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**West Midlands
Combined Authority**

DEVOLVED BUILDINGS' RETROFIT PILOT

Scheme Guidance Aug 2025 v2

6.1.1 Grant Funding Stages and Grant Application Windows and **3.2** Key Dates for the Scheme revised **31-03-2026**

WEST MIDLANDS COMBINED AUTHORITY

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1. Forward

This Guidance supports Grant Applicants submitting Grant Applications for Grant funding under the UK Government’s Trailblazer Devolution Deal’s Devolved Buildings’ Retrofit Pilot (**Buildings’ Retrofit Pilot** or **Pilot**). The Guidance outlines the overall approach to retrofitting domestic and public buildings (**Buildings’ Retrofit**) under the Pilot, Project design, eligibility criteria, Grant Application and Grant allocation processes, and available support for regional stakeholders.

The West Midlands Combined Authority (**WMCA**) has developed its own scheme in relation to the Buildings’ Retrofit Pilot (**Scheme**), which will run from 1 April 2025 to 31 March 2028, and which comprises two separate tranches of Grant funding (**Stage 1 Development Funding** and **Stage 2 Delivery Funding**) covering funding for domestic and public buildings

2. Introduction and Policy Overview

2.1. Background

WMCA aims to reach net zero by 2041, with a 33% CO₂ reduction by 2026. WMCA’s Regional Energy Strategy (**RES**) sets out how the region can create prosperity and enable a fairer net zero transition for our communities. It supports a place-based approach to the energy system, promoting regionally co-ordinated Buildings’ Retrofit and decarbonisation activity. It advocates devolving Buildings’ Retrofit policies to better coordinate energy efficiency, low-carbon generation, and infrastructure planning.

For many years, local Government organisations have made the case to Government that a more flexible approach to funding centred on local needs would enable better delivery of Buildings’ Retrofit Projects, improving the quality of outcomes and the efficiency of Grant spend.

In 2023, WMCA secured the Trailblazer Devolution Deal, granting new powers and funding to the region. The Deal includes a Net Zero pillar, which supports strategic energy planning, industrial decarbonisation, and Buildings’ Retrofit of homes and Buildings’ Retrofit. It also commits to exploring further devolution of powers, including the ability to set devolving Minimum Energy Efficiency Standards (**MEES**), and commits to allocating funding for a three-year Buildings’ Retrofit Pilot under the Scheme.

The Pilot will be funded through WMCA’s Integrated Settlement: a single-department-style funding arrangement that spans an entire Spending Review period from 2025 onwards. This model aims to provide greater certainty and flexibility for regional investment, ensuring funds are allocated effectively to locally relevant interventions.

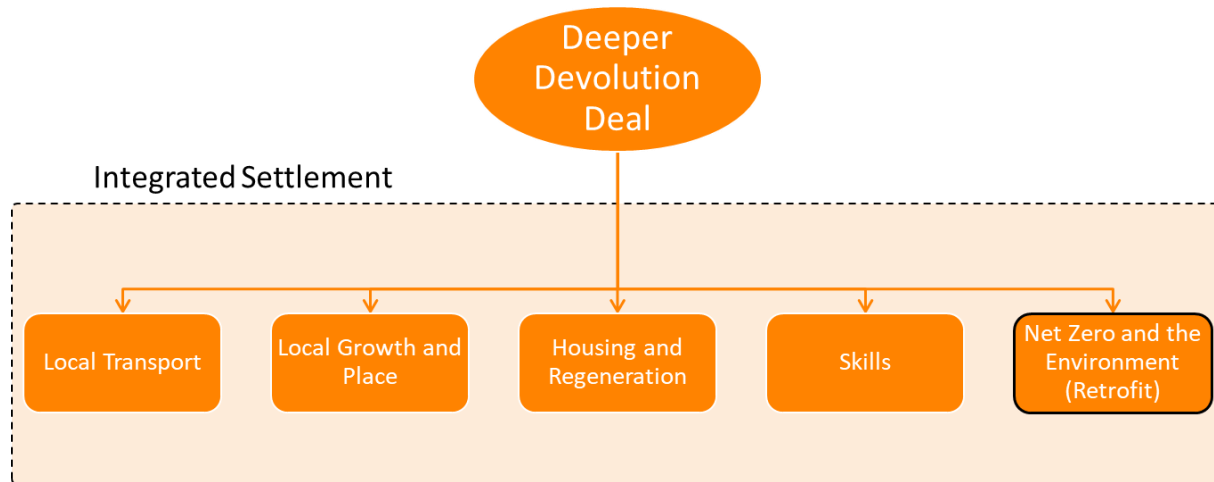


Figure 1: Representation of the five pillars of the Trailblazer Devolution Deal.

The metropolitan West Midlands has the highest fuel poverty rate of any county in England at 21.8% of all homes, with the rate in some areas of the region exceeding 60%. Nearly two thirds of the region’s communities rank in the bottom (i.e. worst) fifth for fuel poverty. It is estimated that at least 254,000 homes are fuel poor. This exacerbates issues in health, housing, and social mobility, and hinders economic progress.

WMCA estimates that meeting the net zero target for the region may cost in the range of £42-67bn, with Buildings’ Retrofit accounting for £28-52bn of this. While the costs are substantial, this will also bring about significant economic, social, and environmental dividends for the region. However, Government funding alone will never cover the full cost of retrofitting the region’s buildings. Barriers to market growth persist—including low consumer trust, poor-quality installation, and a lack of advice and attractive offers for households—and the rate of Buildings’ Retrofit is currently far too low to meet our net zero targets and make a significant difference in reducing fuel poverty.

The Pilot presents an opportunity to address the region’s needs in a different way, putting in place some of the building blocks to attract investment and increase Buildings’ Retrofit activity in the longer term. It provides flexibility to tailor funding to regional needs, fostering a long-term approach that will also enhance Local Authority capacity, encourage innovation, and stimulate market demand for Buildings’ Retrofit services.

2.2. Functional Strategies

WMCA has various Functional Strategies under its Integrated Settlement. These include its Functional Strategy for Buildings' Retrofit. The Buildings' Retrofit Functional Strategy¹ explains how and why the WMCA will invest the Buildings' Retrofit part of its Integrated Settlement to realise outcomes (**Outcomes**) through the Scheme. There are Functional Strategies for all WMCA's major programmes, projects and services and within each pillar of the Trailblazing Devolution Deal these are interlinked to provide regional and strategic alignment. They were all developed by WMCA with input from Local Authorities.

The Pilot will increase flexibilities for Grant-funded Projects and encourage wider market growth through building supply chain capacity, leveraging additional investment and supporting innovation. It will take a place-based approach where possible, to align with other local initiatives and increase the wider benefits of Buildings' Retrofit, including fuel poverty reduction, improved health and wellbeing, and creation of economic opportunities. The strategy also highlights links to other regional priorities, such as skills, transport, and housing regeneration, ensuring maximum impact and efficient resource allocation.

2.3. Place-Based Strategies

Place-Based Strategies have been under development by Local Authorities over the course of 2025 and have been particularly helpful in setting out Local Authorities' overall objectives for different geographies, the priority schemes and subject-relevant context.

A key aim of WMCA's Scheme for Buildings' Retrofit is to enable Local Authorities and regional organisations to determine the priority areas and approaches for delivering funding for Buildings' Retrofit, giving them the greatest opportunity to integrate their allocation with their Place-Based Strategies.

The Scheme will allocate Grant funding to Local Authorities and the region on a fair-share basis. This will be to retrofit domestic and public buildings, abating carbon emissions and alleviating fuel poverty. Ideally, regional partners will propose projects that align with the Scheme's Functional Strategy and are focused on areas within Place-Based Strategies, being led by Local Authorities.

The Place-Based Strategies acknowledge wider climate change and Net Zero objectives and identify priority areas, like areas of social housing or significant deprivation, for deploying domestic Buildings' Retrofit at scale. They acknowledge the wider aims of Buildings' Retrofit across tenures (private rented, owner occupied, or public sector buildings); trying to stimulate the 'willing to pay' market; the development of a competent

¹ WMCA (2025) <https://www.wmca.org.uk/documents/integrated-settlement/net-zero-buildings-retrofit-functional-strategy/>

and skilled local workforce; and the wider aims of Buildings' Retrofit and smart energy systems integration.

For example, Birmingham City Council's Place-Based Strategy discusses the interrelationship between their programmes to engage the energy sector to decarbonise the energy supply, creating Heat Zoning Networks and using place-based programmes (like Knowledge Quarter) to deliver change. Others, like Dudley Council, point to the development of their Net Zero Neighbourhood, in Brockmoor, to co-create Projects with communities that transition their areas to Net Zero, incorporating wider benefits for transport, green space improvements or public realm improvements.

Looking further ahead, work on Local Area Energy Planning (**LAEP**) and the WMCA's LAEP+ tool should feature within Place-Based Strategies and help Local Authorities to map out the opportunities, constraints and improvement options for wide-scale energy system change. Use of this data and tool will be essential to understanding the energy and infrastructure characteristics of different places within the region, identifying plausible pathways to net zero and how area-based Buildings' Retrofit Projects can contribute to this.

2.4. Regional Energy Strategy

The RES² sets out how West Midlands leaders and communities can take advantage of wider changes that have an impact on the energy system of the region. By working in partnership with industry, Ofgem, NESO, Great British Energy, the National Wealth Fund, and central Government, the region can become the national trailblazer for smart energy systems.

This will support the Government's Clean Energy Superpower Mission, as well as local and national objectives to grow and transition our economy, reduce fuel poverty and support a health system that is fit for the future, and build a fairer society that has better access to training and jobs.

The West Midlands will continue to pioneer a smart approach to the energy transition that:

- Delivers net zero.
- Reducing energy costs.
- Creates investment opportunities.
- Ensures a just transition for our businesses and communities.

² WMCA (2025) <https://www.wmca.org.uk/what-we-do/environment-energy/energy-capital/policy/regional-energy-strategy/>

3. Outline of the Scheme

This Section 3 outlines the overall approach of the Scheme, duration, aims, funding lines, stakeholder responsibilities, outcomes, and spending rules.

3.1. Overall Approach

The Scheme brings together three national capital Grant funding schemes—Warm Homes: Social Housing Fund (**WHSHF**), Warm Homes: Local Grant (**WHLG**) and Public Sector Decarbonisation Scheme (**PSDS**). This represents £167m of capital funding across three years (2025/26 to 2027/28). Combining funding in this way will enable better co-ordination of investment at a local level and support a place-based approach to Buildings’ Retrofit.

Aims and Principles

WMCA’s Scheme to deliver on the Pilot for the West Midlands, and commencing in May 2025, will support the decarbonisation of domestic and public buildings, and reduce domestic fuel poverty through a new devolved model for Grant funding and delivery. To achieve its primary Outcomes, the Scheme must deliver the Outcomes Framework targets set by the Government³.

