

White Paper

# From Warm Front to Warm Homes

17 lessons learnt from 25 years of energy efficiency policy



# Contents

About Cotality ..... ii

Executive Summary ..... 3

Policy Summary ..... 4

    Warm Front (2000–2013)..... 5

    Energy Efficiency Commitment (EEC) (2002–2008) ..... 5

    Landlord’s Energy Saving Allowance (LESA) (2004–2015) ..... 6

    Energy Performance Certificates (2007-) ..... 6

    Carbon Emissions Reduction Target (CERT) (2008–2012) ..... 7

    Community Energy Saving Programme (CESP) (2009–2012)..... 7

    Energy Company Obligation (ECO) (2013–Present) ..... 8

    Green Deal (2013–2015, with limited legacy support afterward) ..... 8

    Green Homes Grant (2020–2021)..... 9

    Minimum Energy Efficiency Standards (MEES) (2018-) ..... 10

Lessons learnt ..... 11

Recommendations ..... 17

## About Cotality

Cotality UK supports the housing sector, delivering surveying and workflow technology, combined with data and analytical insights. The markets we serve include Mortgage Finance, Property Surveying, Residential Estate Agency, Insurance and Retrofit. Our solutions help clients to streamline operations, improve performance, make smarter decisions and mitigate property related risk.

Everything we do is in-house, from our innovative software development to our dedicated Client Support Services. We strive to deliver exceptional service and value, working in an agile environment and in collaboration with our clients. We address challenges and act quickly to present innovative and cost-effective technological and data driven solutions.

In the Retrofit Sector we:

- Provide software and services that support over 70% of funded retrofit works
- Advise landlords of 2 million homes, including National Trust and many Registered Providers
- Support energy suppliers, covering the majority of households, with their ECO management
- Provide analysis to support policy development, with past clients including DESNZ, the Climate Change Committee, Local Government Association and the National Housing Federation

# Executive Summary

Over the past 25 years, the UK has implemented a wide range of policies and programmes to drive energy efficiency across the built environment. From the early rollout of Energy Performance Certificates (EPCs) to successive schemes such as the Green Deal, ECO, and the Minimum Energy Efficiency Standards (MEES), these interventions have shaped landlord behaviour, consumer awareness, and the evolution of energy services.

This white paper draws on a quarter-century of insight from our experience delivering energy efficiency software and services. We have identified the most significant lessons learned – both in terms of successes and systemic challenges – and get into the detail to identify options to address ongoing barriers to retrofit delivery.

None of these 17 lessons stands alone. Whole system thinking is needed. Too many policies have had a narrow focus, and do not address the known, inter-related barriers. Delivering net zero demands a broader approach addressing financial and non-financial barriers.

As the UK looks toward its net zero goals and the full Warm Homes Plan, this paper argues that the next generation of energy efficiency policy must be smarter, more coordinated, and grounded in the hard-won insights of the past. It must also embrace digitalisation not just as a delivery mechanism, but as a driver of continuous improvement, equity, and accountability.

We conclude with three questions for policy-makers to support the design of more effective, durable, and data-informed energy efficiency strategies – rooted in what has been learned on the ground, in the field, and at the interface between policy and people.

Focus on success – is the policy trying to deliver too much?

Keep it simple – will the policy build consumer confidence?

Support market acceleration – will the policy encourage private sector investment?

# Policy Summary

Our lessons for policy-makers are drawn from supporting the delivery of multiple programmes over the past two decades. These were designed to encourage uptake of energy efficiency in homes, but results were mixed.

The summary below provides a high-level chronology of the key policies, programmes and regulatory frameworks that have defined the sector, and is followed by a more in-depth look at each initiative's aims and impact before we turn to the lessons learned from experience.

