Efficient Investment

Placing Homes at the Heart of a Green Recovery in 2021



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About the Energy Efficiency Infrastructure Group

The Energy Efficiency Infrastructure Group is a growing and broad-based coalition of over 25 industry groups, NGOs, charities and businesses asking for rapid improvement in energy efficiency policy for UK homes and buildings. Massive improvements in energy efficiency are the litmus test for a credible pathway to net zero emissions and ending fuel poverty. The EEIG is calling for energy efficiency to be treated as a national infrastructure investment priority, with a commensurate target – achieving an Energy Performance Certificate (EPC) rating of C (on a scale from A (most efficient) to G) for all homes by 2030 – and clear governance arrangements, a long-term plan and a pump-priming capital budget to achieve it. While it represents the views of the EEIG as a whole, this briefing does not necessarily represent the views of its individual members.















































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Efficient Investment: Placing Homes at the Heart of a Green Recovery in 2021

2021 will be a defining year for decarbonising UK homes – with important policy decisions to be made through the Heat and Buildings Strategy, and crucial capital allocations needed from the Budget and Spending Review. Meanwhile, the launch of a National Infrastructure Bank provides new opportunities to leverage much-needed finance to underpin this transition.

The Energy Efficiency Infrastructure Group (EEIG) has identified three near-term priorities for the Government to cement the welcome progress made last year through green home stimulus measures, and help set the course for a long-term green recovery aligned with the UK's climate commitments and levelling up agenda:

1. Meeting the funding shortfall: Allocate at least £1.2bn¹ to energy efficiency and heat pumps support through the Budget in 2021, and £11.3bn through the Spending Review for the subsequent three years to 2024/25² – additional to existing commitments and with full roll-over of Green Homes Grant (GHG) spending. This is the level of investment required to get on track to meet the EEIG's vision of all homes achieving an Energy Performance Certificate rating of at least C by 2030, and heat pumps deployed by 2030 consistent with the Climate Change Committee's 'Balanced Pathway' to net zero.

ADDITIONAL PUBLIC INVESTMENT NEEDED THIS PARLIAMENT FOR RESIDENTIAL BUILDINGS	ALLOCATED THROUGH BUDGET 2021 FOR 2021/22	ALLOCATED VIA SPENDING REVIEW 2021 FOR NEXT 3 YEARS	TOTAL ACROSS 2021/22 TO 2024/25
Energy efficiency	£0.7bn	£6.7bn	£7.4bn
Heat pumps	£0.5bn	£4.6bn	£5.1bn
Total	£1.2bn	£11.3bn	£12.5bn

- 2. Accelerating and coordinating action through the Heat and Buildings Strategy, especially for owner-occupied homes: Launch a suite of policies to drive high quality home decarbonisation aligned with the 6th Carbon Budget and the updated Nationally Determined Contribution. Provide a roadmap for introducing minimum energy efficiency and carbon standards for the owner-occupied sector within which the largest climate benefits are to be made and introduce supportive structural incentives, including a Green Stamp Duty. Ensure excellent execution, learning and applying lessons from the Green Homes Grant scheme to support and scale skills and supply chains.
- **3. Seizing opportunities through the National Infrastructure Bank:** Ensure a net zero built environment is a priority area from launch, leveraging private and blended capital at scale.

This short briefing sets out why there is a need for additional, long-term capital spending commitments on green homes over the crucial period to the end of this Parliament, and outlines where further policy action is needed to get on course to meet the EEIG's six core recommendations for Government outlined in the appendix.

¹ We note this amount may increase subject to incomplete rollover of the Green Homes Grant ² These numbers are based on analysis from EEIG's September 2020 report, updated to reflect new commitments announced since then https://www.theeeig.co.uk/media/1099/eeig_report_turning_stimulus_into_recovery_pages_web.pdf

Better buildings are pivotal for building back better

Green homes and buildings have a central role to play in a strong economic recovery and building back better from the coronavirus crisis, as the EEIG set out in reports published last year.³ A long-term home decarbonisation programme could support 190,000 green jobs to 2030 in energy efficiency and low carbon heat across the UK. Green homes contribute to levelling up and addressing inequality, with a long-term programme reducing household energy expenditure by £7.5bn per year; doing more in regions most affected by unemployment, under-investment and fuel poverty – and reducing north-south and rural-urban disparities. Such a programme could reduce pressure on the NHS, helping to prevent 10,000 excess winter deaths every year and saving £1.4 to £2bn annually.⁴ Decarbonising homes is essential for the UK to meet its net-zero commitment and show international leadership ahead of COP 26. Furthermore, there are opportunities for UK-based manufacturers and financial institutions with world-leading expertise in green building products and services to drive exports and gain competitive advantage in international markets.

