

National Bargee Travellers Association

Consultation response: Expanding the Warm Home Discount Scheme 2025/26: Department of Energy Security and Net Zero (ESNZ)

Introduction

This consultation response is from the National Bargee Travellers Association (NBTA). The NBTA is a volunteer organisation formed in 2009 that campaigns and provides advice and support for itinerant boat dwellers on Britain's inland and coastal waterways ("Bargee Travellers"). This includes anyone whose home is a boat and who does not have a permanent mooring for their boat with planning permission for residential use. The NBTA is the only national organisation in Britain dedicated to upholding and defending the rights of itinerant boat dwellers. The NBTA has members on all the major navigation authorities' waterways and beyond. The NBTA has over 2,200 members and deals with at least 200 individual cases each year.

The navigable inland waterway system in Britain is home to an estimated 15,000 to 50,000 Bargee Travellers. There are as yet no accurate statistics for the number of people living on boats either with or without a permanent mooring in the UK. There are at least 21 inland navigation authorities in the UK. Canal & River Trust is the largest, with around 80% of the UK's inland waterways. Other significant navigation authorities are the Environment Agency; the Broads Authority; the Conservators of the River Cam; the Middle Level Commissioners; Peel Holdings (the Bridgewater Canal) and British Waterways Scotland (trading as Scottish Canals). An unknown number of Bargee Travellers live in coastal harbours and estuaries, some of which are controlled by harbour authorities. We are responding to Questions 1, 4, 5, 6 and 7.

Q1. The high cost to heat threshold currently means that the scheme for those on means tested benefits is limited to those with the highest costs of heating. Taking account of the cost to bill payers from expanding the scheme, do you agree that we should remove the high cost to heat threshold, so that as many households on means tested benefits as possible receive the WHD?

Yes

Q4. Do you agree that the Park Homes Warm Home Discount Scheme should be broadened to include other household types where bills are not paid directly to an energy supplier?

Yes

Q5. Who should this be broadened out to (for example, housing association/private tenants supplied via a landlord, houseboats at residential moorings, travellers on authorised fixed sites)?

The Warm Home Discount scheme and/or the Park Homes Warm Home Discount Scheme should be expanded to include **all** households on means tested benefits who do not have a direct relationship with an energy supplier, but who instead purchase their fuel from retail suppliers such as coal boats, boatyards, garages, coal merchants or from their landlord.

The 2021 Census identified approximately 105,000 people (not households) living in mobile accommodation such as boats and caravans. This is very likely to be an underestimate because not all mobile households would have been able to complete the census due to not having a residential address that is listed on the Postcode Address File. Estimates by boat dweller and Gypsy/ Traveller organisations suggest that around 50% of this population live on boats. This information was not able to be extrapolated from the 2021 Census data due to the structure of the Census questions.

By definition, a household living in a boat or a caravan does not have a direct relationship with an energy supplier. We believe that all households without a direct relationship with an energy supplier, **without exception**, should be able to receive the Warm Home Discount if they are in receipt of means tested benefits.

Boat dwellers live on the UK's inland waterways and around the coast on tidal river estuaries, harbours and coastal moorings. There are at least 21 inland navigation authorities in the UK, many harbour authorities and an unknown number of coastal moorings that are not controlled by any navigation authority.

To restrict the eligibility of boat dwellers to those living on residential moorings excludes the vast majority of boat dwellers. Fewer than 5% of moorings in the UK are residential and even then, not all moorings with full planning consent for residential use have their own postal address.

Most boat dwellers who have a permanent mooring are living on moorings that are classified as either 'high use' or 'leisure'. These moorings have limitations on the number of days per year the boater can stay overnight on the mooring. These limitations vary and there is no set limitation or allowance. Boat dwellers with high use or leisure moorings therefore live on their boats all year round, but may not occupy the mooring every night of the year. These moorings do not have a postal address. Almost all boat dwellers who have high use or leisure moorings were excluded from the 2022-23 Energy Bills Support Scheme.