The Scheme also aims to achieve secondary Outcomes and other co-benefits, such as stimulating regional market development, capacity building and innovation in the sector (see Sections 3.5 and 6.2.1 for details on Outcomes). Collaboration at the local and regional level can contribute to a more joined up approach to skills development, supply chain engagement and sharing of best practice approaches that can raise quality across the board.

The Scheme must deliver on its intended Outcomes and demonstrates the wider impacts and benefits of the approach so a strong case can be made to the Government to recommission the Scheme.

Whole-Building Approach to Buildings’ Retrofit

In line with modern best practice, WMCA takes a “whole building” approach to Buildings’ Retrofit. This approach takes into account all aspects of a building’s fabric and services, and the interactions between them, but also considers the building’s context, the long-term impact of interventions (including maintenance, end of life impact and lifecycle carbon emissions) and the health and wellbeing of occupants. This is the driving force

³ MHCLG (2025) [WMCA – Integrated Settlement Outcomes Framework 2025 to 2026](#)

behind the Scheme and ensures its focus is on the right measures, for the right buildings, for the right outcomes.

Context includes exposure and the local weather conditions—a change which might be safe in a well-maintained and sheltered building might lead to serious moisture issues in a more exposed location. Context also includes the condition of the building: considering repair before Buildings’ Retrofit to avoid locking in problems.

Interactions can be complex. For example, any insulation and air tightness measures which reduce natural ventilation can have a negative impact on indoor air quality and therefore on human health, so Buildings’ Retrofit assessment must cover all building fabric and services, and ventilation must be carefully considered. To achieve the intended savings in full, adjustments are normally also needed to the heating distribution and/or controls.

A whole building approach can also make a positive contribution towards local regeneration, by providing employment and training, using local materials, enhancing heritage, and, where possible, repairing and re-greening the surrounding area or providing facilities to be used by the wider community.

The WMCA encourages the use of low-impact and sustainable materials in Buildings’ Retrofit and expect to see that Grant Applicants consider this in their Projects. Evidence supporting such an approach could include lifecycle analysis / assessments and whole life costing.

See Section 5.6 and Appendix 4 for more details on the Whole Building Approach.

Geographic Scope

The geographic scope of the Scheme spans the West Midlands Metropolitan County (i.e. the seven WMCA constituent member Local Authorities only), and the stock-holding Housing Associations and eligible Public Sector Bodies within it. Please see Sections 4.1 and 5.1 for Eligible Organisations.

Types of Eligible Organisations Funded

Grant funding will be allocative, distributing to the region on a fair-share basis and using the same formulae used to work out the WMCA’s Integrated Settlement for the Scheme (see Section 3.4 for allocation methodology). Direct allocations, covering the three policy schemes, will be made to organisations across the West Midlands Metropolitan County (see Appendix 2 for a full budget breakdown), including:

Table 1: a list of the types of Eligible Organisations for the Buildings' Retrofit Pilot

Organisation	Grant Funding
Seven WM Local Authorities	Representing 69.8% of funding and £110.1m. Including all funding Schemes.
Large Housing Associations (>1000 stock)	Representing 26.2% of the total Grant and £41.4m. (43.9% of funding allocated for social housing only)
Small Housing Associations (<1000 stock)	Representing 1.6% of the total Grant and £2.6m (2.8%% of funding allocated for social housing only). Funding allocated to a single pot into which Grant Applications can be made.
Public Sector Organisations	Representing 2.2% of the total Grant and £3.5m. Including funding for public buildings only (10%). Funding allocated to a single pot into which Grant Applications can be made.
See Section 3.4 for more detail on how these allocations will work.	

Allocation of Grant Funding

The Grant funding will be separated into two stages. Stage 1 Development Funding, and Stage 2 Delivery Funding (see Section 6.1 for more detail on the funding stages and drawdown process). Development funding will enable Grant Applicants to bring Projects to the point where there is a high degree of confidence over costs and Outcomes. Potential activities undertaken during this phase are likely to include building assessment and data collection, resourcing and recruitment, planning procurement, community engagement and wider activities. Delivery funding will support Grant Applicants to carry out the full scope of compliant works detailed in their Project plan.

For Local Authorities who have funding across multiple funding pots, we encourage them to consider the funding allocation, rather than three separate funding pots. This also means considering how this funding can be managed and balanced to achieve the best Outcomes, for example using part of their social housing allocation for private homes to enable a place-based approach, or vice versa, or using underspend on a housing Project to top up a public sector building Project.

Similarly, we would expect Local Authorities and wider organisations to consider how all funding available to them can be used most effectively to maximise Outcomes and deliver into a Project. This might mean leveraging private capital, using wider Grant funding available – for example the Energy Company Obligation, Boiler Upgrade Scheme, Great British Insulation Scheme, and school maintenance funding - or borrowing through lenders (for example Public Works Loans Board or the National Wealth Fund, which has recently set up a loan facility to decarbonise social housing).

Any funding that is not taken up will be reallocated across the programme. We would like to engage organisations early to understand which ones have the desire and capacity to deliver over and above their funding allocation. We will set out that process for reallocating any underspend at the programme level at a later date.

Project Development and Delivery

Grant Recipients will lead on the development and delivery of Projects, using their funding allocations and associated Co-Funding. They will be responsible for delivering against their minimum Outcomes, which will be calculated for each allocation. Ideally, Grant Recipients will use the flexibilities and extended timescales available through the Scheme to exceed these targets and demonstrate additional secondary benefits. WMCA will work with and support organisations to do this through the provision of regional-level initiatives, such as a Technical Assistance Facility (**TAF**), WMCA Managed Support Services (**Managed Support Services**), data management to support efficient reporting, customer journey support (**Customer Journey Support**) and more.

WMCA will be responsible for programme monitoring and oversight including reporting to government, data gathering, co-ordination of learning and leading market development activity at the regional level. Data gathering, evaluation and impact reporting will play a critical role in is crucial in developing learning and best practice.

3.2. Key Dates for the Scheme

Table 2 below sets out the key dates for the Scheme, including deadlines for submission of Grant Applications.

Table 2: Key dates for the Scheme.

Key Date	Activity
June 2025	Scheme Launch and publication of key Transaction Documents.
5 June 2025	Monthly Buildings’ Retrofit Pilot Programme Panels (Panels) will commence for Stage 1 Development Funding and Stage 2 Delivery Funding Grant Applications.
11 June 2025	Scheme launch and publication of first Scheme Guidance, Grant Application templates and Grant Framework Agreement (GFA) (including within it the Data Sharing Agreement (DSA)).
30 June 2025	Final deadline for Large Housing Associations (>1000 stock) to confirm via email response to WMCA their intention to make a Grant Application to draw down on their allocated funding within the

Key Date	Activity
	allotted Stage 1 Development Funding and Stage 2 Delivery Funding windows.
16 October 2025	Submission of Stage 1 Development Funding detail in a Development Plan and/or Public Buildings Application Form. Stage 1 detail requirements are highlighted within each Grant Application form. Where a Stage 1 Development Funding Grant Application has not been submitted by this date, any funding allocations will be subject to reallocation.
15 January 2026	Submission of a full Development Plan (Stage 1 Development Funding and Stage 2 Delivery Funding detail) for social housing only Projects. Submission of a Public Buildings Application form (Stage 1 Development Funding detail) by Non-Local Authority (LA) Public Sector Organisations applying directly to the WMCA Hub. These bids will be evaluated together and funding allocated to the strongest Projects.
16 July 2026	All Grant Applicants must submit a Grant Application (Stage 1 Development Funding and Stage 2 Delivery Funding detail) that equates to a minimum 30% of the allocated Grant. For any Grant Application of less than 30%, the shortfall could then become available for reallocation.
30 November 2026	For Local Authority PSDS which may incorporate a series of phased stage 2 Grant Applications, the final phased application must be submitted by no later than 30th November 2026 (any remaining Grant not claimed via a Grant Application will be available for reallocation).
14 January 2027	All remaining WHLG Grant Stage 2 Applications must be submitted. Any remaining Grant not claimed via a Grant Application will be available for reallocation.
31 March 2028	End of the Grant spend period.
30 September 2028	All Project works and TrustMark lodgement completed.

Table 3 below sets out the Panel meeting dates where Grant Applications will be considered and approved, and the submission deadlines for each of these Panel meeting dates. The Panel will also review progress of the Pilot as a whole and to consider reallocating any funding, and meetings will take place after the longstop dates set out in **Table 2**.

Table 3: Key Buildings' Retrofit Pilot Panel Grant Application submission and panel dates.

Year	Application Submission	Panel Date
2025	29-May	5-Jun
	12-Jun	26-Jun
	17-Jul	31-Jul
	14-Aug	29-Aug
	15-Sep	29-Sep
	16-Oct	30-Oct
	13-Nov	26-Nov
	Dec N/A	Dec N/A
2026	15-Jan	29-Jan
	12-Feb	26-Feb
	17-Mar	31-Mar
	16-Apr	30-Apr
	13-May	28-May
	23-Jun	30-Jun
	16-Jul	30-Jul
	Aug N/A	Aug N/A
	16-Sep	30-Sep
	15-Oct	29-Oct
	12-Nov	26-Nov
	Dec N/A	Dec N/A
2027	14-Jan	28-Jan
	-	25-Feb
	-	31-Mar
	-	29-Apr
	-	27-May
	-	30-Jun
	-	29-Jul
	Aug N/A	Aug N/A
	-	30-Sep
	-	28-Oct
	-	30-Nov
	Dec N/A	Dec N/A
	2028	-
-		29-Feb
-		30-Mar
-		27-Apr
-		31-May
-		29-Jun
-		27-Jul

Year	Application Submission	Panel Date
	Aug N/A	Aug N/A
	-	28-Sep
	-	31-Oct
	-	30-Nov
	Dec N/A	Dec N/A

3.3. Grant Funding Quantum

The Pilot is funding 2025/26 to 2027/28 and will receive a regional allocation from national Buildings' Retrofit Grant funding pots, based on the number of Eligible Buildings within the West Midlands as a percentage of the total for England (Table 4).

Table 4: The West Midlands' regional allocation of national Buildings' Retrofit Schemes for the Scheme

Grant Funding Available	WMCA share of national Grant	25/26 (£000)	26/27 (£000)	27/28 (£000)	Total (£000)
Warm Homes: Social Housing Fund (CDEL)	7.8%	29,172	35,802	35,802	100,776
Warm Homes: Local Grant (CDEL)	5.8%	5,280	12,360	12,360	30,000
Public Sector Decarbonisation Scheme (CDEL)	3.6%	3,348	16,488	16,488	36,324
Total		37,800	64,650	64,650	167,100

3.4. Grant Funding Allocation Approach

Grant funding will be allocated to Local Authorities and Housing Associations initially on a fair share basis according to the approach set out in the table below, which also includes details on Co-Funding expectations for each funding pot. For example, an organisation that is responsible for 10% of the eligible buildings within the scope of the relevant national funding Scheme would receive 10% of the funding from that national Scheme.