Still lagging on lagging

The Conservative Manifesto contained a very welcome commitment to invest £9.2bn in energy efficiency measures for low income households and public buildings over five years, and for social housing over 10 years. The manifesto's costings – which run up to 2023/24 – indicated the investment trajectory shown in Figure 1.

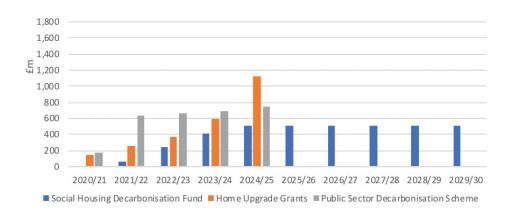


Figure 1: Manifesto commitments on energy efficiency in Conservative Manifesto (trajectory estimated from 2024/25)

Our analysis suggests that so far this Parliament, £1.735bn of the commitments have been allocated to the end of March 2022. **This leaves £7.465bn of the £9.2bn yet to a higher level of funding is be confirmed.** This is broken down in Table 1.

³ See https://www.theeeig. co.uk/media/1099/eeig_report_ turning_stimulus_into_recovery_ pages_web.pdf and https://www. theeeig.co.uk/media/1091/eeig_ report_rebuilding_for_resilience_ pages_01.pdf

⁴ https://www.e3g.org/news/ uk-has-sixth-highest-rate-of-excesswinter-deaths-in-europe/

We note this commitment does not state to include heat pumps, hence why our analysis indicates a higher level of funding is required to get on track for home decarbonisation

https://assets-global.website-files. com/5da42e2cae7ebd3f8bde353c/5ddaa257967a3b50273283c4_ Conservative%202019%20 Costings.pdf

The £2bn GHG and Local Authority Delivery scheme were introduced last year – additional to commitments made in the Manifesto – and the Government has signalled will be rolled over and extended to 2021/22 and topped up to £2.32bn.7 The Prime Minister's extension of the GHG is until the end of March 2022 for the £1.5 billion voucher element, and until the end of December 2021 for the £500 million Local Authority Delivery element. Despite public statements8, we note there still remains uncertainty within industry concerning the full roll-over of the Grant and seek firm confirmation of this at the Budget. We note that certain commitments – such as the Green Homes Grant – only apply to England. There is a need for a full assessment of the relative funding shortfalls between devolved nations through the Budget and Spending Review.

Table 1: New funding commitments and manifesto pledges across 2020/21 to 2021/22

SCHEME	SUMMER ECONOMIC STATEMENT	SPENDING REVIEW/10-POINT PLAN	TOTAL COMN FAR (TO 2021	
Manifesto: Social Housing Decarbonisation Fund; £3.8bn over 10 years to 2030	£50m for 2020/21	£60m for 2021/22	£110m	£1.735bn of £9.2bn
Manifesto: Home Upgrades Grant; £2.5bn over 5 years to 2025	-	£150m for 2021/22	£150m	committed so far - £7.465bn not yet
Manifesto: Public Sector Decarbonisation Scheme; £2.9bn over 5 years to 2025	£1bn for 2020/21	f1bn extended to 2021/22 and topped up with £475m	£1.475bn	committed
New: Green Homes Grant (and Local Authority Delivery scheme)	f2bn for 2020/21: f1.5bn for Grant and f0.5bn for Local Authority Delivery	f1.5bn extended to 2021/22 and topped up with f320m. Local Authority Delivery extended to December 2021	£2.32bn	
Funding committed overall	£3.05bn	£1.005bn	£4.055	
Of which committed to homes	£2.05bn	£0.53bn	£2.58bn	
Assuming two thirds are used for energy efficiency:			£1.72bn	
Assuming one third is used for heat pumps ⁹ :			£0.86bn	

https://www.gov.uk/government/ news/green-homes-grantextended-for-extra-year
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 Assumed split is predicated that heat pumps will be a popular element of the Green Homes Grant scheme in particular, and acknowledges that Social Housing Decarbonisation Fund and Home Upgrades Grant funds can be used for heat pumps as well as energy

efficiency measures.

