



The Recognised Trade Association for the  
UK External Wall Insulation Industry

# WHY FABRIC FIRST IS RIGHT

# Why Fabric First Still Matters

*In these days of increased tensions and pressure over fuel security and rising fuel poverty, adopting a fabric first approach remains a sensible strategy for a fundamental reason: the most affordable, clean, and dependable energy is the energy you never have to use.*

*All other solutions—such as heat pumps, solar panels, batteries, and smart controls—perform more efficiently after the building envelope has been properly addressed, and energy demand reduced.*

*A fabric first strategy, which focuses on insulation, airtightness, and minimising thermal bridging, remains the most economical and future proof method to decrease energy demand, lower emissions, and enhance comfort, regardless of technological advancements.*

*Energy prices may vary, but insulation remains unaffected by these fluctuations.*

- *Reducing heat loss by 30–60% delivers predictable, locked in savings.*
- *Even if energy prices decrease, the benefits persist.*
- *If energy costs rise, you are protected.*

*Implementing a fabric first approach correctly provides:*

- *Fewer cold spots*
- *More stable indoor temperatures*
- *Reduced condensation and mould*
- *Quieter interiors*
- *Improved summer comfort (with appropriate design)*

*Comfort represents a quality of life improvement, not merely an energy efficiency upgrade.*

*Improved fabric results in:*

- *Smaller heat pumps*
- *Reduced radiator or underfloor heating requirements*
- *Smaller photovoltaic arrays needed to offset demand*
- *Reduced battery storage*
- *Less dependence on complicated controls.*

*A fabric first approach aligns with building physics and reduces energy demand to a level where electrification of heat makes sense in terms of running cost and national capacity.*



**Colin King**

## Colin King Bio

Through his own consultancy CKC, Colin provides technical support to housing providers, and government on hard-to-treat (HTT) buildings, working in particular with DESNZ on the decarbonisation of social housing and MHCLG where he delivered a review of the Housing Health and Safety Rating System on housing standards in the rented sector.

A former director at BRE where he led work on retrofit energy performance and hydrothermal analysis, Colin currently sits on the Retrofit Task Force, Chairs CB401 for the BSI on new Energy Standards and BS5250 Management of Moisture in Buildings Steering Groups for Part C, F and L of the Building Regulations in England and Wales. He also acts as Expert Witness, trains Retrofit Co-Ordinators, provides technical support to warranty providers and remains active across numerous other leading technical and research groups.

## The recognised trade association for the External Wall Insulation (EWI) industry in the UK

Representing members of the External Wall Insulation industry for over 40 years, through technical excellence, education, effective collaboration, strong marketing, communications, and member benefits.



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### Why fabric first is right

#### INTRODUCTION

Retrofitting Britain's housing stock is a climate change imperative and a public health emergency. This paper sets out the scale of the challenge, and the evidence that the best way to tackle both problems is to take a fabric first approach, particularly in government mandated and funded programmes.

Making homes more energy efficient and therefore cheaper to heat is both healthier for residents and better for the environment, and will save billions of pounds that would otherwise be spent on NHS treatment, welfare payments, heating bills and lost opportunity. Pursuing carbon reduction alongside energy efficiency will tackle fuel poverty and climate change simultaneously.

The high price of electricity means that low carbon heating technologies, such as heat pumps, can be more expensive to run than a gas boiler. Simply changing the heating system will not improve the lives and health of residents if they still cannot afford to heat their home. Energy efficiency programmes must continue to prioritise fabric – and the single most impactful fabric improvement is insulation.

Government research finds that the most effective single retrofit measure for improving a building's energy efficiency is solid wall insulation, especially when installed alongside measures like heat pumps and solar panels. When designing schemes which support retrofit, particularly for low income households, government should be considering a holistic approach which will have the widest impact and the largest payback.

*“The best path toward sustainability for low-income households has to be a fabric first – insulation, insulation, insulation – approach”*

Committee on Fuel Poverty

**“SWI is therefore the most impactful measure and saves more energy than all other measures combined”**

Demonstration of Energy Efficiency Potential study, DESNZ<sup>1</sup>

***This report is dedicated to the memory of Derek Gray 1959-2025***  
*INCA Director, Scottish Chair and lead voice for stakeholder engagement.*  
*A relentless campaigner and passionate advocate for the EWI industry.*

<sup>1</sup> [https://assets.publishing.service.gov.uk/media/671f61e4ae0462c448fc4074/1.\\_DEEP\\_Synthesis\\_Report.pdf](https://assets.publishing.service.gov.uk/media/671f61e4ae0462c448fc4074/1._DEEP_Synthesis_Report.pdf)

## Summary

Britain's housing stock is old, carbon intensive and poorly insulated. This old and low quality housing stock is making too many people poor and ill, and contributing to excess winter deaths.