Details of funding allocations by organisation are set out in Appendix 2. In the event that an organisation does not wish or is unable to apply for their full funding allocation within the

associated Grant Application windows (see Section 6.1 for details), funding will be reallocated (see Section 6.3 for details).

For public buildings, 10% of the available Grant funding will be allocated to a pot for non-LA Public Sector Organisations⁴. For social housing, 2.8% of the available Grant funding will be allocated to a pot for small Housing Associations (<1000 stock in the WMCA area) to apply into.

Further detail of the Grant Application process is set out in Section 6.1.2.

Table 5: Approach for allocating Grant

National Funding Stream	Regional (WMCA) Quantum Based On	Quantum Based On	Co-Funding Minimum Percentage Contribution
Warm Homes: Social Housing Fund (WHSHF)	Number of social rented homes EPC D and below in as a percentage of the national total (based on English Housing Survey data) - 7.8%	Number of social rented homes EPC D and below in as a percentage of the regional total (based on NROSH stock data for RPs), minus WMCA top slice for admin of fund, technical assistance, regional initiatives	50% contribution
Warm Homes: Local Grant (WHLG)	Number of private sector fuel poor homes as a percentage of the national total (based on English Housing Survey data) - 6.0%	Number of private sector fuel poor homes as a percentage of the regional total (based on EHS data), minus WMCA top slice for admin of fund, technical assistance, regional initiatives	No Co-Funding is required from owners of occupied homes. 30% Co-Funding required from private landlords up to four dwellings.
Public Sector Decarbonisation Scheme (PSDS)	Total public sector floor area in WMCA area as a	Total public sector floor area in LA as a percentage of the regional total (based on	12%

⁴ Please note, non-LA Public Sector Organisations may also be able to access funding through the relevant LA, depending on how the LA plans to use its funding allocation

National Funding Stream	Regional (WMCA) Quantum Based On	Quantum Based On	Co-Funding Minimum Percentage Contribution
	percentage of the national total (based on 2023 DEC data) - 3.6% (does not include universities, acute hospitals)	2023 DEC data), minus WMCA top slice for admin of fund, technical assistance and 10% allocated to other Public Sector Organisations	

3.5. WMCA Outcomes Framework

As part of the Integrated Settlement, WMCA and the Government have agreed a framework of Outcomes (**Outcomes Framework**), which will be monitored throughout the Scheme and will be used to evaluate how successful the Scheme has been.

WMCA are dividing the Outcomes into primary Outcomes, which are formed around the statutory obligations of the Department for Energy Security and Net Zero (**DESNZ**) relating to carbon reduction and fuel poverty, and secondary Outcomes, which reflect the broad range of co-benefits and potential social value that may arise from retrofitting homes and public sector buildings.

WMCA has negotiated primary Outcomes (carbon savings and fuel poverty reduction) with DESNZ and the Ministry for Housing, Communities and Local Government (**MHCLG**). These represent the minimum expected delivered impacts from the Scheme, and each Project is expected to achieve a fair share of these Outcomes and ideally to exceed them.

Secondary Outcomes are desirable consequences or benefits that may result from Buildings’ Retrofit Projects and will enhance the overall impact of the Scheme. While Projects will be required to report on secondary Outcomes, no mandatory target will be set for each Project. Grant Applications will need to set out how each Project will contribute towards achievement of these Outcomes.

Table 6: Overview of the Outcomes Framework for the Scheme

Outcomes	Further Detail
Primary Outcomes	Reduced fuel poverty gaps for households in or at risk of fuel poverty (particularly within social housing).

Outcomes	Further Detail
	Reduced carbon emissions for homes and public sector buildings.
Secondary Outcomes	More comfortable and healthy homes because of Buildings' Retrofit that support physical and mental health and wellbeing.
	Improved value for money (compared to parent Schemes) and leverage of private investment, which could be channelled through a regional net zero fund. The Local Net Zero Accelerator programme is currently investigating the feasibility of this.
	Sustained growth in local Buildings' Retrofit supply chain capability and capacity, and local skills and employment growth linked to the scheme.
	Increased capacity and capability of partner organisations in delivering and supporting Buildings' Retrofit activities.
	Increased Mayoral Combined Authority capacity and capability to deliver or manage Buildings' Retrofit upgrades in their regions.
	Increased investment from 'willing to pay' sector in Buildings' Retrofit upgrades (Buildings' Retrofit market development and innovation).
	Lessons identified from piloting the devolution of Buildings' Retrofit funding that improves the evidence base for future policymaking by using real-performance data.
	Increased inclusion of households that are more challenging to engage and of buildings that are more complex to decarbonise through Buildings' Retrofit Schemes.
Further Outcomes that may result from activities under the Buildings' Retrofit Pilot	Increased resilience to future climate/economic shocks.
	Increased understanding of feasible pathways to net zero, including the socioeconomic costs and opportunities of these.
	Reducing homelessness through prevention (jobs security/availability, skills, bill savings) and mitigation (providing more decent and healthy homes).
	Creation of more decent and affordable homes.

The table below sets out the Primary Outcomes Targets for the Scheme, relating to reduced fuel poverty and carbon emissions, as well as the assumptions that sit behind these allocations and where flexibility is available within the programme. Programme level Outcomes will be subject to review in Q3 2025/6 once more detail on the Project pipeline is available and there is a better idea of what is realistic and achievable.

In considering the table below, it should be noted that while these Outcomes apply at the programme level, Projects could be shaped in several different ways to meet these targets. Further guidance on this on this is set out in Section 6.2.1.

Table 7: Government’s Outcomes Framework for the Devolved Buildings’ Retrofit Pilot with commentary

Outcome and Output	Target	Further detail
Number of social homes upgraded to EPC C	12,300	<ul style="list-style-type: none"> • The target is based on DESNZ modelling of the expected measure mix and costs per home at the national level • Up to 10% of social rented homes can be EPC C and above • Up to 10% of homes can be flexed towards private low income/fuel poor households • Up to 5% of homes can be treated with no tenure or starting EPC specified • The three flexibilities above are cumulative
Number of low-income private homes upgraded to EPC C	1,700	<ul style="list-style-type: none"> • The target is based on DESNZ modelling of the expected measure mix and costs per home at the national level • Up to 10% of homes can be flexed towards social rented homes • Up to 5% of homes can be treated with no tenure or starting EPC specified • The two flexibilities above are cumulative
Accumulative lifetime bill savings from homes (£m over 2025 – 2069, 3-year target)	145.2	<ul style="list-style-type: none"> • Based on a modelled average energy bill saving per home of £235.7/year • Savings can be deemed by using pre- and post-works EPCs, but other methods of determining savings (e.g. measured savings) can be considered
Lifetime carbon reductions from homes (ktCO ₂)	369	<ul style="list-style-type: none"> • Assumes 44-year lifetime • Based on a modelled average annual carbon saving of 0.6 tCO₂ per home

Outcome and Output	Target	Further detail
Annual carbon emissions reductions from public buildings (ktCO ₂)	3.6	<ul style="list-style-type: none"> Assumes an average Project lifetime of 22 years, based on DESNZ modelling of Projects at the national level

4. Homes

This Section 4 is intended as a guide to what domestic Buildings’ Retrofit Projects can be funded within the scope of the Scheme, but is non-exhaustive, and WMCA is open to Grant Applications that show how Scheme Outcomes could be met in innovative or alternative ways.

4.1. Eligible Organisations

The Eligible Organisations for the Scheme are:

- Birmingham City Council
- Coventry City Council
- Dudley Metropolitan Borough Council
- Sandwell Metropolitan Borough Council
- Solihull Metropolitan Borough Council
- Walsall Metropolitan Borough Council
- City of Wolverhampton Council
- Registered Providers of social housing and Registered Charities that own social housing in any of the seven Local Authorities named above

WMCA recognises that in a small number of circumstances, it may be more appropriate for a Housing Association or registered charity that owns homes both inside and outside the WMCA area to apply for funding through the Scheme, rather than applying to both the national Warm Homes: Social Housing Fund and the Scheme, for example where a small number of homes in the Project are just outside the Scheme area.

In this case, the Housing Association should look to secure funding from the scheme operating where the majority of the Project is based. Where a Housing Association’s Project includes stock that falls mostly within WMCA with a small amount of stock outside WMCA, it would be reasonable for the Housing Association to seek funding for the entire Project from WMCA.

For the above Eligible Organisations to apply, please submit a Development Plan, filled to the correct stage (Stage 1 Development Funding or Stage 2 Delivery Funding) and with all relevant supplementary documents, to WMCA’s inbox: Devolved.Retrofit@WMCA.org.uk.

For homeowners or private landlords, please express your interest in receiving a Grant through WMCA's website⁵. Please also consider applying directly through your LA, or through the national eligibility checker for this Scheme⁶.

4.2. Grant Funding Allocation

The basis for allocating funding to Local Authorities and Housing Associations with more than 1,000 homes in the region⁷ is set out in Section 3.4 and details of allocations to individual organisations can be found in Appendix 2.

For Housing Associations with fewer than 1,000 homes, funding has been set aside as a single pot based on the aggregated number of homes owned by smaller Housing Associations. This represents 2.8% of the available Grant funding within the Scheme. This funding will be managed by the WMCA Hub's Buildings' Retrofit Delivery team as a consortium of smaller landlords through its Managed Support Services, in recognition of the fact that smaller landlords may require more support in forming and delivering Projects, and that centralising some functions are likely to be an efficient way of providing support.

More information on the Customer Journey Support services can be found in Section 4.9 and on the WMCA Managed Support Services in Section 9.

4.3. Eligible Properties

Eligible social homes for the Scheme are defined as follows:

- All existing social housing, as defined by the Housing and Regeneration Act 2008 (sections 68-70), as defined in Section 4.1.