A significant number of boat dwellers are itinerant with no permanent mooring: Bargee Travellers. Itinerant boat dwellers on all navigation authorities' waterways apart from Canal & River Trust were excluded from the 2022-23 Energy Bills Support Scheme.

Other types of households without a direct relationship with energy suppliers who were excluded from the 2022-23 Energy Bills Support Scheme are: Gypsy and Traveller households on tolerated but not authorised fixed sites; Gypsy and Traveller households who are itinerant, not residing on a fixed site; van dwellers both on tolerated sites and who are itinerant, not residing on a fixed site; other households in fixed homes that are off-grid, without a direct relationship with an energy supplier.

The types of fuel purchased by boat dwellers and other off-grid households for heating, lighting and cooking are varied. They include wood, coal, and other solid fuel for solid fuel stoves; bottled LPG gas for gas cooking stoves, water heaters; room heaters and central heating; heating oil; diesel for diesel heating, cooking stoves and electricity generators; petrol for electricity generators; and electricity purchased from the landlord via electricity hook-ups at moorings or caravan sites.

The variety of fuel suppliers used by households without a direct relationship with an energy supplier means that it would be completely impractical for the mechanism for

payment of the Warm Home Discount to be made through retail suppliers. In particular, Bargee Travellers move around and do not buy their fuel from the same supplier each time.

ESNZ must learn from the failure of the Energy Bills Support Scheme to include the majority of the population of boat dwellers, Gypsies and Travellers, and other communities and households whose homes are off-grid. These populations live on some of the lowest incomes in the country, and experience multiple deprivations. They are also more likely than other communities to be digitally excluded, partly due to the shortcomings and patchy coverage of mobile broadband compared to fibre or cable broadband.

In order to be fully inclusive, the mechanism for payment of the Warm Home Discount **must be through the benefit payment itself**, in the same way that the Winter Fuel Payment was paid via the normal State Pension payments. Any other means of payment risks excluding those who do not have a residential address that is listed on the Postcode Address File, and do not have a direct relationship with an energy supplier and who therefore by the nature of their fuel supply are not named on any energy bills.

Also to be avoided at all costs is the experience of Bargee Travellers on Canal & River Trust waterways. While we welcomed the eventual inclusion of our community by ESNZ in the 2022-23 Energy Bills Support Scheme, this followed intensive lobbying by the NBTA, Canal & River Trust, and Gypsy and Traveller support organisations. However the mechanism for payment was extremely problematic and we would not recommend using the method again. Itinerant boat dwellers who qualified were sent vouchers by post or email. These vouchers for £600 were provided by PayPoint. Many itinerant boat dwellers were unable to pay the vouchers into their bank account either online (if they were digitally included enough to use online banking) or in person at a bank branch. When Bargee Travellers attempted to redeem the PayPoint vouchers at a PayPoint counter in the shops and supermarkets that participate in the PayPoint scheme, they were frequently told that the shop did not have enough cash in the till to redeem the voucher; that the voucher could only be redeemed in small sums, necessitating multiple visits to the same shop or different shops; that the shop was not participating in that particular scheme; that they should come back “later” or “earlier” when there would be more cash available; or that the shop was no longer participating in PayPoint or redeeming those specific vouchers. Bargee Travellers experienced considerable anxiety and stigma attempting to redeem the vouchers. Some were simply unable to find enough PayPoint outlets to redeem all £600 of the voucher before the deadline, and lost part of the grant as a result.

Finally, we recommend that ESNZ should re-run this consultation specifically directed at Travelling, boat dweller and off-grid communities/households in order to remedy the defects of the attempt to make the 2022-23 Energy Bills Support Scheme accessible to these communities.

Q6. Do you agree that this extension should be done within the existing budget for the Park Homes Warm Home Discount Scheme?

No, the budget should be increased if necessary.

Q7. Do you agree that we should retain the broader group in Scotland for the time being, and instead ensure that more people become eligible for rebates by increasing suppliers' non-core obligations in Scotland in proportion to any expansion of the scheme in England and Wales?

Both the eligibility and the payment mechanism should be expanded in Scotland in the same way as we have described above, to ensure that all households without a direct relationship with an energy supplier are included.

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