Fixing this problem will have billions of pounds' worth of benefits into the long term, raising living standards, stimulating economic growth and accelerating the UK's transition to net zero. Improving the fabric of Britain's homes must go alongside electrification to meet the twin goals of reducing fuel poverty and tackling climate change.

Insulation measures are most effective at reducing bills and improving the performance of a house. External wall insulation brings much wider benefits as well, including in adaptation to the effects of climate change.

Successive government policies have recognised the importance of insulation, but installations have declined rapidly in recent years. Government-backed schemes must be long term and developed in partnership with industry.

Industry is committed to driving up standards to increase consumer confidence and have the greatest impact on energy use and wellbeing. Simplifying compliance can make installation cheaper, improving the payback period without compromising on quality. This government has an opportunity when setting future policy to have a greater impact on the lives of more people and on the future of our planet.



# Britain's housing stock is old, carbon intensive and poorly insulated

## OLD HOMES:

The UK has some of the oldest housing stock in the Europe, which is too often poorly insulated and expensive to heat. These older homes overwhelmingly use gas, have higher than average carbon emissions and are more likely to be classed as non-decent than newer homes.

## MILLIONS OF HOMES LEFT TO INSULATE:

Around 40% of dwellings have loft insulation (up from 37% in 2013) and just over half (53%) of dwellings have cavity or solid wall insulation (up from 46% in 2013).<sup>2</sup>

## ESPECIALLY IN PRE-1945 HOMES:

According to the latest English Housing Survey, just 5% of England's 8.9mn pre-1945 dwellings with solid walls have insulation, 17% have cavity wall insulation and 14% have cavity walls without insulation.<sup>3</sup> Further meaningful progress cannot be made on reducing domestic energy consumption without tackling the remaining homes in poor condition.

## LOW TAKE-UP OF LOW CARBON HEATING SO FAR:

The Energy Security and Net Zero Select Committee found that just 5% of UK homes use low carbon heating systems.<sup>4</sup> In 2023, 276,000 dwellings (1%) in England used a heat pump as their primary space heating system and around 1.5mn dwellings (6%) had solar panels.<sup>5</sup>

## HIGH LEVELS OF DAMP AND MOULD:

Homes with poor quality external elements and/or uninsulated walls are more likely to suffer from damp.<sup>6</sup> Around a third of people in the UK report suffering from mould in their homes, which exacerbates symptoms of respiratory infections, allergies and asthma, and is particularly dangerous for children and the elderly.

<sup>2</sup> <https://www.gov.uk/government/collections/english-housing-survey-2023-to-2024-headline-findings-on-housing-quality-and-energy-efficiency>

<sup>3</sup> <https://www.gov.uk/government/statistics/english-housing-survey-2023-to-2024-climate-resilient-homes-fact-sheet/english-housing-survey-2023-to-2024-climate-resilient-homes-fact-sheet>

<sup>4</sup> <https://committees.parliament.uk/publications/48054/documents/251274/default/>

<sup>5</sup> <https://www.gov.uk/government/statistics/english-housing-survey-2023-to-2024-low-carbon-technologies-in-english-homes-fact-sheet/english-housing-survey-2023-to-2024-low-carbon-technologies-in-english-homes-fact-sheet>

<sup>6</sup> <https://www.gov.uk/government/statistics/english-housing-survey-2023-to-2024-drivers-and-impacts-of-housing-quality/english-housing-survey-2023-to-2024-drivers-and-impacts-of-housing-quality>

This old and poor quality housing stock is making too many people poor and ill, and contributing to excess winter deaths

### **FUEL POVERTY REMAINS HIGH:**

The Committee on Fuel Poverty estimates that in 2024, 11.0% of households (2.73mn) were in fuel poverty in England, a figure which has barely changed since 2019.<sup>7</sup>