Eligible private homes must meet **one** of the following criteria:

- Households in a valid postcode that falls within eligible Income Deciles 1-2 of the Indices of Multiple Deprivation (IMD:ID 1-2)
- Private households in receipt of one of the following specified means-tested benefits (anyone in the household may be in receipt of these benefits to qualify):
 - Housing Benefit
 - Income-based Jobseeker's Allowance (JSA)
 - Income-related Employment and Support Allowance (ESA)

⁵ WMCA (2025) <https://www.wmca.org.uk/what-we-do/environment-energy/energy-capital/the-building-retrofit-pilot/>

⁶ GOV.UK (2025) <https://www.gov.uk/apply-warm-homes-local-grant>

⁷ Based on 2023 stock data available from the Regulator of Social Housing: <https://www.gov.uk/government/statistics/registered-provider-social-housing-stock-and-rents-in-england-2022-to-2023>

- Income Support
- Pension Credit (savings and guarantee)
- Universal Credit
- Private households that meet the current ECO4 Flex criteria for Route 2⁸
- Private households with a gross annual income below £36,000 or the equivalised 'After Housing Costs' threshold for their household composition (see Appendix 5). The income threshold is inclusive of tax and should be calculated as an annual figure where possible. The income of every adult member of the household counts towards the income threshold, other than those in full-time education. The income of lodgers should not count towards the income threshold, however if the household is in receipt of any rental payments from lodgers, this should be counted towards the household income.
- Self-declarations are not an acceptable method of verification for private homes. Local Authorities will be required to undertake robust checks to confirm that each household meets the eligibility criteria. LAs also reserve the right to not treat a property if they do not feel they have a low income or are not at risk of fuel poverty, given that a key aim of the Scheme is to support households that are in genuine need and likely to be in or at risk of fuel poverty.

Owner Occupiers

Owner Occupiers in eligible households are not required to contribute towards the cost of upgrades. However, in some cases an owner occupier may wish to contribute to the cost of works to enable an installation to take place. In these cases, Local Authorities should consider how to best to enable voluntary householder contributions.

Private Rented Sector (PRS)

Private landlords who have low-income tenants that meet the household eligibility criteria above, living in homes that meet the eligibility criteria in this Section 4, can access Grant funding. This policy will be kept under review and the WMCA reserves the right to make in-flight changes. Private landlords will be expected to make a 30% contribution towards the cost of works for up to four properties. For the fifth and any further properties, private landlords will be expected to make a 50% contribution towards costs. All contribution payments must be made prior to commencement of any works

⁸ Ofgem (accessed 2025) <https://www.ofgem.gov.uk/publications/great-british-insulation-Scheme-and-eco4-local-authority-administration-guidance>

Should any of the eligible properties be located across more than one Local Authority boundary, the element of Grant subsidy applicable to those properties will be allocated to that Local Authority

Privately rented properties must be rated at least EPC Band E to qualify, unless they are EPC Band F and G properties with a registered exemption under the Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015. This is because funding cannot be used to upgrade properties not compliant under these regulations.

However, Scheme funding may be used to address Category 1 hazards relating to poor energy performance where these have been identified under the Housing Health and Safety Rating System (HHSRS). The main HHSRS hazard relating to energy use is Excess Cold, but other hazards may relate to poor energy performance, including damp and mould growth, excess heat, carbon monoxide and fuel combustion products and Un combusted fuel gas (noting that Scheme funding cannot be used to repair a gas boiler or for a like for like replacement).

We encourage project teams to work closely with housing enforcement teams to coordinate engagement and enforcement activity within private rented homes. This may include housing enforcement teams referring properties with relevant Category 1 hazards for Scheme funding, coordination of Buildings' Retrofit assessments with HHSRS inspections, working with Buildings' Retrofit assessors to identify Category 1 hazards and notify these to housing enforcement teams, and working with landlords to use Scheme funding as an incentive to improve identified hazards.

Through the Scheme, WMCA Hub is supporting LAs to increase the scope of housing enforcement activity for MEES and HHSRS, and further details of this will be made available later.

There will be no eligibility restriction against landlords based on the number of properties that they own. Landlords are free to upgrade as many eligible properties as they wish, so long as they do not exceed the minimum financial assistance (**MFA**) limit (see below) and meet the required contribution to the costs of upgrades for up to four properties.

There are three declarations that will be required from landlords to take part in the Scheme:

- Express permission for landlord details to be shared and stored on a central database of landlords participating in the Scheme
- Agreement to support WMCA or DESNZ-led surveys or evaluations regarding PRS uptake in the Scheme
- Confirmation that the MFA threshold will not be exceeded

A central database will be maintained (with all data permissions given) to monitor the number of fully funded upgrades a landlord has received under the Scheme (see Section 11.4 for more details).

Upgrades to PRS properties will constitute a subsidy to landlords under the Subsidy Control Act (2022). LAs will be required to ensure that the subsidy to each PRS landlord does not exceed the MFA limit of £315,000. This includes the value of any support to be given to the Landlord through the Scheme, in addition to any previous subsidy received by the landlord over the current and previous 2 financial years. This ensures no single landlord receives excessive amounts of funding and reduces the administrative burden on LAs of conducting a full principles assessment under the Act.

To enact this requirement, during the sign-up process, Local Authorities will need to notify the relevant PRS landlord explaining that the Local Authority is proposing to give to the landlord a subsidy by way of MFA, specifying the gross value amount of the assistance, and requesting written confirmation from the landlord that the MFA threshold will not be exceeded by the landlord receiving the proposed assistance.

The landlord will then need to confirm the above in writing. Prior to providing the upgrades, Local Authorities will need to confirm in writing to the relevant PRS landlord that:

- The subsidy is given as MFA,
- The date on which it is given, and
- The gross value amount of the assistance.
- LAs are responsible for completing their own subsidy control assessment.

Where the total value of all subsidies to a single PRS landlord exceeds £100,000, the LA will need to comply with the transparency requirements of the Act. For further guidance, see the Statutory Guidance document at <https://www.gov.uk/government/publications/uk-subsidy-control-statutory-guidance>.

4.4. Eligible Measures

Eligible measures are any energy efficiency measure compatible with the latest version of the Standard Assessment Procedure (**SAP**) that will help improve the energy performance of homes, excluding heating systems that are solely fuelled by fossil fuels, but including any enabling or preparatory works that are needed to ensure successful installation. Measures that are not compatible with the latest version of SAP can also be considered; however, these would need to be approved on a case-by-case basis and any energy bill and carbon savings would need to be evidenced by in-use monitoring before and after installation.

Grant Applicants should take a whole building approach, as detailed in Section 3.1. in identifying the most appropriate measures for a home, taking into account the existing

condition, maintenance needs and heritage significance of the buildings as well as the needs of occupants. This should also consider future maintenance needs and climate change impacts and minimise the potential for measures having to be replaced ahead of schedule in the future.

Grant Applicants are expected to focus on measures that will help lower household energy bills. This includes, but is not limited to, energy efficiency measures (such as solar PV and wall, loft, and underfloor insulation) and low carbon heating technologies. We expect Grant Applicants and Buildings' Retrofit coordinators to consider value for money when designing intervention packages for households to achieve the largest practical amount of bill savings for the household.

Grant Applicants must ensure that households are given clear and accurate advice about measures to be installed and the likely impacts measures will have, including but not limited to impacts on energy bills. Grant Applicants must also ensure that post-installation evaluation takes place for every home to ensure that any issues with measures are identified and addressed.

Measures installed must adhere to requirements within PAS 2035 and be installed by an appropriately certified PAS 2030 or Microgeneration Certification Scheme (**MCS**) installer which is TrustMark registered (or equivalent). All measures must be lodged onto the TrustMark Retrofit Portal.

A new version of RdSAP (**RdSAP 10**) is expected to go live on 15th June 2025. The EPC Accreditation companies have indicated that Buildings' Retrofit assessments will not be permitted to take place in RdSAP 2012 after RdSAP 10 is in place.

EPC Accreditation companies have instead indicated that they will continue allowing the generation of RdSAP 2012 post-Buildings' Retrofit Energy Performance Reports (**EPRs**) to enable retrofits that started in RdSAP 2012 to be completed in RdSAP 2012, where the pre-Buildings' Retrofit assessment took place before the "go-live" date of RdSAP 10. In these situations, WMCA Hub will accept an EPR being generated, and an Energy Performance Certificate (EPC) will not be required.

Grant Recipients are welcome to separately generate an EPC in RdSAP 10 if they would like to.

Any new Projects that start after the RdSAP 10 "go-live" date will be required to be fully assessed in RdSAP 10 to be Trustmark compliant.

Retrofits that need to be reassessed for compliance reasons that were evidenced by RdSAP 2012 will be permitted to have a new RdSAP 2012 post-Buildings' Retrofit EPR assessment carried out for a period after the transition to RdSAP 10.

4.5. Performance Outcomes

Table 7: **Government’s Outcomes Framework for the Devolved Buildings’ Retrofit Pilot with commentary** (Section 3.5) sets out overall Outcomes Framework targets for the Scheme, and Appendix 2 sets out nominal Outcomes individual organisations are expected to achieve. These should form part of Stage 1 Development Funding and Stage 2 Delivery Funding Grant Applications and will be monitored as part of the monthly Project meetings with individual Single Point of Contact (**SPOC**).

In developing Project Grant Applications, Grant Applicants will need to consider their allocated Outcomes targets and best way of meeting these. For example, while there is some flexibility around tenure and starting EPC, the majority of homes would need to align with the tenure and EPC criteria set out in Table 7: **Government’s Outcomes Framework for the Devolved Buildings’ Retrofit Pilot with commentary** in order to meet Outcomes targets. We encourage Grant Applicants to engage with WMCA Hub as early as possible to set out their overall approach to meeting Outcomes targets.

Organisations may wish to include homes that do not meet the eligibility criteria within their Projects – for example as part of a neighbourhood wide approach. Homes that do not meet these criteria can receive funding but cannot be counted towards Outcomes targets except for the 5% of homes that can be treated without a starting EPC or tenure being specified.

Grant Applicants are encouraged to install monitoring technologies where possible (including Smart Meter Enabled Thermal Efficiency Ratings (**SMETERS**) and other smart HTC technologies) to help inform the approach for homes and monitor the effects and impacts of installations. This will not only help identify how money can best be spent in homes but also provide a useful comparison with modelled savings provided by EPCs and useful evidence to support a wider range of Buildings’ Retrofit approaches and technologies. Where Grant Applicants install monitoring technologies, these should be capable of providing data to the WMCA Hub’s DataLeNZ platform (see Section 11.2).

4.6. Eligible Expenditure

Grant Funding

The total amount of Grant funding available for homes within the Scheme is £122,390,888, once costs for regional initiatives and programme management are taken into account.

No cost caps are specified for individual homes but based on the required primary Outcomes for the programme, the maximum average Grant available per home including admin and ancillary funding is £7,667 for social housing and £16,515 for private housing. We expect that in many cases Grant Applicants will be able to exceed minimum

Outcomes targets for their Projects and that therefore the average Grant per home will be lower.

The delivery window for the Scheme will run until 30th September 2028, but all Grant funding must be spent by 31st March 2028, meaning that in the final six months of delivery, Projects will only be able to use Co-Funding. Grant funding must be claimed by 31st March 2028. In developing Grant Applications, organisations should be confident they can meet these deadlines. Grant Applicants can claim Grant funding once they have signed a GFA and Grant Offer Letter with WMCA, following approval of a Project at Stage 1 Development Funding or Stage 2 Delivery Funding. **It is our intention to treat all reasonable qualifying costs properly incurred by Grant Applicants on or after 1 November 2024 for any Pre-Works Activities as Co-Funding contribution towards any Grant**, subject to provision of relevant supporting documentation to evidence this, as part of any future audit requirements.