Initiative	Timeframe	Target Group	Main Measures	Approach
<b>Warm Front</b>	2000–2013	Low-income individuals	Heating & insulation	Government grants
<b>EEC</b>	2002–2008	All households, focus on vulnerable groups	Insulation, efficient appliances	Energy supplier-funded
<b>LESA</b>	2004–2015	Landlords	Tax relief for specific energy efficiency measures	Tax deduction of up to £1500 per dwelling
<b>EPCs</b>	2007–	The property market	An energy performance rating for every home marketed for sale or rental	A standardised method for assessment and presentation, with data captured on a central register.
<b>CERT</b>	2008–2012	General households, 40% priority for low-income	Insulation, appliances, heating	Supplier-funded with carbon reduction targets
<b>CESP</b>	2009–2012	Deprived communities	Whole-home energy upgrades	Area-based, supplier & local council partnerships
<b>ECO</b>	2013–Present	Low-income & eligible households	Insulation, heating, whole-house retrofits	Supplier-funded, ongoing scheme
<b>Green Deal</b>	2013–2015	Homeowners & landlords	Insulation, boilers, efficiency upgrades	Loan scheme, repaid via energy savings
<b>Green Homes Grant</b>	2020–2021	Homeowners	Insulation and low carbon heating	Vouchers for homeowners, with more available to low income households
<b>MEES</b>	2018–	Landlords	Minimum Energy Efficiency Standard of EPC Band E	Prohibits letting of homes below EPC Band E, with exemptions



## Warm Front (2000–2013)

### Objective:

To provide grants for low-income households to improve heating and insulation, reducing fuel poverty.

### Key Features:

- Targeted at vulnerable households (e.g., low-income families, elderly, disabled individuals).
- Covered costs for insulation (loft, cavity wall) and heating system upgrades (e.g., new boilers, central heating).
- Grants were up to £3,500 (£6,000 in off-gas areas).
- Independent assessment of the property and its eligibility for funding.
- Administered by energy suppliers but funded by the taxpayer.

### Impact:

- Helped over 2 million households.
- Criticised for bureaucratic delays and eligibility restrictions, leading to inefficiencies.
- Phased out in 2013 and replaced by the Energy Company Obligation (ECO).

## Energy Efficiency Commitment (EEC) (2002–2008)

### Objective:

To mandate energy suppliers to fund energy efficiency improvements in homes, reducing carbon emissions.

### Key Features:

- Required energy suppliers to achieve savings by promoting measures like insulation and energy-efficient appliances.
- Focused on low-income households and social housing.
- Split into EEC1 (2002–2005) and EEC2 (2005–2008) with increasing carbon reduction targets.

### Impact:

- Led to insulation and appliance upgrades to approximately 6 million homes.
- Successfully reduced household carbon emission by around 16 million tonnes.
- Replaced in 2008 by the Carbon Emissions Reduction Target (CERT).

# Landlord's Energy Saving Allowance (LESA) (2004-2015)

## Objective:

To incentivise private landlords to install energy efficiency measures by offering a tax deduction.

## Key Features:

- Allowed landlords to deduct up to £1,500 per property per year from rental income for installing certain energy-saving measures.
- Eligible improvements included loft insulation, cavity wall insulation, draught-proofing, and hot water tank insulation.

## Impact:

- Provided a simple fiscal incentive for early-stage energy improvements, benefitting landlords with smaller portfolios or lower annual taxable profits.
- In the 2007–08 tax year, only 0.2% of UK landlords<sup>1</sup> utilized the allowance.
- Low uptake was attributed to limited awareness, modest awareness and lack of requirement.

# Energy Performance Certificates (2007-)

## Objective:

To provide a standardised measure of a building's energy efficiency and inform property owners, tenants, and buyers of likely energy costs and improvement options.

## Key Features:

- Mandatory energy performance rating for homes sold or let, introduced in 2007 under the EU Energy Performance of Buildings Directive.
- Rates properties on an A–G scale (A = most efficient) and includes cost-effective recommendations based on a simplified dataset and method.
- Data captured in a central register (England & Wales, with data for Scottish homes held separately).

## Impact:

- Created a consistent, accessible benchmark for energy performance.
- Widely adopted but criticised for accuracy.
- Became the basis for other policies including grant funding eligibility and MEES.

---

<sup>1</sup> Association for the Conservation of Energy (ACE) evidence to the Energy and Climate Change Committee, 2012, [http://www.publications.parliament.uk/pa/cm201012/cmselect/cmenergy/1744i\\_ii/1744we12.htm](http://www.publications.parliament.uk/pa/cm201012/cmselect/cmenergy/1744i_ii/1744we12.htm)

# Carbon Emissions Reduction Target (CERT) (2008–2012)

## Objective:

To further reduce household carbon emissions through energy supplier obligations.