Figure 2 shows the commitments to date, including (shown with dotted outlines), what the average annual deployment of the manifesto's investment commitments would look like to 2030.

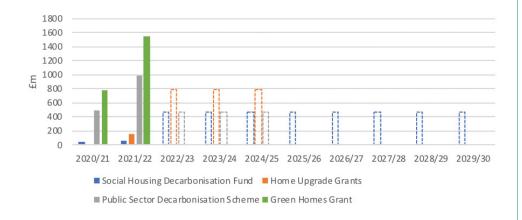


Figure 2: Commitments to date and average annual investment needed to deliver remaining manifesto commitments.

Funding: delivering on promises and raising the level of investment

Following the Summer Economic Statement, the EEIG set out in September 2020 that in order to reach the goal of all homes achieving at least an EPC C by 2030, the Treasury should allocate £7.8bn for home energy efficiency investment – in addition to the summer's Economic Statement – over the four years to the end of this Parliament, and £5.8bn to support heat pumps deployment in existing homes. ¹⁰ The multi-year Comprehensive Spending Review was postponed, and instead a 1-year Review was announced, adding £530m for these households (with additional funding for public buildings):

- £320m funding for the GHG in 2021/22, and rollover of existing GHG pot
- A further £60m to retrofit social housing
- £150m to help "some of the poorest homes"

On the assumption that two thirds of this money and the remainder of the manifesto commitments go to energy efficiency and one third to low carbon heat, the following sums are still required this Parliament to meet the shortfall.

Energy efficiency

A total investment of £28.3bn from public and private sources in energy efficiency is needed this Parliament to get homes on track for EPC C by 2030, as shown on the left-hand side in Figure 3.

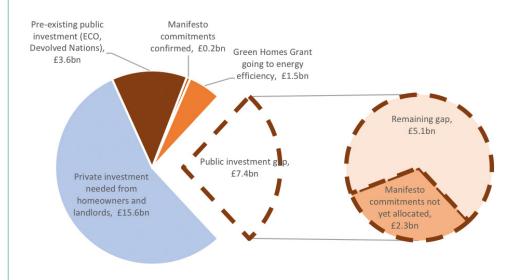


Figure 3: Investment in home energy efficiency needed this Parliament and public investment gap

£7.4bn of public capital investment is still needed over this Parliament to deliver the public funding component of the EEIG's vision for energy efficiency. £2.3bn of this could be met from manifesto commitments ear-marked to 2025, which need to be confirmed. The remaining £5.4bn needed would constitute a new commitment and could take the shape of improved and continued Green Homes Grant and Local Authority Delivery schemes, in addition to structural incentives and financial mechanisms (such as Green Stamp Duty or zero interest lending) to leverage private finance. The EEIG recommends further confirmation of manifesto commitments and new funding be confirmed in the Budget for 2021/22 and in the three-year Comprehensive Spending Review at the end of 2021:

- At **Budget 2021**: a further **£0.7bn**¹¹ for 2021/22, provided the roll-over of the initial GHG t allocation is confirmed.
- In the Spending Review 2021: £6.7bn over the rest of this Parliament.

¹¹ We note that the split in spending requirements between the 'able to pay' and low-income households will depend on the amount of the Green Home Grant which was allocated to each category

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Heat pumps

Accelerated energy efficiency investment is needed to ensure household energy bills are reduced as the UK decarbonises, at the same time as establishing the necessary technical conditions for fully decarbonising the way we heat our homes. Heat pumps will play a central role, for which further public capital investment is needed to drive deployment into existing homes by helping households with the upfront capital cost. Public investment for heat pumps was not referred to in the Conservative Manifesto commitments, although in practice some of these allocations are likely to go to zero emissions heat solutions. More capital will be needed to meet the shortfall to get our homes on track to meet climate targets.