Capital and A&A funding

Funding awarded is capital funding, but up to 11% of the total Project expenditure (**i.e. including Grant and Co-Funding**) can be allocated to A&A spend.

Organisations have the flexibility to take an aggregated approach across Projects to stay within A&A spending limits – e.g. using A&A underspend on one Project to compensate for A&A overspend on another Project. However, organisations will be expected to stay within the overall parameters of the Scheme and should contact WMCA Hub for further guidance on this issue on specific Projects.

Each organisation should take a consistent approach to what is categorised as capital and A&A spend. As a rule of thumb, expenditure can be classified as capital where it is tied to creation of a lasting asset (e.g. the Buildings' Retrofit of a building), which can include for example assessments and surveys that lead to an installation taking place.

VAT

When working out the VAT costs for Buildings' Retrofit works, Grant Applicants must consider what is being supplied. Is there a single supply of a mixture of services which will attract a single VAT liability or are there a number of separate supplies each attracting their own individual VAT liability? In cases of uncertainty, Grant Applicants may wish to confirm with their suppliers the amount of VAT they will charge them. VAT implications of works should be considered early in the process of developing a Project to ensure costings are accurate. We recommend that Grant Applicants procure their own VAT advice where there

is uncertainty to ensure that the current Grant Application of VAT rules applies to the works that are being completed.

If an Applicant incurs non-recoverable VAT on the supply provided, they must ensure this is included within the Grant Applications and does not exceed the total Grant available/allocated. Recoverable VAT must not be included in any Grant.

Subsidy Control Rules

s must use the funding in line with the Subsidy Control requirements, as outlined in the EU-UK Trade and Cooperation Agreement (TCA) and the Subsidy Control Act 2022. It is ultimately the responsibility of s participating in the Scheme to ensure their Projects are compliant with Subsidy Control and organisations should work with their legal teams to ensure compliance. Please see Section 4.3 and below for details on the MFA rules.

Social Housing Subsidy Control

Where Grants are made to a Local Authority for use on their own social housing stock, this will not be considered a subsidy.

Where Grants are made to Private Registered Providers of Social Housing, for example Housing Associations, this will be considered a subsidy in accordance with the task of provision of affordable, energy efficient social housing under Services of Public Economic Interest.

Grant Applicants who are a Private Registered Provider of Social Housing that receives state support of less than £725,000 across three financial years for the above-mentioned task must declare this on their Grant Application (Development Plan). They will be exempt from subsidy control if the amount of Grant funding received for the Buildings' Retrofit Pilot, in addition to the total amount of state support that they have already received over the relevant period for the above-mentioned task, totals less than £725,000. Any subsidy awards made that are over £100,000 will be declared on the subsidy transparency database.

Grant Applicants who are a Private Registered Provider of Social Housing that receives state support of more than £725,000 across three financial years for the above-mentioned task must declare this on their Grant Application. Their Grant Application will be assessed by WMCA Hub in accordance with the SCA as it applies to a body tasked with provision of affordable, energy efficient social housing. Any subsidy awards made that are over £100,000 will be declared on the subsidy transparency database.

Grant Applicants who are a Non-registered Provider of Social Housing or a Registered Charity that owns social housing will have their Grant Application assessed in accordance with the SCA. Any subsidy awards made that are over £100,000 will be declared on the subsidy transparency database.

Private Housing Subsidy Control and Subsidy Declaration

Upgrades to PRS properties will constitute a subsidy to landlords under the Subsidy Control Act (2022). LAs will be required under the relevant funding agreement to ensure that the subsidy to each PRS landlord does not exceed the MFA limit of £315,000⁹. This includes the value of any WMLG support to be given to the landlord, in addition to any previous subsidy received by the landlord over the current and previous 2 financial years. This ensures no single landlord receives excessive amounts of funding and reduces the administrative burden on Local Authorities of conducting a full principles assessment under the Act.

To enact this requirement, during the sign-up process LAs will need to notify the relevant PRS landlord:

- explaining that the Local Authority is proposing to give to the landlord a subsidy by way of MFA,
- specifying the gross value amount of the assistance, and
- requesting written confirmation from the landlord that the MFA threshold will not be exceeded by the landlord receiving the proposed assistance.

The landlord will then need to confirm the above in writing. Prior to providing the upgrades, Local Authorities will need to confirm in writing to the relevant PRS landlord that:

- The subsidy is given as MFA,
- The date on which it is given, and
- The gross value amount of the assistance.
- LAs are responsible for completing their own subsidy control assessment.

Where the total value of all subsidies to a single PRS landlord exceeds £100,000, the LA will need to comply with the transparency requirements of the Act. For further guidance, see the Statutory Guidance document available from the Government¹⁰.

Charity Owned Rental Properties

⁹ This limit is set by s.36 of the Subsidy Control Act (2022).

¹⁰ Department for Business and Trade (2025) [UK subsidy control regime: statutory guidance](#)

Properties owned by charities can qualify for the WMLG funding, subject to the same PRS rules as stated throughout this Section 4 (with 30% Co-Funding contributions for up to four properties). However, any charity-owned properties must identify as PRS, not social housing. This must be verified by the LA, who cannot install upgrades with WMLG funding if the charity is a Registered Provider of social housing.

4.7. Co-Funding

A minimum of 50% Co-Funding is required for social rented homes; additional Co-Funding can be included by the Grant Applicant.

A minimum of 30% Co-Funding is required from private landlords for up to four properties to be paid prior to commencement of works.

No Co-Funding contribution is required from low-income owner occupiers. However, it may be desirable to allow owner-occupiers to make a voluntary contribution to the cost of works in some cases—for example to allow a greater amount of work to be done on a home.

Grant Applicants should note that the Grant value cannot be increased following the submission of a Grant Application. Therefore, any cost increases must be covered by the Grant Applicant.

Any additional funding (public grant, private financing or other) can count towards the Grant Recipient’s Co-Funding requirements. Please see Section 10 for further guidance on finance and sourcing alternative funding.

4.8. Quality Standards

Grant Applicants must ensure all work done adheres to all relevant building, and construction products, regulations and requirements, particularly those that are considered safety critical and in line with industry best practice. Grant Applicants must also ensure any installations are in line with all concurrent legal requirements for manufacturers to ensure that products are safe at the time of installation.

Grant Applicants must adhere to all appropriate safety and construction standards in line with PAS2035/2030:2023, including ensuring sufficient checks are in place to ensure installers are compliant with the same standards.

All Projects must adhere to “PAS 2035:2023 Retrofitting dwellings for improved energy efficiency specification and guidance” (PAS 2035:2023). PAS 2035/30:2023 was published

in September 2023 and is freely available to download at the British Standards Institute (BSI)'s webstore¹¹.

PAS 2035 requires energy efficiency measures to be installed by an installer who is certified to PAS 2030 for the relevant measure. All installers must be TrustMark registered, or able to demonstrate registration with a Scheme which has been deemed equivalent by the Secretary of State.

PAS 2035 also requires low carbon heat measures to be installed by MCS certified installers. Where connecting to a communal heat network/district heating Scheme, this must be done in accordance with the Heat Trust Consumer Protection Scheme. Once regulations introduce mandatory minimum heat network technical requirements, expected in 2025, the installation of communal and district Schemes must comply with these requirements and follow the processes set out under the Heat Network Technical Assurance Scheme (HNTAS). Prior to technical standards regulation, whilst not a formal requirement, the installation of communal and district heating systems should aim to be in accordance with CIBSE's Code of Practice 1 (2020).

Sufficient checks must also be in place to ensure installers and measures are compliant with these same standards. We are now in a transition period whereby the 2019 standards will be withdrawn on 30th March 2025 and replaced with the new 2023 standards.

Post Buildings' Retrofit Evaluation

In order to ensure a consistent approach to Buildings' Retrofit evaluation and help to evaluate the impact of retrofits undertaken through the Pilot, WMCA Hub will be providing a best practice evaluation questionnaire to be used on all homes. While an initial evaluation must be completed shortly after practical completion of works to enable TrustMark lodgement, this does not allow a suitable time period to elapse in order for the impact of works to be gauged properly. For example, if works are completed during the summer, then the evaluation will not be able to take into account how the property performs during the winter. Therefore, WMCA Hub proposes to undertake a second round of evaluation on all homes at a suitable date 6-12 months following completion of works using the DataLeNZ platform

TrustMark Lodgement

Lodgement of works through the TrustMark Retrofit Portal is mandatory. Please note compliant installation measures funded through the Scheme should be lodged using the

¹¹ BSI (accessed 2025) <https://knowledge.bsigroup.com/products/retrofitting-dwellings-for-improved-energy-efficiency-specification-and-guidance-2?version=standard>

Devolved Buildings' Retrofit Pilot drop down lodgement menu on the TrustMark Retrofit Portal.

Grant Recipients must engage with TrustMark throughout the delivery of their Project. In accordance with TrustMark guidance, works should be lodged within a maximum of 30 Working Days of completion. Further to this, WMCA Hub will be analysing and quality assurance data throughout the delivery of the Project to ensure that all eligible measures and homes reported to us are being lodged in the TrustMark Retrofit Portal.

Grant Recipients will be required to provide the data needed for WMCA Hub to do this. The data will include a pre-installation SAP score, TrustMark Project reference number, and TrustMark lodgement number. The process for providing this data will be set out in the GFA. Therefore, Grant Recipients must consider this in the planning and procurement activities for their Project. For example, Grant Recipients could include a service-level agreement with organisations who will be lodging the measures with TrustMark to ensure this is done in a timely manner. Further to this, if evidence of lodgment with TrustMark cannot be provided for measures, and Grant funding has been claimed for them, then the associated costs for these measures could be subject to claw back given they would not be classed as eligible measures.

Climate Adaptation

WMCA is committed to considering current and future climate scenarios, including overheating risk and indoor air quality risk, when developing policies to deliver Net Zero. PAS 2035/2030 requires a whole house approach to home Buildings' Retrofit Projects and ensures that the risks of unintended consequences are minimised. The guidance and requirements for climate resilience and adaptation in Buildings' Retrofit have been strengthened in PAS 2035/2030:2023. Grant Applicants will be expected to consider climate adaptation risks in developing and implementing Projects, and a Climate Adaptation Checklist is available at Appendix 3 to support this.

