



# Environmental Pillar

WORKING FOR A SUSTAINABLE FUTURE



**Environmental Pillar submission to  
Affordable Energy Consultation  
27 February 2015**

## ***Fuel Poverty***

Ultimately fuel poverty is a question of the thermal efficiency of housing. In a market, generally the most inefficient housing will be occupied by those with the least purchasing power; whether as house-owners or as tenants. This is the case in Ireland. Therefore eliminating fuel poverty will require the thermal upgrade of the vast bulk of the current housing stock. Analysis of the requirements of greenhouse gas emissions (GHG) mitigation and of long-term economic value demonstrates this needs to be a deep retrofit.

Government policy at the moment provides support:

- For deep retrofit of private accommodation occupied by people with the means to make a financial investment themselves
- For shallow retrofit of private accommodation occupied by owners on low incomes
- For shallow retrofit of local authority accommodation (except in the comparatively rare circumstances where the only practical wall insulation is external insulation.)

Unfortunately at the current rate of energy retrofit, it will take many decades before the entire housing stock is renovated. Uptake rates for the deep retrofit grants have fallen off due to cuts in the grant rates at the same time as recession reduced the capacity of many house owners to invest.

Current policy fails to adequately address the needs of those who do not have the capital to invest in deep retrofit.

It fails entirely to address the situation of tenants in private rented accommodation. (Incidentally, failing to ensure the quality of private rented accommodation puts extra pressure on local authority housing lists.)

The Department of Communications, Energy and Natural Resources (DCENR) for many years declared its intention to institute a 'pay as you save' scheme to finance thermal retrofit throughout the housing stock. Within the last year, mention of this scheme has been dropped from DCENR publications. In this consultation document, it appears only in the glossary, leading us to wonder whether a section referring to 'pay as you save' has in fact been deleted from an earlier draft. We are unaware of any explanation as to the apparent abandonment of 'pay as you save' and would be grateful if it could be explained.

In light of the above, we recommend that the DCENR builds on the significant work done to date which has not yet seen fruition to **produce a thermal retrofit programme aimed at the vast bulk of the housing stock.**

Given that the response to energy poverty is the upgrade of the vast majority of the housing stock, many of the questions in the consultation as to data gathering and analysis of energy poverty could be seen as tangential. The case could be made that the requirement is not to endlessly measure and analyse the details of energy poverty, it is to address it by means which are obvious. However, this is probably not the case.

Even an accelerated retrofit programme will take many years. Therefore it makes sense to target

retrofit based on a range of criteria. We suggest therefore that the further data collection and analysis that is required is that which would enable this targeting.

**Criteria for prioritisation** include the following:

- improving the housing conditions of those sections of the population who are experiencing the worst impacts of energy poverty, in particular:
  - residents experiencing health impacts of poor conditions
  - buildings showing mould or other factors leading to ill health
  - older residents
  - residents who are at home all day
- retrofitting groups of buildings to maximise end results and cost-effectiveness of the retrofit process
- retrofitting buildings at the point at which other major renovation or work to heating systems is being done.

One instance of retrofitting buildings at the point at which other work to heating systems is being done is the case of houses heated by turf. At the moment, householders who have been using turf illegally cut from Special Areas of Conservation are entitled to either a cash payment or a delivery of turf annually for 15 years. We have asked that this allocation be capitalised together with the existing Strategic Energy Authority of Ireland (SEAI) grants to enable the house to be retrofitted to energy efficiency and converted to renewable energy. This simple proposal has finally led to a half-hearted survey by a contractor and the opportunity for retrofit and transition is being missed. To the best of our knowledge there has been no analysis of energy affordability/fuel poverty in this engagement.

## ***Cap and Share***

Energy affordability is a central challenge of the transition to a low carbon economy. [Cap and Share](#) simultaneously provides for energy affordability and incentivises transition to a low carbon economy. Essentially it puts a price on carbon as it enters the market returning it to citizens as a dividend on an equal per capita basis. Given the lower use of energy in low energy households, it not only insulates them from the effect of price increases due to the carbon price, but has a net redistributive effect.

A share of individual citizens' Cap and Share receipts could be used as an income flow in the financing of housing retrofit.

## ***Bioenergy and spatial planning***

Bioenergy Combined Heat and Power (CHP) is an efficient way to drop GHG emissions for a whole neighbourhood including housing needing social supports. Bioenergy CHP is also essential to balance and synchronise the high level of wind energy both existing and planned in the Irish grid.

Dispersed housing patterns appear to have a significant role in creating deprivation, in particular transport poverty and fuel poverty, as well as diminishing economic opportunities.

Bioenergy CHP should be given more support to encourage compact settlements in rural areas and in urban neighbourhoods. Ireland is likely to substantially undershoot its REH targets which could be met by the roll out of bioenergy CHP especially that of pyrolysis reactors that can process municipal solid waste as well as clean biomass. Pyrolysis CHP can produce biochar a useful soil amendment that can contribute to meeting Ireland agricultural emissions targets that are even more challenging than the renewable heating and transport targets.

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