Written evidence submitted by the National Retrofit Hub (WCH0027)

1. INTRODUCTION

2. The Warm Homes Plan, and the announcement of the Warm Homes Agency, were important steps towards scaling up the pace and ambition to improve the nation's homes, meet fuel poverty, health and climate targets. However, since the plan was released, the department has been slow to develop and announce important content behind the plan's promises.

3. Our network consistently calls to be more engaged and involved in the design of the plan's implementation, to see the faster publication of plan details, and to have longer-term certainty on standards, funding, targets and support.

4. The National Retrofit Hub is a non-profit community interest company that brings together those working in and adjacent to the retrofit sector, to share knowledge, build consensus and co-design solutions to enable the improvement of our homes and places. Our mission is to enable the industry and policymakers to work better together, and learn from one another, to support comfortable, healthy, low-carbon and resilient homes for all.

5. There are three key areas of the Warm Homes Plan that require more detail, and would benefit from industry and local involvement to shape effective policy:

    a. The Warm Homes Agency.

    b. The future combined low-income scheme.

    c. Minimum Energy Efficiency Standards (MEES) implementation.

6. For each of the three we will share insights and evidence we have gathered from our network and provide recommendations for next steps. We also explore the focus of the Warm Homes Plan in the context of multiple, overlapping needs. Alongside the topics explored in this paper, the future consumer protection regime is a critical component – our insights and recommendations on this can be read within our consultation response, available here: Link.

7. THE WARM HOMES AGENCY

8. The WHA is widely seen as an important opportunity to strengthen how retrofit is coordinated and delivered. It has the potential to support progress towards the government's objectives alongside wider outcomes for people, homes and places. However, its detailed design matters, if it is to strengthen and grow an integrated retrofit system and avoid creating unintended consequences.

9. Between March and June 2027 the NRH convened our Advisory Panel, Community Retrofit and Driving Demand working groups, and advice providers in South West England to discuss the future Warm Homes Agency.

10. Participants supported the creation of central body that provides clarity and coordination, alongside a consistent message to the public. There was strong consensus that advice and delivery must remain rooted in local knowledge, working to support existing and emerging local providers.

11. Scope, scale and structure

12. Our network consistently support the idea of a national “front door” for retrofit., a central point that helps people understand the process and navigate what can be a complex landscape. At the same time, the agency should not attempt to deliver everything itself. Instead, its role should be to provide structure and coordination across a system that is already distributed.

13. This points towards a model where the agency focuses on:

    a. Clear, high-level information and signposting.

    b. A shared framework for advice.

    c. Standards for quality, performance and data.

    d. Coordination across programmes and actors.

14. A visible and coherent public offer will be important. This should help households and industry understand what retrofit involves, what support is available, and how this connects to the future of home heating.

15. The agency must give urgent clarity about what is in scope. Starting from what already exists, and being transparent about the agency’s role and limits, will help avoid confusion and delays. We hear from Local Authorities who are ‘in limbo,’ not knowing whether to invest their precious time and resource in creating local services such as advice provision, one stop shops, or lists of competent trades, or, whether a future WHA will do this work. Relationships and connections between the WHA and those delivering and enabling community energy projects, both Great British Energy (GBE), third sector and local organisations, should be developed.

16. Existing models provide useful lessons. The Sustainable Energy Authority of Ireland offers one example of a central coordinating body in this space, while in the UK MoneyHelper provides a relevant comparison in how a public-facing service can offer clarity while working with a wider system.

17. Advice and standards

18. There is already a strong based of advice provision in some areas. The sector has also produced good, accessible literature on core topics, for example: learnings collated from the LEAD programme, The RISE Knowledge Hub, the NHIC's doorstep digest, and the NRH's work creating directories of information on retrofit archetypes, data, retrofit communications, and community and neighbourhood engagement.

19. The role of the WHA should be to bring greater consistency and visibility to this, rather than replacing it. A shared baseline of information and agreed principles would be valuable. This could provide a common foundation that can then be adapted locally.

20. It is critically important that the agency differentiates between information and advice. The agency can provide information - helping people understand the retrofit process, what to expect, who to speak to and how to access redress. The agency should not provide building specific advice, as this should come from an expert advisor with an understanding of the specific home, likely provided locally. The agency could provide a standard advice framework that could be adapted to reflect local need. This would build trust and consensus at the national scale, while supporting the delivering of locally relevant detailed advice. The WHA could also consolidate and make readily available learnings from previous demonstrator programmes (such as the LEAD – Local Energy Advice Demonstrator).

21. Energy advice providers highlight the need for integrated energy, health and other types of advice. Ensuring interventions in homes improve both the health and comfort outcomes of residents. Effective guidance and programmes include: Winter Wellbeing Guide, Healthy Homes Dorset, Community Wellbeing Hub and Somerset Social Housing. The WHA should support partnerships between health bodies, ICBs and the retrofit sector.

22. Above all the WHA should engage directly with existing advice providers to maximise on their decades of experience in multi-agency and stakeholder collaboration. The South West Energy Advice Providers Forum is one example of a network that could better engaged to support the design and implementation of an effective agency. More information on what these organisations would like to see from the WHA is available here.

23. Relationships with existing bodies, local delivery and communities

24. The current landscape for retrofit is active but fragmented. There are many organisations already involved in advice, funding and delivery. The WHA should work with this landscape, not duplicate it.

25. In some places local capacity has been built successfully but has been difficult to sustain once funding ends, and without future funding certainty. This highlights the importance of continuity and long-term thinking.

