for Business, Energy, and Industrial Strategy. [Online]. Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1026356/domestic-offgg-consultation.pdf. [Accessed 08/11/21].

¹³ BEIS, 2021. Heat and Buildings Strategy. Department for Business, Energy and Industrial Strategy. [Online].

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1026507/heat-buildings-strategy.pdf. [Accessed 08/11/21]. Page 141.

¹⁴ Agility ECO, 2021. The Government's 2030 Fuel Poverty Target in England: Are we on Track? Agility ECO. [Online]. Available at: <https://agilityeco.co.uk/news/funding-meet-fuel-poverty-target-short-%C2%A318bn>. [Accessed 24/11/21]. Pg6. Note: This research was conducted prior to the Heat & Building Strategy being released, but its figures had already accounted for many of the 2019 Conservative Manifesto pledges which were later revealed in the Strategy.

¹⁵ DWP, 2020. *Income-related benefits: estimates of take-up: financial year 2018 to 2019*. Department for Work and Pensions. [Online]. Available at: <https://www.gov.uk/government/statistics/income-related-benefits-estimates-of-take-up-financial-year-2018-to-2019>. [Accessed 15/11/21].

¹⁶ BEIS, 2021. Annual Fuel Poverty Statistics in England, 2021 (2019 data). Department for Business, Energy and Industrial Strategy. [Online]. Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/966509/Annual_Fuel_Poverty_Statistics_LILEE_Report_2021_2019_data.pdf [Accessed 05/08/21].

¹⁷ BEIS, 2021. Heat and Building Strategy. Department for Business, Energy and Industrial Strategy. [Online]. Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1036226/E02666137_CP_388_Heat_and_Buildings_Accessible.pdf. [Accessed 26/11/21]. Pg41.

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¹⁹ BEIS, 2021. Annual Fuel Poverty Statistics in England, 2021 (2019 data). Department for Business, Energy and Industrial Strategy. [Online]. Available at: <https://www.gov.uk/government/statistics/fuel-poverty-detailed-tables-2021>. [Accessed 03/11/21].

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