Supply Chain and Procurement

Grant Applicants are encouraged to support and boost local green growth by considering local and small and medium-sized enterprises (SME) installers, whilst investing in the skills and supply chains necessary to meet net zero. Grant Applicants should consider the role of SMEs in the supply chain and ensure that barriers to participation are minimised in their procurements. Evidence of this will be required in the Development Plan and Public Buildings Application Form. Please see Section 6.2.2 for more details on social value.

Grant Applicants are also encouraged to consider and implement all relevant Public Procurement Notices in their procurement activity. A summary of relevant public procurement policy can be found at the following link:

<https://www.gov.uk/government/collections/procurement-policy-notes>.

4.9. Customer Journey Support

Some funding has been set aside at the regional level for the provision of **Customer Journey Support**, including a range of services aimed at supporting private households through the process from Grant Application to handover. These are expected to include Grant Application processing (including any necessary checks), supporting referrals, land registry checks, acting as a point of contact for households and provision of advice on energy and income maximisation.

WMCA Hub will undertake further consultation with Local Authorities to scope out these services further and what can be undertaken at the local level and what should be provided at the regional level. This guidance will be updated with further information on Customer Journey Support provision.

4.10. Documents Required at Grant Application Stages

Mandatory documents at Stage 1 Development Funding:

- Development Plan (Domestic)

Mandatory documents at Stage 2 Delivery Funding:

- Development Plan
- Project team
- Buildings' Retrofit Assessments
- Climate Change Adaptation Checklist
- Detailed risk register (WMCA Hub provided, and common risks prefilled)
- Project programme and execution plan
- Projected spend forecast baseline
- Procurement timetable
- Planning obligations/Conservation/Heritage impact

5. Public Sector Buildings

This Section 5 is intended as a guide to what public Buildings' Retrofit Projects can be funded within the scope of the Scheme but is non-exhaustive. Grant Applicants can suggest alternative approaches to meeting programme Outcomes and should engage early with WMCA Hub to discuss these.

5.1. Eligible Organisations

Eligible Organisations must meet the definition of a 'public authority' as defined by the Procurement Act 2023 on the date the Grant Application is submitted. This means an Eligible Organisation that is:

- a) wholly or mainly funded by public funds; or
- b) subject to public authority oversight; and
- c) does not operate on a commercial basis

Eligible Organisations must be located within the West Midlands County and must be one of the following:

- Birmingham City Council
- Coventry City Council
- Dudley Metropolitan Borough Council
- Sandwell Metropolitan Borough Council
- Solihull Metropolitan Borough Council
- Walsall Metropolitan Borough Council
- City of Wolverhampton Council
- Emergency Services (e.g. WM Ambulance Service, WM Fire Service, WM Police, etc.)
- Community and mental health NHS trusts and foundation trusts (i.e. all non-acute trusts)
- All schools in the state education system (i.e. maintained schools, academies, multi-academy trusts and free schools)
- Further education institutions (i.e. colleges).

GPs are not eligible unless they are Contracting Authorities of an eligible body (including NHS trusts) that either own or have a long-term lease agreement with responsibility for maintenance of the buildings not including NHS property services as these are semi-private.

Public Corporations and private sector organisations are not eligible. Registered charities are also not eligible, unless they are also non-departmental public bodies as defined by the Cabinet Office.

Some Grant Applicants who are not eligible for the Scheme, may still be eligible to apply for funding through the national PSDS. These include:

- Central Government departments and their arm's length bodies.
- Acute and cancer NHS trusts and foundation trusts.
- Higher education institutions – these must satisfy the eligibility requirements related to the Procurement Act 2023.

5.2. Grant Funding Allocation

The Scheme will run from 2025/26 to 2027/28. Grant Applicants will need to decide the profile of Grant spend required across each financial year to deliver the Project. The basis for allocating funding to Local Authorities and non-LA Public Sector Organisations with public building stock in the region is set out in Section 3.4. Details of allocations to individual organisations can be found in Appendix 2.

For non-LA Public Sector Organisations, funding has been set aside as a single pot, based on the aggregated public sector floor area owned by this cohort. This represents 10% of the available Project funding within the Scheme (£3,522,821). However, these organisations are also able to access funding through the relevant LA, depending on what the LA's plans are for its allocation. For example, a LA may choose to allocate some of its funding to another organisation as part of a place-based approach or allocate some funding to an academy trust in order to meet the soft spending cap in relation to schools (30% of all Grant funding across the Scheme).

We recommend that non-LA Public Sector Organisations first engage through their Local Authorities on the buildings they are interested in putting forward for funding. Local Authorities should consider using their Funding Allocation for their own buildings and for wider public sector buildings. Where this is not possible, non-LA Public Sector Organisations can apply directly to WMCA Hub for funding.

Across the Scheme, it is expected that approximately 30% of all expenditure should go to school buildings. This is a soft cap agreed between DESNZ, Department for Education and WMCA. The WMCA Hub will monitor this and approve Projects accordingly.

The funding drawdown and the Grant Application template will be split into two stages— Stage 1 Development Funding, and Stage 2 Delivery Funding. The Stage 1 Grant Application window for public building Funding Allocations are different for LAs and non-LA public sector organisations. See Section 6 for more detail on this. Stage 1 will require fewer and less depth of detail than in Stage 2, and the 15% of Grant funding available at this stage will be quicker to release than Stage 2.

5.3. Eligible Buildings

In order to receive Grant funding, buildings must follow the eligibility criteria set out in Section 5.1, and follow the guidelines and requirements on subsidy control, as set out in Appendix 6. Public sector organisations must consider and comply with the Subsidy Control Act 2022 when receiving Grant. For leased buildings, evidence of leasing arrangements and renewals are required to avoid subsidy misuse. Private Finance Initiative (**PFI**) buildings must also follow specific rules and provide documentation to prove compliance. Details on the evidence requirements for leased and PFI buildings are set out in Appendix 6.

5.4. Eligible Measures

Eligible measures may include any energy efficiency measure listed in the example table of measures (see Appendix 7) or those compatible with the latest version of the Simplified Building Energy Model (SBEM). The installation of heating systems that are solely fuelled by fossil fuels is not eligible for Grant funding, but Grant funding can be used for enabling or preparatory works that are needed to ensure successful installation. Measures that are not listed in the example table can also be considered; however, these would need to be approved on a case-by-case basis.

Grant Applicants should take a whole building approach, as set out in Section 3.1.

Grant Applicants are expected to meet their minimum Outcomes by focusing on any measures that will reduce direct carbon emissions. This includes, but is not limited to:

- building fabric improvements;
- low carbon heating systems (like heat pumps, solar thermal and district heating);
- heat distribution, controls and hot water systems; and
- building energy management systems

Assuming minimum Outcomes for Direct Emissions savings can be met, Grant Applicants are encouraged to consider measures that contribute to Indirect Emissions savings, as these may help to make a project more viable by increasing energy bill savings. Indirect measures include:

- system efficiency improvements in cooling and ventilation systems;
- energy efficient lighting
- renewable electricity generation

We expect Grant Applicants and delivery partners to consider value for money when designing Projects for their buildings to achieve the optimal direct emission savings.

5.5. Performance Outcomes

Table 7: **Government’s Outcomes Framework for the Devolved Buildings’ Retrofit Pilot with commentary** (Section 3.5) sets out overall Outcomes Framework targets for the Scheme, and Appendix 2 sets out nominal Outcomes individual organisations are expected to achieve.

In developing Project Grant Applications, Grant Applicants will need to consider their allocated Outcomes targets and the best way of meeting these. For example, individual annual direct carbon emissions savings should be met using measures listed in the example table in Appendix 7. We encourage Grant Applicants to engage with WMCA Hub as early as possible to set out their overall approach to meeting Outcomes targets as well as wider co-benefits.

Organisations may wish to include buildings that are not in scope or do not meet the eligibility criteria for the Scheme—for example, where an effective place-based approach would include a small number of ineligible buildings/parts of buildings. Buildings that do not meet these criteria may receive funding but cannot be counted towards Outcomes targets for direct carbon emissions savings.

The overall carbon savings target for public buildings is 3.6 ktCO₂/yr, which is based on an effective Grant Carbon Cost (GCC) of £445 per tonne of direct carbon saved over the lifetime of the measures (£445/tCO₂e LT and using an average 22-year measure lifetime). There is no GCC cap on Projects—the only mandatory outcome for Projects is an annual carbon saving— but Projects should demonstrate good value for money, and the GCC average provides a guideline for this.

The public buildings Grant Application template can be used to work out the associated GCC for selected measures and tailor the Grant Application to a more cost-effective GCC. This might include requesting Grant funding for the most effective direct-carbon-saving measures, and Co-Funding the in-direct (lighting, solar PV, etc.) and/or least effective direct-carbon-saving measures. Depending on how Projects develop and what the most effective measures are, Grant Applicants should engage early with WMCA Hub on Project Outcomes and approaches to delivering them.

Grant Applicants are encouraged to take a coordinated approach to their buildings and sites. Some Projects will be more cost effective to decarbonise than others, and the better value for money Projects can subsidise the complex-to-decarbonise or less cost-effective buildings. WMCA Hub will work with stakeholders to understand where a balance can be struck across buildings and tenures within a Grant Application, or across the Scheme as a whole.

5.6. Quality Standards

WMCA Hub is committed to a "Whole Building" approach to non-domestic Buildings' Retrofit, as detailed in Section 3.1. While use of PAS 2038 is not mandatory, it is encouraged, and Projects must be consistent with the aims of PAS 2038:

- Improve the functionality, viability, and durability of buildings;
- Improve comfort, well-being, and the health and safety of occupants and visitors;
- Improve the energy efficiency of buildings;
- Reduce the environmental impact of buildings;
- Protect and enhance architectural heritage;
- Minimise the performance gap;
- Avoid unintended consequences.

It is expected that some of these aims will be reflected in the co-benefits identified. Grant Applicants could suggest appropriate metrics for these as part of their Grant Application (see Public Buildings Application Form). Mandatory reporting would be light touch for these (see Section 6.2.2 and 7 for more details).

All Projects must have an appointed Buildings' Retrofit Lead Professional and a Buildings' Retrofit Designer. These are not new roles and do not require additional qualifications to perform. The Buildings' Retrofit Lead Professional is a suitably qualified project manager (i.e. a project manager with relevant construction experience, and the Buildings' Retrofit Designer a suitably qualified building architect/architectural technologist/etc.

All Projects must consider good-practice principles, guides and standards when developing and delivering public sector Projects. A detailed list of recommended sources is in Appendix 9.

5.7. Non-Domestic Buildings' Retrofit Assessment

A Buildings' Retrofit Assessment must be carried out for all buildings to be retrofitted. The Buildings' Retrofit Assessment is not required for Stage 1 Development Funding Grant Applications but must be provided for all Stage 2 Delivery Funding Grant Applications. The Assessment must contain the minimum details set out in Section C of Appendix 8.