26. The WHA needs to take a supporting and enabling stance, actively engaging with those who will deliver the schemes it designs and administers. The Warm Homes Plan sets out that the agency will bring together functions currently held by Salix, Ofgem and DESNZ. Alongside this, there is an opportunity to strengthen how different parts of the system connect. This includes better alignment between advice providers, facilitators and delivery organisations, as well as closer links with related initiatives such as the Local Power Plan and Pride in Place.

27. Local authorities, community groups and regional hubs are often the first point of contact for households, and play a critical role in enabling place-based approaches, building supply chains and developing resident trust. Working with these organisations, with involvement, resourcing and support, will be key.

28. THE FUTURE COMBINED LOW-INCOME SCHEME

29. At the end of 2025 the government announced that the Energy Company Obligation would be brough to a close. This followed the discovery of failures in process, delivery, quality and consumer protection in the latest rounds of the scheme. Some argue that diminish governance requirements and an increase in the complexity of what the obligation intended to deliver created the conditions for these failures, but that stopping all obligation schemes was "Throwing the baby out with the bathwater."

30. The scale at which ECO delivered energy upgrades far exceeded those delivered through other schemes such as Warm Homes: Local Grant (formally LAD), and the Social Housing Fund (formerly SHDF). Since 2021 approximately 430,000 insulation measures have been delivered through ECO, compared with around 160,000 through LAD, HUG and SHDF combined. While the later schemes had the design, governance controls, and oversight from local authorities and/or registered providers to mitigate against poor outcomes, they are not currently delivering at the pace and scale needed to meet national targets.

31. The Warm Homes Plan makes clear the intention to combined LG and SHF into a single low-income scheme. This will need to do much more than simply combine existing scales of delivery, it will need to reach more, deliver more and act as a catalyst for wider retrofit sector development.

32. The NRH's place-based work makes the clear case for place- and area-based delivery, and empowering local actors to design and implement retrofit strategies and

programmes. Local authorities, organisations, businesses and community groups understand their place, the needs of their people, their supply chain, and can design retrofit strategies to meet local needs, build trust, develop local economies and deliver quality work. Our report Understanding Place-Based Retrofit makes the case for and defines place-based retrofit, Place-Based Retrofit In Practice provides guidance and tools for those engaging with place-based approaches, and Healthy Homes: Resilient Places provides recommendations for national government to support place-based approaches.

33. Our research and engagement with the retrofit industry, retrofit facilitation providers and local acts found a clear need for:

    a. DESNZ to co-design funding and finance programmes with local delivery partners of the Warm Homes Plan.

    b. DESNZ and MHCLG to incentivise and resource partnerships between the full range of local delivery partners, including local authorities, the supply chain, and community organisations.

    c. DESNZ and MHCLG to build institutional capacity within local authorities to develop procurement practice which supports Community Wealth Building (CWB) and bring labour in house where appropriate.

34. Some Local Authorities have built effective teams, capacity and capability to deliver on Warm Homes: Local Grant. However, we have heard that, without certainty on the next round of funding and the future combined scheme they struggle to maintain teams, who are often funded through grant delivery, and risk losing institutional knowledge and momentum.

35. IMPLEMENTATION OF MINIMUM ENERGY EFFICIENCY STANDARDS

36. The upgrade to Minimum Energy Efficiency Standards for the private (and eventually social) rented sector(s) is welcome change announced as part of the Warm Homes Plan. Privately rented homes have higher rates of fuel poverty[1], health hazards and damp and mould than any other sector, for example 9% of privately rented homes have issues with damp and mould (compared with 4% of owner-occupied dwellings)[2] .

37. The standard will only be as effective as its detailed design and implementation, and the department must consider how the changes it proposes may affect wider issues around housing access and affordability. The NRH explore these topics, and provide

[1] Gov.uk, Annual fuel poverty statistics report: 2026, March 2026
[2] Gov.uk, Housing Quality statistics, January 2025

recommendations in the report Improving Health and Housing Outcomes in the Private Rental Sector, which covers 5 issues:

a. Rental affordability and security.

b. Better treatment of, and support for, tenants.

c. Effective housing standards enforcement and high levels of compliance.

d. High-quality work and effective redress routes.

e. Stable housing supply, across tenures.

38. FOCUS OF THE WARM HOMES PLAN

39. This call for evidence asks, "Should the Agency have a focus on comfortable homes (warm in winter, cool in the summer) rather than simply focussing on heating solutions?" The simple answer is yes, but we can go much deeper and do better at delivering all outcomes needed by households.

40. The most effective retrofit strategies will be grounded in a deep understanding of the needs and resources of a place, explored in our Place-Based resources, and paper Health, Place and Retrofit. One methodology we have developed in partnership with Centric Lab to map, understand and make plans to meet local needs is the Community health Impact Assessment for Retrofit. This process gathers lived-experience and works in partnership with the community to provide a nuanced understanding of local needs, opportunities, and challenges. This process engages, involves and empowers citizens to inform decision-makers, ensuring that programmes address the challenges that actually matter to citizens.

41. When we consider how the Warm Homes Plan can go beyond energy efficiency, warmth, and carbon we should take this holistic lens, and consider how many myriad benefits we can bring from retrofit programmes, when they are design with community needs and resources at their heart. Local authorities, organisations, retrofit facilitation providers and community groups are well places to facilitate this work, but must be resourced, empowered and better involved in national policy to do so.

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