### **FUEL BILLS HIGHER FOR THE POOREST AND MOST VULNERABLE:**

Households living in damp homes have higher energy costs than those in non-damp homes. Disabled homeowners are most likely to have had to cut back in some way to afford their energy bills.<sup>8</sup>

### **COLD HOMES COST THE NHS £532MN PER YEAR<sup>9</sup>, AND KILL PEOPLE EVERY WINTER:**

According to the Institute of Health Equity, “old homes can cause and worsen respiratory conditions, cardiovascular diseases, poor mental health, dementia, hypothermia and problems with childhood development. In some circumstances, health problems may be exacerbated to a degree that they may cause death.”<sup>10</sup> Nearly 70% of excess winter deaths are attributable to respiratory and cardiovascular diseases, strongly linked to cold homes.<sup>11</sup>

### **POOR LIFE CHANCES:**

Children in cold homes are more than twice as likely to suffer a respiratory problem as those living in a warm home; Citizens Advice estimates that upgrading 13 million homes to EPC C would prevent 670,000 cases of childhood asthma.<sup>12</sup> As well as increasing the likelihood of poor physical and mental health, cold housing reduces a child’s chances of achieving and thriving at school, due to days missed through illness and the difficulty of studying in a cold home.



<sup>7</sup> <https://assets.publishing.service.gov.uk/media/67e51e2cbb6002588a90d5d5/annual-fuel-poverty-statistics-report-2025.pdf>

<sup>8</sup> <https://www.gov.uk/government/statistics/english-housing-survey-2023-to-2024-drivers-and-impacts-of-housing-quality/english-housing-survey-2023-to-2024-drivers-and-impacts-of-housing-quality>

<sup>9</sup> <https://bregroup.com/news/poor-housing-will-cost-over-135.5bn-over-the-next-30-years-without-urgent-action>

<sup>10</sup> <https://www.instituteoftheequity.org/resources-reports/fuel-poverty-cold-homes-and-health-inequalities-in-the-uk/read-the-report.pdf>

<sup>11</sup> <https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/deaths/bulletins/excesswintermortalityinenglandandwales/2019to2020provisionaland2018to2019final#excess-winter-mortality-by-cause-of-death> (the last year for which data is available where Covid is not the largest cause of excess winter deaths)

<sup>12</sup> <https://www.instituteoftheequity.org/resources-reports/the-health-impacts-of-cold-homes-and-fuel-poverty/the-health-impacts-of-cold-homes-and-fuel-poverty.pdf>

Fixing this problem will have billions of pounds' worth of benefits into the long term, raising living standards, stimulating economic growth and accelerating the UK's transition to net zero

### **£40BN ECONOMIC BENEFITS:**

Research by Citizens Advice found that upgrading all homes to EPC Band C would deliver around £40bn in benefits to the UK economy in the period to 2030, including almost £24bn of consumer bill savings, more than £9bn in societal savings and around £4bn in energy system savings.<sup>13</sup> The Construction Leadership Council found that for every £1 invested in a National Retrofit Strategy, at least £2 would be returned to the economy.<sup>14</sup>

### **LOWER CARBON EMISSIONS:**

If the UK's most energy inefficient homes were upgraded to an EPC band C, 97 million tonnes of CO2 emissions could be removed.<sup>15</sup>

### **LIFTING PEOPLE OUT OF FUEL POVERTY:**

The Energy Savings Trust estimated that improving all fuel poor homes to EPC C by 2030 would save households an average of £480 per year from their energy bills, enabling parents in these homes to give their children a better start in life.<sup>16</sup>

### **LOWER NHS COSTS:**

According to BRE's Cost of Poor Housing research, spending £250mn to improve the 65,000 homes with the most serious damp and mould hazards would unlock £4.8bn in societal benefit over the next 30 years.

### **IMPROVED MENTAL HEALTH:**

An evaluation of the Warm Front scheme showed that people with bedroom temperatures of 21°C are 50% less likely to suffer depression and anxiety than those with temperatures of 15°C.<sup>17</sup>

### **JOB CREATION:**

A national retrofit programme requires up to 500,000 builders, electricians, plumbers, engineers and carpenters – jobs which cannot be outsourced to AI, which will predominantly be filled by SMEs, and which are needed in every nation and region of the country for decades to come.