Shown in Figure 4, a total investment of £8.9bn in heat pumps from public and private sources is needed this Parliament to get homes on track with deployment in the Committee on Climate Change's 'Balanced Pathway' towards meeting the 6th carbon budget and net zero – which requires faster scale-up than the Government's 600,000 installation target (which includes new build) in 2028.

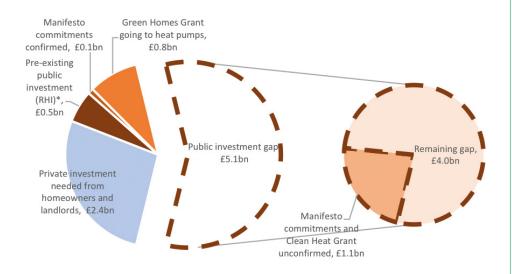


Figure 4: Investment in home heat pumps needed this Parliament and public investment gap

£5.1bn of public capital investment is still needed over this Parliament to have a meaningful impact on heat pumps deployment and to get on track for the 6th carbon budget. £1.1bn of this could be met from manifesto commitments to 2025, including the Clean Heat Grant as currently proposed. The remaining £4bn needed would constitute a new commitment and could take the shape of improved and continued GHG and Local Authority Delivery schemes or a much more ambitious Clean Heat Grant. The EEIG recommends further confirmation of manifesto commitments and new funding be confirmed in the Budget for 2021/22 and in the three-year Comprehensive Spending Review at the end of 2021:

^{*} Approximate cost of Renewable Heat Incentive payments for an estimated 167,000 total installations across 2020/21 and 2021/22 after Green Homes Grant is deducted

- At **Budget 2021**: a further **£0.5bn** for 2021/22, provided the rollover of the initial Green Homes Grant allocation is confirmed.
- In the Comprehensive Spending Review: £4.6bn over the rest of this Parliament

Unlocking private investment and securing results

BEIS's Heat and Buildings Strategy must set the vision, targets, framework and mandate to get the UK on track to meet its climate targets and interim carbon budgets – including the Climate Change Committee's 6th Carbon Budget, and Nationally Determined Contribution to reduce emissions by 68% by 2030. The Strategy is the essential vehicle for establishing the policies and regulatory standards, complementing public capital investment, that secure the private investment from homeowners and landlords needed, and enable the balance of public and private investment to shift towards the latter as markets develop and costs fall. The Strategy must set out its vision for new, long-term regulatory standards for energy and carbon performance for all tenures and heating system replacements – announcing early and building on the pioneering proposals for the new private-rented sector Minimum Energy Efficiency Standard. These are the necessary cornerstone for decarbonising homes, critical to driving demand, stimulating innovation and reducing costs, as well as tilting the balance towards private investment and securing the net zero outcome.

Lessons must be learnt and applied, including from the GHG to ensure strong and high-quality execution of future policies and schemes, with further support for **scaling up skills, accreditations, and supply chains**. Household **engagement and education** will also be key, with a role for innovative tools like Building Renovation Passports, as well as ensuring a robust **consumer deal** which assures high-quality works.

For 'able to pay' households, a key sector, funding should be channelled through subsidies and incentives which become self-sustaining over time. We call for the **Green Homes Grant** to be improved, simplified and extended until the end of Parliament, alongside, or potentially in place of, a **boosted Clean Home Grant**. HMT should introduce a suite of new structural support mechanisms including **Green Stamp Duty**, **zero interest loans** offered through the new **National Infrastructure Bank**, **Landlords Capital Allowance** for energy upgrades, and **zero-rated VAT** on retrofits. Innovative **community-based blended finance** should also be considered.

For low income and vulnerable households, financial support should be ongoing, channelled through the **Homes Upgrades Grant** and **Social Housing Decarbonisation Scheme**, as well as additional means tested support offered through the schemes identified above. We welcome recent announcements to extend the **Energy Company Obligation** to 2026 and expand the **Warm Homes Discount**.