## Key Features:

- Expanded on EEC by setting higher carbon reduction targets.
- Energy suppliers were required to fund loft and cavity wall insulation, energy-efficient boilers, and lighting upgrades.
- At least 40% of measures had to be delivered to priority households (low-income or vulnerable people).
- Allowed promotion of consumer energy-efficient products (e.g., subsidised CFL bulbs).

## Impact:

- Delivered over 3.5 million insulation installations.
- Reduced annual household energy bills by approximately £50 per home.
- Criticised for excessive focus on free light bulbs rather than deep home improvements.
- Replaced by ECO (2013).

# Community Energy Saving Programme (CESP) (2009–2012)

## Objective:

To deliver whole-house energy efficiency upgrades **in** low-income, high-deprivation areas.

## Key Features:

- Area-based approach (unlike CERT, which was household-specific).
- Required energy suppliers and local authorities to work together on home upgrades.
- Provided solid wall insulation, double glazing, efficient heating systems, and other major improvements.
- Focused on delivering comprehensive, long-term efficiency gains.

## Impact:

- Helped over 90,000 households, mainly in deprived areas.
- Provided deeper retrofits than CERT but had high administrative costs.
- Ended in 2012, with ECO incorporating some of its principles.

# Energy Company Obligation (ECO) (2013–Present)

## **Objective:**

To improve the energy efficiency of homes, particularly for low-income and vulnerable households.

## **Key Features:**

- Funded by energy suppliers, with a legal obligation to provide efficiency measures.
- Initially focused on low-income households but expanded to include more homes over time.
- Covered insulation, boiler replacements, heating systems, and solid wall insulation.
- ECO1 (2013–2015), ECO2 (2015–2018), ECO3 (2018–2022), ECO4 (2022–2026) – each phase tightened requirements.
- ECO4 (current phase) focuses more on whole-house efficiency improvements rather than individual measures.

## **Impact:**

- Helped around 2.5 million homes reduce energy bills and carbon emissions.
- Criticised for slow rollouts and complex eligibility criteria.
- Remains a key part of the UK's Net Zero strategy.

# Green Deal (2013–2015, with limited legacy support afterward)

## **Objective:**

To allow homeowners to make energy efficiency improvements without upfront costs, repaying costs through energy bill savings.

## **Key Features:**

- Provided loans for insulation, new boilers, and other efficiency upgrades.
- Loan repayments were tied to energy bill savings ("Golden Rule" – expected savings should cover repayments).
- Available to homeowners, landlords, and tenants.

## **Impact:**

- Had low uptake (only around 15,000 households signed up).
- Criticised for complex applications, high-interest rates, and administrative failures.
- Scrapped in 2015, but some private finance schemes continued under the Green Deal Finance Company.



# Green Homes Grant (2020-2021)

## Objective:

The Green Homes Grant was launched by the UK Government in September 2020 with the aim to increase uptake of energy efficiency, reduce carbon emissions and support green jobs and stimulate the economy following COVID-19.

## Key Features:

- Vouchers for homeowners (including landlords) to install energy-saving measures, offering £5,000 for most households and £10,000 for low income households.
- Covered primary measures (like insulation and low-carbon heating) and secondary measures (like windows and controls), delivered by TrustMark-registered installers.
- Initially intended to run for 6 months, later extended, but closed early in March 2021 due to delivery issues.

## Impact:

- Low uptake relative to expectations: only around 47,500 vouchers redeemed by the time of closure.
- Delivery was hampered by complex application processes, shortage of accredited installers and delays in voucher issuance and payments.
- While it raised awareness of retrofit, it fell short of its goals. Originally aimed to improve 600,000 homes, it delivered improvements to fewer than 50,000.
- Criticised by the National Audit Office<sup>2</sup> and Environmental Audit Committee<sup>3</sup> for poor design and execution.