### **GREATER ENERGY SECURITY:**

Britain's homes account for a quarter of our national energy use;<sup>18</sup> reducing this demand will reduce our dependence on imported fuels and improve our resilience to price shocks. Greater energy efficiency could also reduce energy network costs by £4bn, savings which could be passed to consumers.

<sup>13</sup> <https://www.citizensadvice.org.uk/policy/publications/home-advantage-unlocking-the-benefits-of-energy-efficiency/>

<sup>14</sup> <https://www.constructionleadershipcouncil.co.uk/wp-content/uploads/2021/05/Construction-Leadership-Council-National-Retrofit-Strategy-Version-2.pdf>

<sup>15</sup> [https://files.bregroup.com/corporate/BRE\\_the\\_Cost\\_of\\_ignoring\\_Poor\\_Housing\\_Report\\_Web.pdf](https://files.bregroup.com/corporate/BRE_the_Cost_of_ignoring_Poor_Housing_Report_Web.pdf)  
<https://bregroup.com/news/poor-housing-will-cost-over-135.5bn-over-the-next-30-years-without-urgent-action>

<sup>16</sup> <https://energysavingtrust.org.uk/warm-homes-plan/>

<sup>17</sup> [https://shura.shu.ac.uk/18167/1/CRESR\\_WF\\_final%2BNav%2520%282%29.pdf](https://shura.shu.ac.uk/18167/1/CRESR_WF_final%2BNav%2520%282%29.pdf)

<sup>18</sup> <https://www.gov.uk/government/statistics/energy-chapter-1-digest-of-united-kingdom-energy-statistics-dukes>

# Improving the fabric of Britain's homes must go alongside electrification to meet the twin goals of reducing fuel poverty and tackling climate change

## FABRIC FIRST DELIVERS WARMER HOMES:

The Committee on Fuel Poverty says that “the best path toward sustainability for low-income households has to be a fabric first – insulation, insulation, insulation - approach. ECO, and other programmes, should not report new measures such as adding new heating controls in a home as though they are of equal worth to wall or underfloor insulation... between 2022-24, the shift away from fabric first delivery... may be cheaper ways of treating more properties to encourage reduced energy consumption, but are ineffective at delivering substantially warmer homes.”<sup>19</sup>

*“Improving energy efficiency by adopting a fabric-first approach is key in ensuring the transition to low-carbon heating is cost-effective and resilient.”*

Heat and Buildings Strategy, BEIS<sup>23</sup>

## STRATEGIC INVESTMENT:

The Cambridge Institute for Sustainability Leadership calls retrofit “a strategic investment in long-term financial stability, people’s well-being, and economic resilience.”<sup>20</sup>

## HEAT PUMPS WORK BEST IN WELL-INSULATED HOMES:

Heat pumps are most effective, and most likely to reduce energy bills, when installed in well-insulated homes. Poorly insulated homes need a larger capacity heat pump, which is more expensive to run. Research by Scottish Power and WWF shows that “when a heat pump is installed in a well-insulated, energy efficient home, energy costs are 37.4% lower than heating an energy inefficient home with an old gas boiler, and 25.8% lower than heating an energy inefficient home with a modern gas boiler.”<sup>21</sup>

## REDUCING PRESSURE ON ENERGY NETWORKS:

Widespread adoption of heat pumps without energy efficiency measures would increase demand for electricity; the National Energy System Operator says that “in the long term, [thermal efficiency measures] reduce the need for network investment and generation capacity.”<sup>22</sup>

<sup>19</sup> <https://www.gov.uk/government/news/fuel-poverty-has-not-fallen-to-any-meaningful-extent-in-5-years>  
<https://assets.publishing.service.gov.uk/media/66cdf604e046525fa39cf78/committee-on-fuel-poverty-annual-report-2024.pdf>

<sup>20</sup> <https://www.cisl.cam.ac.uk/news-and-resources/publications/business-case-integrated-retrofit-how-banks-insurers-and-government>

<sup>21</sup> <https://www.scottishpower.com/userfiles/file/Better%20Homes%2C%20Cooler%20Planet%20-%20Web%20Report%20-%203%20August%202022.pdf>