Lastly, and importantly, the strategy should strive to ensure that energy efficiency and low carbon heat policies are fully joined up, for example, ensuring that homes benefiting from a heat pump are properly insulated, and that the fabric is performing well in reality – a fabric first approach. This is vital for maintaining comfort levels, reduced energy bills and enabling householders to access new billing mechanisms such as Time of Use tariffs.

Firm foundations for a better future

Although there is a lot left to do, progress is being made on energy efficiency, and green homes must continue to be a key priority for Government over the rest of Parliament. The last section of this briefing tracks the progress made towards the EEIG's six core asks for a credible, long-term energy efficiency programme, last presented in our September 2020 report. It highlights, for example, that much more needs to be done with respect to decarbonising heat supply.

The UK Government has rightly identified home retrofits as a key measure for a green recovery, and we welcome the stimulus offered so far through the GHG and other schemes. Continued support is needed through the Budget and Spending Review, delivering and expanding on the promises made in the Conservative's manifesto and putting the UK on track to meet its climate goals. Now is the time for the UK to show leadership ahead of COP 26, boosting jobs, skills and supply chains, and building firm foundations for a greener, more inclusive future.

Please contact juliet@theeeig.co.uk and sarah@theeeig.co.uk to discuss these recommendations further.

February 2021

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Table 2: A litmus test for net-zero: evaluating government action against EEIG priorities with a focus on energy efficiency

EEIG'S CORE ASKS OF UK GOVERNMENT	SEPTEMBER 2019	SEPTEMBER 2020	JANUARY 2021
Governance: Energy efficiency must be designated a national infrastructure investment priority. It must include the Government's target for all low-income homes to be at least EPC C by 2030 and bring the target for all other homes forward from 2035 to 2030 to align it the statutory net zero target. It needs to be driven by a comprehensive and long-term programme with dedicated governance mechanisms and set out a trajectory for continued improvement until all homes are fully decarbonised by 2050.	The Government had set the target to get all homes up to EPC C by 2035 but not yet designated energy efficiency as an infrastructure priority, nor set up a dedicated body to oversee a long-term programme.	Energy efficiency has not yet been designated an infrastructure investment priority, nor have bodies been assigned to oversee a long-term programme. The net zero target means the EPC C target needs to be brought forward to 2030 to ensure the UK gets on track.	Additional targets and policies have been set out in the Ten Point Plan and Energy White Paper – including a new target to install 600,000 heat pumps by 2028 – although these still fall short of EEIG's analysis of what is needed to get on track for net zero. The forthcoming Heat and Buildings Strategy should set out the vision and roadmap for 2030, aligned with the CCC's 6th Carbon Budget and the UK's new NDC, targeting a 68% reduction in GHG emissions by 2030 – updating targets to match. Energy and heat policies must be joined up. The new National Infrastructure Bank must have a remit to support decarbonisation of homes from its launch in April 2021.
Ring-fenced additional public capital investment averaging £1.8 billion per year to 2030, bringing the total investment funded from public budgets and household energy bills (via the Energy Company Obligation) to £2.5 billion, deployed to fully support low-income households and incentivise a further £4.8 billion of private investment from landlords and those able to pay. A plan to raise a total investment (private and public) of £7.3 billion per year to 2030 is needed.	Almost no additional funding had been allocated to residential energy efficiency since public investment was halved compared to 2012.	The £1.5 billion Green Homes Grant stimulus constitutes a large new investment, but public capital commitments need sustaining beyond March 2021, accompanied by a long-term investment plan. The accompanying £0.5bn Local Authority Delivery scheme also needs to sustaining beyond March 2021. The initial £50m from the £3.8bn Social Housing Decarbonisation Fund needs to be ramped up quickly. On the assumption that two thirds of these new funds go towards energy efficiency (the remainder to low carbon heat), an additional £7.8bn for the remaining 4 years of this Parliament, an average of £1.95bn per year, is still needed.	The 10-point plan extended and rolled over the £1.5bn Green Homes Grant until March 2022 and the Local Authority Delivery scheme until December 2021. The Autumn Spending Review provided £530m additional investment for able to pay and low-income households, falling short of EEIG annual investment calculations. Additional 2021 funding is needed from the Budget, and multi-year funding set out in the Comprehensive Spending Review – fulfilling the Conservative Manifesto spending commitments. On the assumption that two thirds of these new funds go towards energy efficiency (the remainder to low carbon heat), an additional £7.4bn for the remaining 4 years of this Parliament, an average of £1.85bn public funds per year, is still needed.