“The aim to achieve immediate economic stimulus through the Green Homes Grant voucher scheme meant that it was rushed. As a result, its benefits for carbon reduction were significantly reduced and ultimately, it did not create the number of jobs government had hoped for.

“Decarbonising our homes is a key element of the government’s net zero strategy. It is vital that future schemes learn from this experience.”

## Gareth Davies, the head of the NAO

<sup>2</sup> NAO, 2021, [Green Homes Grant Voucher Scheme - NAO report](#)

<sup>3</sup> EAC, 2021, [Green Homes Grant voucher target would take over 10 years to meet - Committees - UK Parliament](#)

# Minimum Energy Efficiency Standards (MEES) (2018-)

## **Objective:**

To prevent the least energy-efficient buildings from being let, thereby improving the overall energy performance of the rental stock and reducing fuel poverty.

## **Key Features:**

- Came into effect in 2018 to prohibit landlords from letting properties with an EPC rating below E.
- Initially applied to new tenancies (2018), extended to existing tenancies in 2020.
- Includes exemptions (e.g., high-cost improvements or third-party consent not given).
- Enforced via local authorities; non-compliance can lead to fines of up to £5,000.

## **Impact:**

- In 2019, the English Housing Survey estimated around 4% private rented homes had EPC ratings of F or G.
- By 2022, that percentage had fallen to around 2.7% — indicating that over 60,000 homes had likely been improved in response to MEES.

# Lessons learnt

## 1. The selling point comes from the service, not the finance

The positives of the Green Deal – and there were some – were overshadowed by an unattractive financial offer and no public engagement on the benefit of energy efficiency.

Even if finance is attractive, people pay attention to finance offers not just because of a low interest rate, but because they like the idea of the product. A 0% interest offer will only attract someone already considering a sofa, for example.

▼ Clarity is needed on what is required from the UK housing stock, to instill urgency into the market and bring demand, and savings, forward.

This is why the Government's planned public engagement strategy is so vital, and needs to be embedded in communications from across Whitehall – clarity is needed on what is required from the UK housing stock, to instill urgency into the market, avoid reliance on standards alone and bring demand, and savings, forward.

## 2. Penalise bad practice

The standout line in the ECO4 consultation was footnote 37<sup>4</sup>: “Of the boilers installed under ECO3 to date, 75% replaced boilers installed under ECO1 and 21% under ECO2.”

This means energy billpayers' money was spent replacing 'efficient' condensing gas boilers, which have a 12-year lifespan, after only 3-8 years.

Accreditation Schemes can't access the data necessary to spot these patterns let alone penalize bad practice. This is due to data silos between Schemes. This needs urgent attention from government as part of the current Energy Performance of Buildings review, alongside the level of audits and penalties applied.

## 3. Low hanging fruit has been picked

Anecdotally, during the years of CERT, CESP, and Warm Front, there was plenty of profitable work, with certainty in supply that supported the employment of in-house quality-controlled staff. Now, the remaining lofts and cavities are hard to find, access, or are more technically challenging.

The resultant risk and uncertainty in the supply chain encourages installers to rely on subcontractors and pushes up pricing. This is not sustainable.

Instead, the government needs to assess which homes still haven't had basic measures, and how to engage them. If owners are not taking up free measures, non-financial incentives are required.

---

<sup>4</sup> UK Government, 2021, [Energy Company Obligation ECO4: 2022 - 2026](#), p49

#### 4. **Clarity on what matters**

In this year's consultation on Energy Performance of Buildings reform<sup>5</sup>, the government has proposed inclusion of four measures of performance in Energy Performance Certificates. These risk confusion and a greater challenge for Accreditation Schemes and auditors – at a time when the sector, from homeowners to the supply chain, needs clarity and improved quality control.

#### 5. **Track progress, and feed it back to the market**

At the end of CERT, in 2012/13 Citizens Advice called for a single database to avoid duplicate claims. Previously, measures were recorded on a form filled in by the installer, with minimal audits.

Data is still held in multiple places. The TrustMark data warehouse doesn't include work done under Warm Front, EEC, CERT, CESP, and early ECO. This may be held by Ofgem and could prove valuable in avoiding unnecessary efforts to engage homeowners.