<sup>22</sup> <https://www.neso.energy/document/364541/download>

<sup>23</sup> [https://assets.publishing.service.gov.uk/media/61d450eb8fa8f54c14eb14e4/6.7408\\_BEIS\\_Clean\\_Heat\\_Heat\\_Buildings\\_Strategy\\_Stage\\_2\\_v5\\_WEB.pdf](https://assets.publishing.service.gov.uk/media/61d450eb8fa8f54c14eb14e4/6.7408_BEIS_Clean_Heat_Heat_Buildings_Strategy_Stage_2_v5_WEB.pdf)

# Insulation measures are most effective at reducing bills and improving the performance of a dwelling

## REDUCING HEAT LOSS IS ESSENTIAL:

Up to 35% of heat is lost through the walls of a dwelling, 25% through the roof and 15% through the floors. The most impactful retrofit measures reduce this heat loss (and the amount of heat needed to keep people warm) by insulating a house better. Fitting EWI over the entire exterior of a house can also reduce heat lost through thermal bridging better than other methods of insulation.

## GOVERNMENT STUDY SHOWS SWI MOST EFFECTIVE:

In June 2025, DESNZ's Demonstration of Energy Efficiency Potential (DEEP) study showed that "SWI was predicted to reduce [heat transfer] by between 10 and 60%, and household fuel bills by between 7 and 38%, substantially more than other retrofits... SWI is therefore the most impactful measure and saves more energy than all other measures combined."<sup>24</sup>

Under earlier government retrofit schemes, solid wall insulation accounted for the largest proportion of carbon savings of all measures installed.<sup>25</sup>

## COMBINING SWI WITH OTHER MEASURES IS EVEN MORE EFFECTIVE:

DEEP concludes that "Only SWI (and multiple measures including SWI) are predicted to achieve higher than 10% fuel bill savings per year, and as much as 38%... where homes have a large area of external wall and the SWI achieves a low U-value."

## EWI HAS THE BIGGEST IMPACT ON BILLS AND CARBON:

EWI has the greatest cost saving impact on fuel bills of all energy efficiency measures. On a semi-detached house (the most common dwelling type in England), it will save £330 from an annual fuel bill and 900kg of CO<sub>2</sub>.<sup>26</sup>

## INSULATION IS ESSENTIAL TO MEET CARBON REDUCTION TARGETS:

For its Seventh Carbon Budget in 2025, the CCC modelled the impact of installing all suitable energy efficiency measures in fuel poor homes. This would be equivalent to 1.5mn solid wall insulation installations, 600,000 cavity wall insulation installations and 3.4mn floor insulation installations. This would be equivalent to emissions being 20% lower than the Balanced Pathway (the CCC's recommended route for the UK to reach net zero by 2050) ten years early in 2040.<sup>27</sup>

## SWI REDUCES DAMP AND MOULD, AND OVERHEATING:

Beneficiaries of past ECO schemes who received SWI were more likely to report lower levels of damp and mould and less overheating in summer than beneficiaries of other measures.<sup>28</sup>

<sup>24</sup> [https://assets.publishing.service.gov.uk/media/671f61e4ae0462c448fc4074/1\\_DEEP\\_Synthesis\\_Report.pdf](https://assets.publishing.service.gov.uk/media/671f61e4ae0462c448fc4074/1_DEEP_Synthesis_Report.pdf)

<sup>25</sup> [https://assets.publishing.service.gov.uk/media/64230bbd3d885d000cdadd20/HEE\\_Stats\\_Detailed\\_Release\\_-\\_Mar\\_23.pdf](https://assets.publishing.service.gov.uk/media/64230bbd3d885d000cdadd20/HEE_Stats_Detailed_Release_-_Mar_23.pdf)

<sup>26</sup> <https://energysavingtrust.org.uk/advice/solid-wall-insulation/>

<sup>27</sup> <https://www.theccc.org.uk/wp-content/uploads/2025/05/Methodology-report-CCC-carbon-budgets-advice-2025.pdf>

<sup>28</sup> <https://assets.publishing.service.gov.uk/media/653f8705d10f3500139a6b2f/eco-evaluation-phases-2t-3.pdf>

# External wall insulation brings much wider benefits as well, including in adaptation to the effects of climate change

## **REDUCE OVERHEATING:**

Some forms of EWI reflect the sun's heat, helping keep indoor temperatures lower during the summer. As climate change makes heatwaves more common, keeping residents cool in their homes will become more important.

## **MORE RESILIENT TO WEATHERING:**

Adding an additional layer of insulation helps protect the fabric underneath from wear and tear from the elements, reducing repair bills and the frequency of maintenance.