It is strongly recommended that the assessment is carried out by a qualified assessor, such as an accredited energy assessor (Level 4 or 5 LCEA). If proposing to use a Level 4 or 5 NDEA, you must submit a CV, detailing any additional relevant Continual Professional Development and courses from your qualified assessor. A Chartered Architect, RICS Surveyor or Chartered Buildings Services Engineer (CIOB) may also have the relevant skills and experience to carry out a robust Buildings' Retrofit Assessment.

If the building to be retrofitted is of traditional construction (usually pre-1919, solid walled) then the Assessor must hold the Level 3 Award in Energy Efficiency for Older and Traditional Buildings.

The Buildings' Retrofit Assessment should address the following key subjects:

1. Context
2. Energy use
3. Building Fabric
4. Heating (and cooling) system
5. Ventilation system
6. Lighting
7. Power use
8. Renewable Energy Generation
9. Summary of recommendations

See Appendix 8 for details of the information required under these headings.

5.8. Eligible Expenditure

Grant Funding

The total amount of Grant funding available for public buildings within the Scheme is £35,228,209, once costs for regional initiatives and programme management are considered.

The delivery window for the Scheme will run until 30th September 2028, but all Grant funding must be spent by 31st March 2028, meaning that in the final six months of delivery, Projects will only be able to use Co-Funding. Grant funding cannot be claimed after 31st March 2028. In developing Grant Applications, organisations should be confident they can meet these deadlines.

Grant Applicants can claim Grant funding once they have signed a GFA with WMCA. **It is our intention to treat all reasonable qualifying costs properly incurred by Grant Applicants on or after 1 November 2024 for any Pre-Works Activities as a Co-Funding contribution towards any Grant**, subject to provision of relevant supporting documentation to evidence this.

An example list of Pre-Works Activities qualifying as Eligible Expenditure is as follows, and as listed in the GFA:

- Buildings' Retrofit assessments, feasibility studies and eligible site investigations;
- design support in putting together your Grant Application for Stage 1 Development Funding or Stage 2 Delivery Funding;
- building recruitment;

- preparatory building works;
- project management, reporting and governance hiring activities; and
- any other compliant activities as notified to us in writing.

Capital and A&A funding

Funding awarded is capital funding, but up to 10% of the total Grant can be converted to A&A revenue spend.

Organisations have the flexibility to take an aggregated approach across Projects to stay within A&A spending limits – e.g. using revenue underspend on one Project to compensate for revenue overspend on another Project. However, organisations will be expected to stay within the overall parameters of the Scheme and should contact WMCA Hub for further guidance on this issue on specific Projects.

Each organisation should take a consistent approach to what is categorised as capital and revenue spend. As a rule of thumb, expenditure can be classified as capital where it is tied to creation of a lasting asset (e.g. the Buildings' Retrofit of a building), which can include for example detailed design works that lead to an installation taking place.

VAT

When working out the VAT costs for Buildings' Retrofit works, Grant Applicants must consider what is being supplied. Is there a single supply of a mixture of services which will attract a single VAT liability or are there a number of separate supplies each attracting their own individual VAT liability? In cases of uncertainty, Grant Applicants may wish to confirm with their suppliers the amount of VAT they will charge them. VAT implications of works should be considered early in the process of developing a Project to ensure costings are accurate. We recommend that Grant Applicants procure their own VAT advice where there is uncertainty to ensure that the current Grant Application of VAT rules applies to the works that are being completed.

If an Applicant incurs non-recoverable VAT on the supply provided, they must ensure this does not exceed the total Grant. Recoverable VAT must not be included in any Grant.

UK Subsidy Control Rules

Grant Recipients must use the funding in line with the Subsidy Control requirements, as outlined in the EU-UK Trade and Cooperation Agreement (TCA) and the Subsidy Control Act 2022. It is ultimately the responsibility of Grant Recipients participating in the Scheme to

ensure their Projects are compliant with Subsidy Control and organisations should work with their legal teams to ensure compliance. See Appendix 6 for further details on subsidy control.

5.9. Co-Funding

The minimum Co-Funding contribution for public building Grant Applications is 12%. This is calculated as 12% of the total Grant costs for eligible measures.

The Grant Applicant must confirm that they have the funds to meet the Co-Funding contribution within the Grant Application form and Grant Framework Agreement. A letter from the Head of Finance or equivalent will be required for confirmation of Co-Funding.

Grant Applicants should note that the Grant value cannot be increased following the submission of a Grant Application, unless agreed otherwise through Grant reallocation process (see Section 6.3). Therefore, any cost increases must be covered by the Grant Applicant.

Any additional funding (public grant, private financing or other) can count towards the Grant Recipient's Co-Funding requirements.

5.10. Developing Projects

Grant Applicants need to demonstrate that proposed Projects meet the requirements of the Scheme. See the Public Buildings Application Form and Section 5.11 for the evidence required to submit at each stage.

Grant funding can only be awarded where the measures concerned have not been fully funded from another funding source.

Evidence required

Grant Applicants must sign and return the Grant Framework Agreement confirming compliance with the additionality criteria. This should be signed by the Grant Applicant's Authorising Official or Chief Financial Officer, or equivalent. Additionality criteria will also be checked throughout the assessment of the technical design, cost evidence and Project programme.

The Scheme will not Grant any subsidies that are of particular interest, as defined in Section 3 of the Subsidy Control Regulations 2022. Details of subsidy control and eligible buildings within this (leasing arrangements, buildings with a PFI, etc.) are detailed within Appendix 6.

5.11. Documents Required at Grant Application Stages

Mandatory documents at Stage 1 Development Funding:

- Public Buildings Application Form (tabs 2 to 10)
- Valid Display Energy Certificate (DEC) (if required)

Mandatory documents at Stage 2 Delivery Funding:

- Public Buildings Application Form (please fill all tabs, including those coloured in blue (11 - 13). Do not update tabs 7 (Indicative Measures) and 9 (Estimated Costs).
- Retrofit Assessment, including options appraisal
- Feasibility studies for any large or complex measures, e.g. connection to district heating (if relevant)
- Retrofit Design documentation
- Assessment of Significance (if relevant)
- Energy savings estimations (WMCA can support Applicants to produce savings calculations, and will carry out a detailed review on all calculations submitted. Calculations may be supported by modelling)
- Detailed risk register
- Climate Change Adaptation Checklist
- Proposed Programme
- Organogram with qualifications and experience of key team members
- Planning Permission (if relevant)
- Leasehold renewal evidence (if relevant)
- Itemised cost breakdown
- Procurement strategy

6. Applying for Grant Funding

6.1. Grant Funding Stages, Drawdown and Approval Process

6.1.1. Grant Funding Stages and Grant Application Windows

Allocated Grant funding will be made available to Eligible Organisations through a two-stage drawdown process. Grant payments will be paid monthly or quarterly in arrears, subject to the Grant Recipient claiming on Eligible Expenditure.

Stage 1 Development Funding will release funding for Project Development (15% of funding allocation), and Stage 2 Delivery Funding for Project Delivery (85% of funding allocation). Funding for these two stages is subject to submission and scrutiny of one Grant Application for domestic funding pots and one for public buildings funding. For domestic Schemes this is the Development Plan, and for public buildings this is the Public Buildings Application Form. This is split as follows:

Table 8: breakdown of the details needed at each Grant Application stage, and their associated Grant Application windows

Stage	Details
Stage 1 Development Funding – Project Development	<p>Submission of Stage 1 Development Funding detail in a Development Plan and/or Public Buildings Application Form by 16th October 2025. Stage 1 Development Funding detail requirements are highlighted within each Grant Application form.</p> <p>Non-LA Public Sector Organisations applying directly to the WMCA Hub must submit a Stage 1 Development Funding Grant Application by 15th January 2026. These bids will be evaluated together and funding allocated to the strongest bids.</p>
Stage 2 Delivery Funding – Project Delivery	<p>Submission of a full Development Plan (Stage 1 Development Funding and Stage 2 Delivery Funding detail) for social housing only Projects, by 15th January 2026.</p> <p>For all other Projects (WHLG & Local Authority PSDS) a Grant Application must be submitted that equates to a minimum 30% of the allocated Grant by 16th July 2026 (for any Grant Application of less than 30%, the shortfall could then become available for reallocation although a degree of flexibility at the application stage will be considered).</p>

Stage	Details
	<p>For Local Authority PSDS which may incorporate a series of phased stage 2 Grant Applications, the final phased application must be submitted by no later than 30th November 2026 (any remaining Grant not claimed via a Grant Application will be available for reallocation).</p> <p>All remaining Grant Applications must be submitted by no later than 14th January 2027 (any remaining Grant not claimed via a Grant Application will be available for reallocation).</p> <p>WMCA Hub will populate a Business Case template using Stage 2 Delivery Funding Grant Applications and arrange for approval of the Business Case through the WMCA SAF process as required.</p>

Large Housing Associations with a funding allocation (see Appendix 2) must communicate their intention to use their funding allocation within the above Grant Application windows by **30th June 2025**. WMCA Hub communications will be sent individually to each large Housing Association to confirm their intention to apply for their allocated funding. If WMCA Hub do not receive this confirmation, the WMCA Hub will class any allocated Grant funding as unwanted and will reallocate accordingly. Please see Section 6.3 for details on how this process will work.

Eligible Local Authorities and Housing Associations may apply directly at Stage 2 Delivery Funding if they have all available Stage 2 Delivery Funding information. Please refer to the Development Plan and Public Buildings Application Form for a full list of detailed requirements at both stages.

Non-LA Public Sector Organisations applying directly to the WMCA Hub must submit a Stage 1 Development Funding Grant Application by **15th January 2026**. These bids will be evaluated together and funding allocated to the strongest bids. This will be determined by a combination of its performance against the primary outcome (decarbonisation), as well as wider qualitative and quantitative factors comprising the proposed Project, e.g., deliverability, value-for-money, strategic fit, secondary Outcomes and co-benefits.

Grant funding is split into two stages to give more organisations the chance to develop Projects and get greater certainty over Project costs and delivery plans before starting delivery. We anticipate that this will support delivery of better Outcomes, allow appropriate

time for organisations to plan, mobilise and deliver Projects, reduce error and fraud, and drive up the standard of delivery across the sector.

Subject to readiness, Local Authorities can put forward Stage 1 Development Funding or Stage 2 Delivery Funding Grant Applications that cover single Projects or funding pots, or multiple allocated funding pots. We would recommend that where Grant Applications can be aggregated into a single Grant Application, doing so will reduce workload, increase efficiencies and allow for quicker sign off funding, particularly at Stage 2 Delivery Funding.

WMCA Hub can support Eligible Organisations through the process of Project development and writing of Grant Applications (see Section 9 for more details), as well as a Managed Support Service for full Buildings' Retrofit programme management support.