TrustMark's data warehouse holds more recent improvements under PAS2035 or Licence Plus, but there's no link to update the EPC database, despite the work being evidenced. This means data isn't available for suppliers to plan their obligations, for local authorities to optimize Warm Homes Local Grant engagement, or for homeowners' and landlords' advice services.

#### 6. **We cannot manage what we cannot measure**

Building owners across the UK, whether individual or landlords, do not have a right to the detailed data captured in the EPC surveys and PAS2035 works that they pay for; and local authorities do not have a right to data on tenure, landlords or EPC detail.

Following legislation last summer, landlords, owners and residents can access data via the Accreditation Schemes, but costs differ significantly on the arbitrary basis of who did the original survey.

Concurrently councils are expected to identify and engage homes in need and to enforce energy efficiency standards, and Government is applying obligations on energy suppliers to deliver works.

Additionally, five-year mortgage products originated today will still be within their fixed terms in 2030. Lenders require data and clarity on the proposed Minimum Energy Efficiency Standards (MEES) in order to inform their decisions today, or such products will face too much risk.

Decarbonisation cannot be achieved efficiently when the key agents are operating in the dark. MHCLG is considering greater data access, with the Energy Performance of Buildings consultation signaling a change so that the Sec of State can set who has access, but there is no firm date to systems being in place and Cotality thinks government could go significantly further, as set out overleaf.

---

<sup>5</sup> UK Government, 2024, [Reforms to the Energy Performance of Buildings regime - GOV.UK](https://www.gov.uk/government/consultations/reforms-to-the-energy-performance-of-buildings-regime)

## Data sharing to reduce search and compliance costs

Energy performance data captured in relation to government policy is currently stored by multiple organisations in multiple places, and not being put to use. The government could reduce the cost of retrofit programme design and delivery by making the following data available to the market:

- Data from assessment surveys and works completed under previous government programmes, which did not require registration of the data on the EPC register. Too much time and money is spent by local authorities and landlords trying to collate data that has been collected and evidenced under government-backed schemes.
  - 3.5 million homes received improvements under CERT (2008-12), though we note this was predominantly lightbulbs.
  - 90,000 homes received upgrades under CESP (2009-2012).
  - Early ECO rounds upgraded around 2.5 million homes.
  - 1.4 million households have solar panels, mostly installed in the past decade which means the EPC register is significantly out-dated, despite their registration with the government-backed MCS.
- Incorporating data from assessment surveys and works completed under PAS2035 where a Retrofit Coordinator oversees and evidences works. The government permitted these updates under the Green Deal framework. Delivery schemes lodge completed PAS2035 works on TrustMark, for a fee, but this is not available to the homeowner or their advice services. The government needs to clarify rights to this data.
- Data sourced from warranty schemes.
  - NHBC holds registers for around 80 per cent of the new homes warranty market. This could help identify the 2.3 million homes that were built after 1983 with clear, unfilled cavity walls.<sup>6</sup>
  - Similarly, CIGA and other warranty providers hold data on energy efficiency measures registered as part of government-backed delivery schemes.
- Building Control, potentially as part of wider digitalisation activity.
- EV chargers funded by government.
- Smart meter installations from energy suppliers.
- Gas Safety Check reports on boiler make and models.

<sup>6</sup> Filling the Gaps, January 2012, Consumer Focus, link [here](#)

## 7. Policy landscape needs carrots and sticks

A variety of financial incentives has been attempted over the years, but have not in themselves delivered the scale of change required. These have included grant-funding, loans, tax relief and a VAT reduction.

For landlords handling a portfolio of properties, financial incentives are balanced against not only the costs of retrofit but also demands from repair and maintenance programmes and the potential costs and benefits of other investments.

Legal targets cut through and get retrofit to the top of the agenda: the Clean Growth Strategy targets (ie EPC C) have been driving investment amongst our public and private sector clients since 2017. Action may accelerate once the standards, and their enforcement, are clarified but the commercial benefit – the carrot – also needs to be clear.

## 8. Targeted support means well but can raise cost and communication barriers

The targeting of measures to certain households and/or properties can reduce take-up, because many of those in greatest need are also hardest to reach and engage, distrust or cannot cope with related information or administration.

