



**EXPANSION OF WARM HOME DISCOUNTS FOR WINTER 2025/26 CONSULTATION  
END FUEL POVERTY COALITION RESPONSE  
24 March 2025**

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.

As in all consultation responses, we urge policy makers to understand how their decisions can affect the affordability of energy bills, avoid discriminatory pricing, deliver longer-term reforms that bring down the cost of energy and improve the energy efficiency of homes.

We strongly support the expansion of the Warm Home Discount (WHD) as set out in the consultation.

However, we believe that in expanding the WHD, the Government must:

- Provide additional support to specific households this winter.
- Ensure changes to the park homes scheme do not adversely impact funding available for energy advice.
- Provide broader and deeper support in future winters.

*Provide Additional Support to Households This Winter*

Energy prices continue to rise, placing an unbearable financial strain on UK households. From 1 January 2025, bills increased by around 1.2% to an average of £1,738 (increases of 1.3% for PPM customers and 1.7% for Economy 7).

From 1 April 2025, energy bills will increase further by 6.4% to an average £1,842. Energy bills remain at levels 77% above winter 2020/21, but people have less ability to pay these high prices after so many years of high bills and the wider cost of living crisis.

With prices expected to remain high for the rest of the decade, many households face energy costs they simply cannot afford.

Reductions in eligibility for the Winter Fuel Payment have further reduced support for financially vulnerable older households leaving them to cut down on energy and at risk of health complications. In addition, vulnerable households are significantly more likely to ration energy, including older people, low-income individuals, renters, those with health conditions aggravated by living in cold damp homes, and prepayment users.

The need for additional support is undeniable, so the UK Government must ensure that vulnerable households receive more financial assistance to keep their homes warm this winter (2025/26).

**We welcome the proposal to remove the high-cost-to-heat threshold in England and Wales, with a proportionate adjustment in Scotland. This change will allow as many households on means-tested benefits as possible to receive the Warm Home Discount next winter**

**We strongly believe that the expanded Warm Home Discount includes those on non-means-tested disability benefits.**

Disabled people and those with long-term health conditions often face higher heating costs to maintain their well-being. Additionally, we believe the amount of the Warm Home Discount should be raised at least in line with inflation.

Our view is that the Warm Home Discount Scheme expansion for next winter should ideally be funded from sources other than customer bills, given that disabled and low-income households who narrowly miss out on the discount would otherwise bear the cost. The £4bn in excess profits made by energy network companies represents a viable source of funding that should be explored first.

#### *Changes to the Park Homes Scheme*

DESNZ is right to try and include more domestic households where bills are not paid directly to an energy supplier. Evidence from [Scope](#) suggests that disabled people are more likely to rely on these atypical supply arrangements.

In addition, an National Energy Action (NEA) report on Gypsy, Traveller, Roma, New Traveller, and Boater communities (GTRNC) found that many had received no government support during the energy crisis and 70% of GTRNC households found energy costs unaffordable with 61% reported borrowing money to pay for energy in the last year, with 29% doing so frequently.

**Given these findings, the expansion of the Park Homes scheme is essential.**

But expanding eligibility for the Park Homes Warm Home Discount Scheme (PHWHDS) without increasing the funding envelope risks hundreds of thousands of people missing out. This will include many park home residents who would previously have benefited from the PHWHDS.

**The extension of the PHWHDS should not come at the expense of funding for energy advice initiatives, which are vital for helping vulnerable households navigate the energy crisis.**

The Warm Home Discount Industry Initiative has provided significant support to hundreds of thousands of households and ensures that support reaches households that do not receive means-tested benefits. As of 2022, 27.4% of fuel-poor households were not in receipt of benefits, making industry initiatives an essential lifeline for those in need.

The 2022 impact assessment for the Warm Home Discount Scheme estimated that the Industry Initiative budget would grow to £71 million by 2025/26 due to annual inflationary increases. This represents a £9 million annual increase, equating to 60,000 additional rebates.

Our recommendation is the Government increase the WHD spending envelope to help pay for this scheme. This funding for an expanded PHWHDS should not come from taking money from other industry initiatives. Instead, it should be funded directly by the Government. Without doing this the Scheme will be inundated with requests and will rapidly run out of money. This will leave many disabled people unable to access support.

### *There Is a Need to Provide Broader and Deeper Support in Future Winters*

The proposed changes to the Warm Home Discount scheme are modest compared to the scale of the crisis. Since its introduction, the Warm Home Discount rebate has only increased by £10, while energy prices have risen by hundreds of pounds a year.