## **IMPROVES STREET APPEAL:**

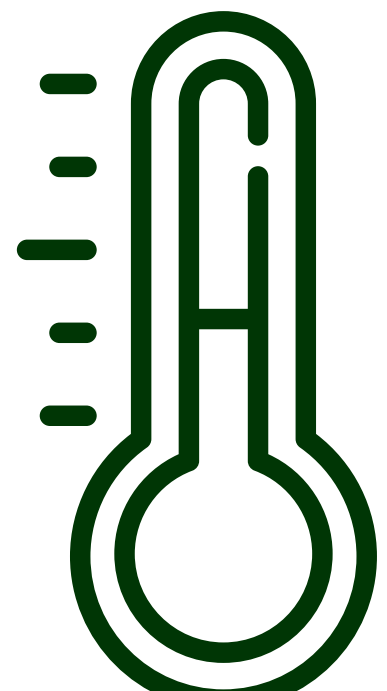
By improving the appearance of a property, particularly if it has been rundown or unkempt, EWI contributes to a greater sense of pride in a community, and improves the 'kerb appeal'. Some projects report falls in local reports of antisocial behaviour as a result.

## **REDUCES EXTERNAL NOISE:**

EWI can reduce the impact of noise pollution inside a property, by absorbing external sound. As well as disturbing sleep, noise pollution is linked to higher risks of cardiovascular disease.<sup>29</sup>

## **INCREASED VALUE:**

Better insulation is one of the most common measures which renters would like their landlords to install, alongside energy efficient appliances.<sup>30</sup> Greater energy efficiency, lower bills and improved appearance means that rental properties become a better investment for landlords. Owner-occupiers also see an increase in the value of their property.



Successive government policies have recognised the importance of insulation, but installations have declined rapidly in recent years

#### £9BN MORE IN BILLS:

Insulation installations fell by 90% following government policy changes in 2012/3. The ECIU found that if improvements had continued at the same rate, “upgraded homes would be using 15-20% less gas, the total gas demand from the overall housing stock would have been almost 10% lower than today, and the average household gas bill would be £350–400 lower... this could have saved Treasury and taxpayers around £9 billion.”<sup>31</sup>

#### STILL TOO LOW TO MEET CARBON TARGETS:

The CCC found in 2023 that “the number of Government-backed retrofits for fuel-poor households and residents of social housing has been insufficient for some years.”<sup>32</sup> One analysis found that between 2020 and 2023 the Government’s landmark schemes had installed just 15.8% of the measures which were actually needed in that time.<sup>33</sup>

#### FALLING UNDER ECO:

The number of measures under ECO fell during the second half of the 2010s from more than 80,000 per month in early 2014 to less than 20,000 per month (on average) from mid-2016 to mid-2020.

#### LOW SWI UNDER GBIS:

59,000 measures were installed under the Great British Insulation Scheme up to the end of December 2024. 42% were cavity wall insulation, 28% loft insulation, 21% heating controls and just 6% solid wall insulation.<sup>34</sup>

#### NO FABRIC MEASURES WITH BUS:

Despite industry warnings about the potential impact of abandoning a fabric first approach, the latest iteration of the Boiler Upgrade Scheme does not require homes to be insulated before the installation of a heat pump or biomass boiler.

*“Overall energy demand will drift further off track without faster deployment of energy efficiency measures in homes.”*

Climate Change Committee<sup>35</sup>

<sup>31</sup> <https://eciu.net/media/press-releases/2022/taxpayers-facing-18-billion-bill-for-failure-to-insulate-uk-homes>

<sup>32</sup> <https://www.theccc.org.uk/wp-content/uploads/2023/06/Progress-in-reducing-UK-emissions-2023-Report-to-Parliament-1.pdf>

<sup>33</sup> <https://neweconomics.org/2024/02/over-a-decade-of-cold-and-draughty-homes#:~:text=The%20UK%20has%20some%20of,living%20in%20a%20cold%20home>

<sup>34</sup> <https://www.gov.uk/government/statistics/great-british-insulation-scheme-release-february-2025>

<sup>35</sup> <https://www.theccc.org.uk/wp-content/uploads/2023/06/Progress-in-reducing-UK-emissions-2023-Report-to-Parliament-1.pdf>

# Government-backed schemes must be long term and developed in partnership with industry

## **LONGER TERM STRATEGIES WORK:**

The Welsh Government's Warm Homes Programme and its successor Optimised Retrofit Programme are part of a long term strategy to tackle fuel poverty from 2021 to 2035. The Scottish Government's Warmer Homes Scotland programme is a seven year funding commitment. This allows businesses to recruit and train the necessary staff, and to increase consumer awareness of the scheme.