Would it be better to cast the net wider, and make the process easier for people to navigate?

The eligibility barrier runs from initial market analysis through to the paperwork required. Our software helps local authorities and housing associations identify potentially eligible homes, but can only do that at low cost where policy targets are framed in terms of data available for use by us and our clients.

It appears that a more efficient approach would be to simplify eligibility criteria, making it easier both for delivery partners to process and vulnerable households to understand and apply.

## 9. Does local knowledge equate to efficiency?

CESP was a supplier obligation with local authority leadership of schemes. Anecdotally this was challenging for suppliers as they lost control of how to deliver their obligation and had to manage uncertainty across multiple council areas and schemes. More recent funding has been delivered through local authorities, which has seen some step up to innovate and deliver, while others are held back by more pressing local matters.

But, while it has economies of scale and a level playing field on its side, centralisation has its own challenges.

Under Warm Front and CERT, if an installer got a lead, it was sent to EAGA who then did the assessment and eligibility check before returning the lead. This delivers the independence that is sometimes missing in schemes today but, anecdotally, EAGA didn't always send the leads back to the source installer, and often sent them out infrequently, in large batches, causing problems for the supply chain.

Such issues can now be managed with services like Cotality's PAS hub workflow software, which supports both national and local delivery. This leaves the risk of a postcode lottery as the greatest challenge for this policy question.



## **10. Energy efficiency is a core element of low carbon heating**

Energy efficiency and demand reduction reduce the installation, running cost and system costs of low carbon heating.

Support for the latter must also be open to the former so that technologies, systems and trades can compete on a level playing field. The efficiency of heat pumps is making great strides but that does not mean that energy is not being wasted.

## **11. Energy pricing sends the wrong message**

There are several policy options available to rebalance energy pricing to support the electrification of heat, such as rising block tariffs, rebalancing policy costs or ending standing charges. Energy pricing should reflect the whole cost of a fuel, but Cotality understands that any change to energy tariffs could require support for some vulnerable consumers – whether that is additional help with bills or to transition to lower carbon heating.

## **12. High standards can cut costs**

The Future Homes Standard is a good start, but the U-turn on zero carbon homes has lost the sector ten years of skills and supply chain development. We need more ambition, and the inclusion of on-site renewables and embodied carbon targets to develop the skills and supply chain that will be required across the whole housing stock in time.

## **13. Innovation funds should support not lead government policy**

The most effective policies in the past fifteen years have been product policies and the feed-in tariff. These provided clear frameworks for markets to innovate, rather than giving competitive advantages to a few winners.

As much as Cotality has benefitted from innovation funds, such as the Green Home Finance Accelerator, longer-term market-wide policies and public engagement would provide a firmer basis for both consumer and supplier confidence.

## **14. Policy longevity and stability matter**

Short-lived or abruptly withdrawn schemes (e.g. Green Deal, Green Homes Grant) undermined industry confidence and consumer uptake, further highlighting the importance of consistent, long-term policy frameworks.

The Green Homes Grant is a particularly good example. It was evident from the outset that it would be short-lived, due to the ambition, funding and new entrants involved. Quality and efficiency require long-term commitment, comprehensive audit trails and tailored advice that avoids surprises when it comes to install. Government needs to focus interventions to reward market participants whose strength is quality delivery rather than their agility in response to short-term announcements.

## **15. Trigger points are being missed**

Opportunities to improve energy efficiency in owner-occupied homes are being missed. The trigger points for retrofit investment are well understood, but homeowners are still not prompted to consider energy efficiency options as part of wider renovation conversations.

Prompts could be built in to building control and the sales market, through information provision, accreditation for whole house advice, fiscal incentives as well as MEES.

Data also matters. With services like ours, the feedback loop is improving – from engagement to advice, to delivery, and back to housing stock datasets for use by the public and private sector. This now needs to extend – Building Control, TrustMark and the property market all hold data and trigger points that could inform and support the engagement of homeowners in retrofit. With no clear commercial benefit to making that link while uptake is largely limited to ‘pioneers’, government should consider how to build awareness or otherwise incentivize renovators to take up energy efficiency advice – before the opportunity is lost.