EEIG'S CORE ASKS OF UK GOVERNMENT

SEPTEMBER 2019

SEPTEMBER 2020

JANUARY 2021

Proper incentives for the 'able to pay' market to thrive and unlock the £4.8 billion of private investment needed. This should include a Stamp Duty incentive, zero interest loans and incentives to pump-prime demand for green finance where needed as recommended by the Green Finance Institute.

No incentives had been introduced to help homeowners improve energy efficiency.

The Green Homes Grant includes a welcome incentive for the 'able to pay' but must form part of a suite of evolving incentives that leverage increasing amounts of private finance beyond the scheme's end in March 2021. On the assumption that half of the Grant's funding goes to able to pay households, and two thirds of these new funds go towards energy efficiency (the remainder to low carbon heat), an additional £3.3bn for the remaining 4 years of this Parliament, an average of £825m per year, is still needed – with the level of subsidy offered to individual able to pay households tapering over time.

and topped up with £320m, in the scheme to be extended for the introduction of a suite of structural incentives designed Stamp Duty linked to energy **National Infrastructure Bank** assumption that half of the Grant's funding goes to able to pay households, and two thirds of these new funds go towards energy efficiency (the remainder to low carbon heat), an additional £3.2bn for the remaining 4 years of this Parliament, an average of £800m per year, is still needed offered to individual able to pay households tapering over

Using regulation to set minimum standards and reduce costs, by tightening rented sector regulation over time to an EPC rating of C by 2030, the eventual introduction of a mandatory minimum EPC rating for owner-occupied homes at point of sale, and ensuring newly built homes are zero carbon across all energy uses in their operation and climate-resilient from 2030 at the latest.

Government had confirmed regulation to prevent private rental of homes with EPC ratings of F or G and plans to raise ambition through Minimum Energy Efficiency Standards (MEES) for the Private Rented Sector (PRS). There were no plans for minimum standards for owner-occupied homes. It had announced its intention to ensure new homes are supplied with non-fossil heat from 2025...

Regulation to forbid private lettings of homes with EPC ratings of F or G has come into force. The publication of plans to raise this standard to EPC C by 2028 is welcome, and Government intends to publish similar plans for social housing. There are still no plans for minimum standards for owner-occupied homes. It has consulted on the Future Homes Standard, which should be phased in early and strengthened.

BEIS has proposed tightened MEES standards for the PRS sector, and is looking to roll out regulation for lenders' on disclosing the EPC performance of their mortgage portfolios. This is welcome and necessary, and we encourage BEIS to continue extending MEES into all tenures, particularly the owner-occupied sector. A new consultation on policies to drive energy efficiency improvement in the owner-occupied sector, expected later this year, is welcome. We encourage the Future Homes Standard to be phased in from 2023. The Heat and Buildings Strategy should set out a vision and roadmap for 2030, including a timeline for phasing out fossil heating, and enshrining a fabric first principle.

EEIG'S CORE ASKS OF SEPTEMBER 2019 **SEPTEMBER 2020 JANUARY 2021 UK GOVERNMENT** A long-term, fair and local Government had not set out delivery programme similar any plans to implement a to Scotland's – which places local authority-led delivery into a local authority-led local authorities at the heart delivery programme. We programme. of delivery through area- or locally-based renovation to consult on "zoning" as schemes, local heat and energy efficiency plan development, local jobs and supply chains, localised and personalised advice services, and an integrated approach to energy efficiency and heat that prioritises low-income households. National Infrastructure Bank Local and long-term The Government had renovation advice, ended the Energy Saving regression on standards as alongside full adoption Advice Service, not set up of the independent Each any independent advice Home Counts and Hackitt centres at local level and reviews' recommendations the Each Home Counts to ensure informed consumer review's recommendations choice backed by the highest had not yet been practically quality and safety standards. rolled out. The Hackitt plan to scale up skills and Review had reported and supply chains is required, an implementation plan was published. to support **high-quality**