## **SHORT RUNNING SCHEMES ARE LESS EFFECTIVE:**

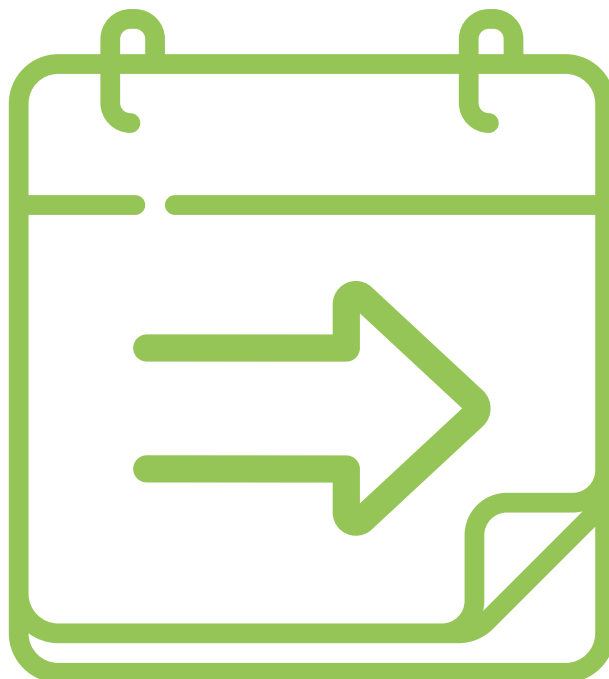
The longest period for installing measures in any phase of ECO is 48 months (July 2022-March 2026); too many schemes have run for just a couple of years, which does not allow industry the certainty it needs to train the right people and manufacture the right products. The CCC says that "a combination of stop-start funding, labour and material costs and regulation costs present barriers to the growth of supply chains for buildings-level energy efficiency measures."<sup>36</sup>

## **SEASONAL CONSIDERATIONS:**

External wall insulation is best installed at drier times of year, and funding cycles should reflect this, and be long enough not to force installation during the winter.

## **WELLBEING AS WELL AS CARBON:**

The Welsh schemes explicitly recognise the importance of health and wellbeing, as well as carbon reduction, thanks to The Well-being of Future Generations Act which requires all government policies to consider their impact on wellbeing.



Industry is committed to driving up standards to increase consumer confidence and have the greatest impact on energy use and wellbeing

#### **ACTIONS OF A FEW HARM THE MAJORITY:**

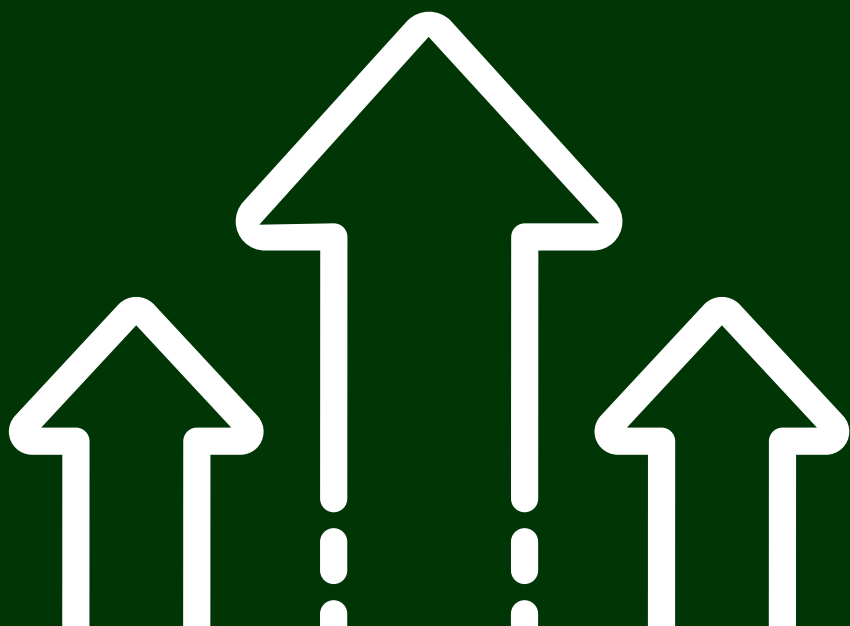
Poor quality installations can have a detrimental effect on the healthiness of a home and the integrity of a building, and reputable businesses are harmed by the actions of a minority. INCA sets strict quality guidelines for its members and these organisations are not among those which have been sanctioned by government for substandard installations.