Current Warm Home Discount rebates are limited to households receiving means-tested benefits in England and Wales, who also have high energy costs. However, a third of fuel-poor households receive no means-tested benefits, leaving them without access to this support.

While we recognise there may be constraints of what can be achieved immediately, future initiatives must ensure that more households receive deeper financial assistance. Ideally this will be through reductions in unit costs - as delivered in the past through the Energy Price Guarantee Scheme and Prepayment Meter levelisation.

We hope that the next WHD consultation will result in a sustainable energy bill support scheme that effectively targets all low-income households. Potential target groups for additional support include:

<b>Group</b>	<b>Explanation</b>
<b>Households in receipt of benefits</b>	Households that are already receiving means-tested and non-means-tested benefits.
<b>Households with a minimum debt level accrued during the energy crisis</b>	These are households with significant energy debts. Support could be linked to weekly payment assessments that evaluate a householder's ability to pay, serving as a proxy for financial vulnerability.
<b>Households using prepayment meters</b>	Prepayment households are more likely to have low incomes (£18,000 or less), include members with disabilities, be single-parent families, or lack formal educational qualifications.
<b>Households on the Priority Services Register (PSR)</b>	While not all households on the PSR are financially vulnerable, certain categories indicate a high energy need.

For example, PSR08 covers households with life support equipment at home.

Expanding support beyond those receiving means-tested benefits will ensure that more households in need receive financial relief. Energy costs will remain high for the foreseeable future, making it imperative to introduce policies that provide both short-term relief and long-term structural support for vulnerable households.

**Some of our members have also already responded individually to the consultation and the wider End Fuel Poverty Coalition membership wish to add their support to the views put forward by Fair by Design, National Energy Action, Scope and others.** We would be grateful if you could continue to keep the Coalition informed about developments in this consultation.

### **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: [Action with Communities in Rural England](#), [ACE Research](#), [Advice for Renters](#), [AgeUK](#), [All Birmingham's Children](#), [Austerity Action Group](#), [Association of Green Councillors](#), [Association of Local Energy Officers](#), [Association for Decentralised Energy](#), [Asthma + Lung UK](#), [Basingstoke & Deane Borough Council](#), [Beat the Cold](#), 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](#), [Debt Justice](#), [Disability Poverty Campaign Group](#), [Disability Rights UK](#), [E3G](#), EBICO, [Energise Sussex Coast](#), Energy Advice Line, Energy Cities, [Epilepsy Action](#), [Exeter Community Energy](#), Fair Energy Campaign, [Fair By Design](#), [Foster Support](#), [Friends of the Earth](#), [Fuel Poverty Action](#), Fuel Poverty Research Network, [Generation Rent](#), [Good Law Project](#), [Greenpeace](#), [Groundwork](#), Hackney Foodbank, [Heat Trust](#), Home Start Oxford, [Independent Age](#), [Independent Food Aid Network](#), [Inner City Life](#), [Joseph Rowntree Foundation](#), [Lambeth Pensioners Action Group](#), [London Borough of Camden](#), London Borough of Lewisham, [Marie Curie](#), [Mencap](#), [Mayor of London](#), [MECC Trust](#), Moorland Climate Action, [National Pensioners Convention](#), National Union of Students / [Students Organising for Sustainability](#), NCB, [National Energy Action](#), [New Economics Foundation](#), National Federation of Women's Institutes, [Northern Health Services Alliance](#), [Oxford City Council](#), [Positive Money Tower Hamlets](#), [Plymouth Community Energy](#), Redcar & Cleveland Council, [Repowering London](#), Retrofit Bruton, Right To Energy Coalition, [Rossendale Valley Energy](#), [Ryecroft Community Hub](#), [Save the Children](#), [Sense](#), [Severn Wye](#), [Scope](#), [Shaping Our Lives](#), [Social Workers Union](#), [South Dartmoor Community Energy](#), [South East London Community Energy](#), [Southwark Group of Tenants Organisations](#), [South West London Law Centres](#), [Stop The Squeeze](#), [Tamar Energy](#)

[Community](#), [Thinking Works](#), Uplift, [UNISON](#), Warm & Well North Yorkshire, [Warm & Well in Merton](#), [Winter Warmth Network](#), [Young Lives vs Cancer](#), [361 Energy](#).

The Coalition is also part of the [End Child Poverty Coalition](#) 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](#).

Contact: [info@endfuelpoverty.org.uk](mailto:info@endfuelpoverty.org.uk)