## **16. An emergency requires urgency**

The supply side cannot create the retrofit market alone. Demand remains limited, healthier homes are desirable but there is a lack of urgency. Early adopters, from individuals to large landlords, should be rewarded.

Retrofit can be a hassle, but it offers significant long-term benefits: saving a tonne of carbon this year through energy efficiency is worth ten tonnes saved in 2035, with additional bill savings and health benefits. The feed-in tariff had urgency built in, with early applications rewarded with a higher tariff. This should be given consideration in other policies, identifying where risks related to uncertainty are offset by the benefit of the clear behavioural nudge.

## **17. The climate is changing**

Our homes will face additional pressures, such as staying cool in higher temperatures, staying warm if the jet stream collapses, or managing changes in rainfall.

Cotality supports the Committee on Climate Change’s recommendation that homes must be resilient, and now offers climate risk data for every home. The sooner we incorporate overheating risks and water efficiency into the EPC dataset and renovating UK homes, the better.

# Recommendations

Our lessons from the energy efficiency frontline are at times down in the detail, but we have seen policies fail where they have failed to understand the importance of these foundations. The feed-in tariff was not initially tied to market prices; the Green Deal was centred on finance alone, rather than a holistic service to build consumer confidence; and the Green Homes Grant offered more than the market could deliver in the timescale.

Our practical recommendations point to more effective, durable, and data-informed energy efficiency policy. Rooted in what has been learned on the ground, in the field, and at the interface between policy and people. Fundamentally, across this detail we have seen policies lose sight of what they aim to achieve. And so we ask policy-makers to assess options against three questions:

1. Focus on success – is the policy trying to do too much?
  - a. EPC reform must empower participants in the property market
  - b. MEES regulations must work with buy-to-let finance, so lenders can manage associated risk
  - c. Warm homes are delivered by fabric improvement, decarbonised homes are delivered by low carbon heating and solar PV/battery
  - d. Low trust requires tailored, independent advice and installation oversight
  - e. Remove data barriers that place friction on key actors, including Accreditation Schemes, local authorities and lenders.
2. Keep it simple – will the policy build consumer confidence?
  - a. A public engagement campaign that talks to voters/homeowners/landlords' interests and makes use of trigger points within government control
  - b. EPCs with relevant, straightforward and comparable performance metrics
  - c. Reassess how to engage the most vulnerable households
  - d. Long-term policy framework over short-term innovation funding, to enable private sector investment and support consumer confidence
  - e. Embed quality control to drive improvement in the supply chain
  - f. Invest in incentives that communicate urgency to bring forward demand.
3. Support market acceleration – will the policy encourage private sector investment?
  - a. Enable a competitive, national quality assured market alongside targeted local funding to avoid a postcode lottery
  - b. Give fabric performance improvements comparable support to that available to heat pumps
  - c. Revise energy pricing so that low carbon heating does not face the communication barrier of greater cost
  - d. Carrots alongside sticks

Cotality helps clients navigate their retrofit journey and the technical and policy challenges – such as those above – that they encounter along the way.

We're the only holistic data, insights and workflow solutions provider for the retrofit sector – serving the public and private sector, from lenders to contractors, from homeowners to the largest landlords, and from SMEs to national governments.

We bring the data integrity, flexible solutions and reliable platforms that policy-makers, programme planners and project managers need.

Get in touch to stay agile with a single source of truth on homes and projects, and powerful tools to drive action as the market evolves.

[cotality.com](https://cotality.com)

### **Surveys & Compliance**

Whether you need EPCs, a standard assessment from a qualified Retrofit Assessor or a 3D model you can revisit, we can help with our national panel of surveyors, our retrofit coordinators or software for use by your team.

### **Stock Analysis**

Our powerful software – used by lenders, landlords and local authorities – assesses the latest housing data to assess risk, need and opportunity against your targets, whether SAP, carbon, cost or fabric performance based.

### **One Stop Shop**

Cotality's One Stop Shop Services make retrofit desirable, achievable and reliable. Our service supports homeowners and landlords from assessment to completion – ensuring compliance, quality, and efficiency every step of the way.