#### **EWI COMPETENCE FRAMEWORKS:**

The Construction Industry Training Board has overseen the development of training standards. When longer term certainty is provided by government, these will be the basis for apprenticeships to train the workers we need.<sup>37</sup>

#### **INDUSTRY WELCOMES MOVES TO IMPROVE STANDARDS:**

Government has set out an ambition to simplify the system for standards and protections in a way which has the potential to protect consumers and support growth in the retrofit supply chain.



<sup>37</sup> [https://www.citb.co.uk/media/1loftj01/2914\\_citb\\_ewi\\_competence-frameworks-pdf\\_240625\\_v2.pdf](https://www.citb.co.uk/media/1loftj01/2914_citb_ewi_competence-frameworks-pdf_240625_v2.pdf)

Simplifying compliance can make installation cheaper and improve the payback period without compromising on quality or risk

#### **ADDS UP TO £950 TO A PROJECT:**

The Government's own analysis found that the GBIS requirement for installations to comply with TrustMark and PAS 2035 specifications would increase costs by around £950 per household.<sup>38</sup>

#### **Administration costs currently high:**

Up to March 2023, £579.9mn had been spent on administration costs under successive ECO schemes. Under ECO4, only 35 pence in every pound is spent on the fabric of a home, reducing the benefits felt by occupiers.

#### **PAS 2035 MAKES DELIVERY TIMES LONGER:**

Under PAS 2030/19, the average time taken to install SWI on a 90m<sup>2</sup> property was 7 days; under PAS 2035, it takes 40-70 days given the different stages of sign off now needed. Residents also dislike the increased number of visits needed from different professionals.<sup>39</sup> There are fewer contractors able to deliver to PAS 2035 standard, given the upskilling and paperwork capacity needed, resulting in longer wait times for installations to take place.

#### **AND MORE EXPENSIVE:**

On a 90m<sup>2</sup> home in England, SWI installation costs on average £95/m<sup>2</sup> under PAS 2030/19; under PAS 2035, that cost has increased to £160-175/m<sup>2</sup>. This reduces the number of measures which can be installed over the lifetime of a scheme.



This government has an opportunity when setting future policy to have a greater impact on the lives of more people and on the future of our planet

**PRIORITISE FABRIC:**

Government-backed schemes should continue to prioritise improvements to fabric in order to have the biggest impact across health, wellbeing, fuel bills and carbon reduction.

**INCREASE EFFICIENCY:**

Government should bring down administration costs in order to ensure that spending is focussed on installations and materials which will directly benefit consumers.

**LONG TERM PLANS:**

Future retrofit policies should run for at least the length of a Parliament, and ideally well beyond, to allow suppliers to adapt to the demands of a new scheme and consumers to be informed about it.

**PLACE-BASED:**

Devolving funding and responsibility for identifying homes to benefit from these schemes to local authorities will ensure that the right homes are targeted. They will also be able to work with local businesses to support the supply chain and skills training.

**RECOGNISE TRADE BODY MEMBERSHIP:**

Membership of bodies like INCA could be a useful gateway to ensure that reputable companies are eligible to supply government-led schemes; INCA's membership criteria, which include a rigorous review of a company's accounts, are more stringent than TrustMark's requirements for registered businesses.

**RECOGNISE RETROFIT IN EPCS:**

Future versions of EPCs should reflect the energy efficiency and contribution to wellbeing of a property – not just the cost of heating it.



LEADING THE UK EWI INDUSTRY

Tel: 0330 124 6585

Email: [info@inca-ltd.org.uk](mailto:info@inca-ltd.org.uk)

Website: [www.inca-ltd.org.uk](http://www.inca-ltd.org.uk)



VISIT WEBSITE