6.1.2. Approval Process and Evaluation

Grant Applications for both Stage 1 Development Funding and Stage 2 Delivery Building will be evaluated by the Panel, which sits monthly. Evaluation of Grant Applications will be carried out to determine Project compliance and suitability for funding. Based upon the detail and content of each submission, the WMCA Hub may request additional information from the Grant Applicant to determine approval or otherwise.

The dates for these Panels are scheduled within Table 3: **Key Buildings' Retrofit Pilot Panel Grant Application submission and panel dates.**, Section 3.2. Applications to be considered by the Panel should be submitted no later than 10 Working Days before the set Panel evaluation date.

The Panel outcome will be that the Grant Application is either:

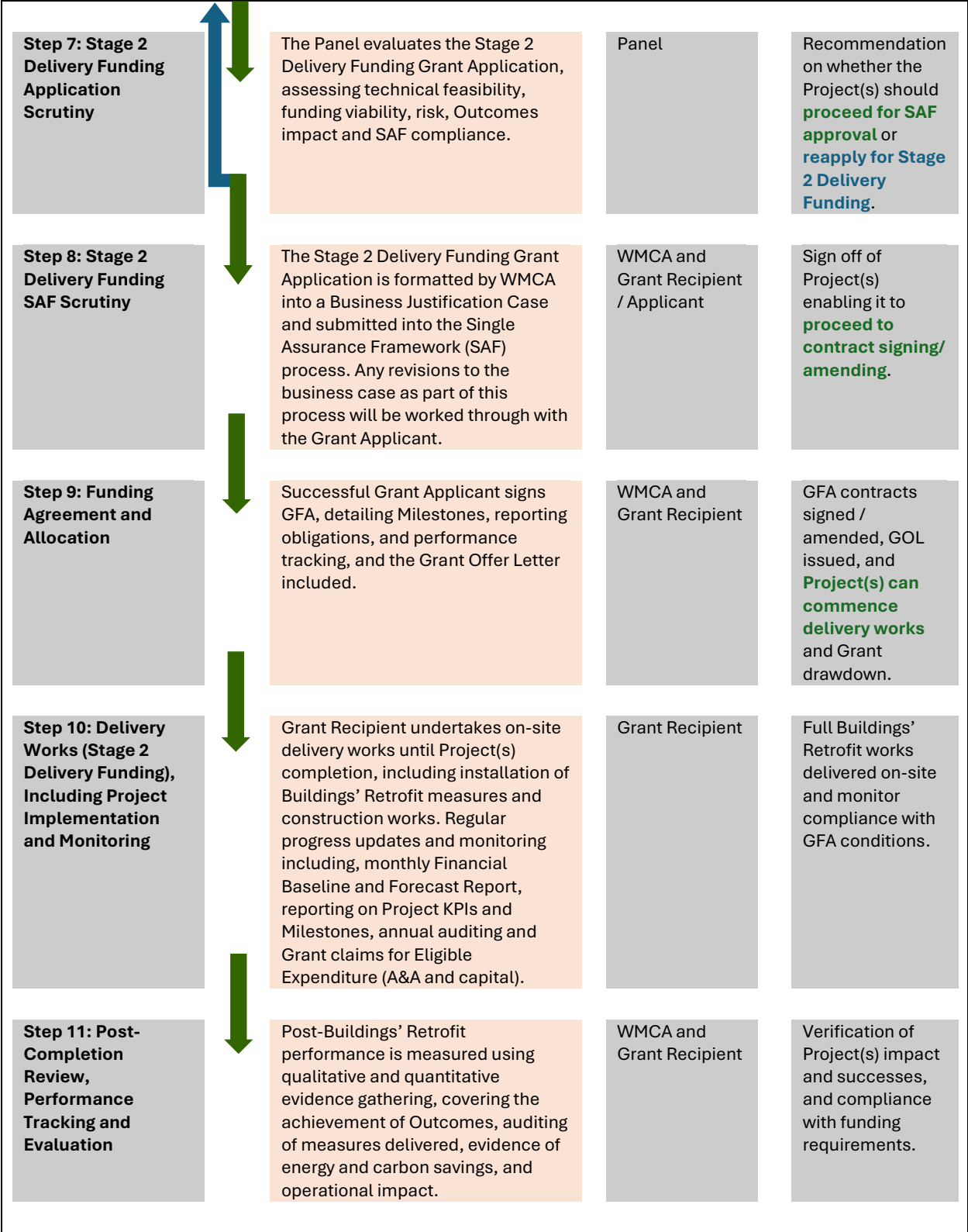
- 1) Approved, with comments, and progresses onto signing of Transaction Documents;
or
- 2) Not approved, with request for more information and re-submission at a following Panel.

Following approval by the Panel of the relevant stage, each stakeholder will be provided a formal GFA to sign, including a Grant Offer Letter (**GOL**), confirming the level of approved Grant funding, and a Data Sharing Agreement (**DSA**) which will form part of the GFA.

The overall approval process is contained within Table 9 (below).

Table 9: Approval process diagram for Project(s) applying for Grant funding through the Scheme

Step	Action	Responsible	Outcome
Step 1: Project Identification and Application Support	Eligible stakeholder identifies eligible Buildings' Retrofit Projects based on Scheme Guidance, building stock, carbon savings potential, and strategic fit of buildings.	Local Authority, Housing Association, Public Sector Body	Identified Projects ready for initial assessment.
Step 2: Stage 1 Development Funding Application	Submission of a high-level proposal, outlining Project(s) objectives, estimated costs and baselines, expected performance against Outcomes. Requires Stage 1 Development Funding detail of the Development Plan or Public Buildings Application Form. Stage 1 Development Funding can be skipped if Stage 2 Delivery Funding detail is available.	Applicant	Application made for 15% development funding. Some Projects may proceed directly to Stage 2 Delivery Funding.
Step 3: Stage 1 Development Funding Application Scrutiny	The Panel evaluates the Grant Applicant's eligibility, the Grant Application, strategic alignment, feasibility, and funding potential.	Panel	Decision made whether Project(s) should proceed to contract signing or reapply for Stage 1 Development Funding.
Step 4: Funding Agreement and Allocation	Successful Grant Applicant signs GFA, and Data Sharing Agreement with the GFA detailing Milestones, reporting obligations, and performance tracking, and the Grant Offer Letter included.	WMCA and Grant Recipient	GFA (including DSA) signed, GOL issued. Project(s) can commence development works and Grant drawdown.
Step 5: Development Works (Stage 1 Development Funding)	Grant Recipient undertakes on-site development works, including monthly reports, monitoring and Grant claims for Eligible Expenditure (A&A and capital).	Grant Recipient	Project(s) are fully scoped, including household sign-ups, building and measure details.
Step 6: Stage 2 Delivery Funding Application	Submission of a detailed Grant Application (with Stage 1 Development Funding and 2 details), including updated costs, baselines and forecasts, technical feasibility, risk management, procurement strategy, and expected Outcomes.	Grant Applicant/Grant Recipient	Fully documented Project ready for technical and financial evaluation.



6.1.3. Grant Funding Drawdown and Grant Payment

Payment of Grant will begin once the GFA (including the DSA) and GOL has been signed between the WMCA and Grant Recipient at Stage 1 Development Funding (or Stage 2 Delivery Funding if applied to directly). Grant Recipients must commence the Funded Activities within two months of signing the GFA, otherwise allocated funding may be subject to clawback from WMCA.

Stage 1 Development Funding Grant Recipients will be able to begin drawing down on up to 15% of their allocated Grant funding.

All Grant payments will be made in arrears to the Grant Recipient on spend incurred following the submission of a Grant Claim Form, along with the relevant supporting evidence of Eligible Expenditure. Claims can be made on a monthly, or at least quarterly basis, and submitted within the period of 10th Working Day of the calendar month.

Each Grant Applicant will have an obligation to provide the WMCA with an independent assurance audit that the Grant has been used for delivery of the Project in accordance with the requirements of the GFA

Pre-Launch

The WMCA Hub issued a Letter of Intent¹² in March 2025, providing commercial comfort to Eligible Organisations to continue Pre-Works Activities in the lead up to the Scheme's launch and any GFA signed afterwards. The Letter of Intent is not legally binding and constitutes an intention to consider any qualifying costs incurred from 1st November 2024 as Co-Funding contribution towards any Grant received, subject to signing of a GFA.

Stage 1 Development Funding: Project Development

Eligible Grant Applicants will be able to access up to 15% of their Funding Allocation up front for developing their pipeline. Development funding can be used for recruiting buildings, community/building engagement activities, supply chain and delivery partner engagement, and for carrying out Buildings' Retrofit assessments, feasibility studies and any monitoring and data collection. This will mainly comprise A&A costs, but some of these activities could be classed as capital spend, so long as these definitions are consistently applied (please see Section 4.6 and 5.8 for more detail on using A&A spend).

Funding release will be subject to submission of a valid Development Plan or Public Buildings Application Form (containing all Stage 1 Development Funding detail), and evaluation at the Panel (see Section 6.1.2 for details on the evaluation process). Stage 1

¹² WMCA (2025) [The Building Retrofit Pilot](#)

Development Funding Grant Applications will be assessed against the overall Scheme objectives, Outcomes Framework targets, minimum eligibility criteria and technical aspects.

Grant Applicants are encouraged to engage through the TAF to explore Project ideas, discuss alternative approaches and strengthen Grant Applications.

WMCA Hub encourages Grant Applicants with funding allocations for multiple pots, or multiple organisations collaborating on Projects, to make one Stage 1 Development Funding bid for all of their Projects that could be funded by their allocated Grant. This will help to reduce the number of Grant Applications made and the associated process time requirements.

Stage 2 Delivery Funding: Project Delivery

Grant Applicants will be able to apply for the remaining delivery funding for their Projects, subject to passing through Stage 2 Delivery Funding. The required detail for the Stage 2 Delivery Funding Grant Application is greater than Stage 1 Development Funding and purposefully should incorporate data gathered the funded development stage. This more detailed submission must include full delivery costs, list of works and measures, performance against Outcomes, management, resourcing and procurement plans, and more—see Section 4.10 and 5.11 for more details on evidence requirements. Compliance with the Outcomes Framework, targets within and all necessary standards stipulated for participation in the Scheme will also be reviewed at this stage. Once through this stage, funding will be released for delivery of full capital works.

Monitoring and Evaluation

Once a Project is in the delivery stage, it is expected that all monitoring and evaluation requirements are met from the outset. All requirements are detailed within the monthly reporting templates, and will include:

- monthly Project monitoring and reporting (financial performance, KPIs and Milestones) through the designated WMCA Hub SPOC;
- compliance with the data specification (Data Sharing Agreement) and receipt of data; and
- evaluation of Outcomes in line with the requirements detailed in Section 6.1.2 and 3.5.

All Project Change Requests will be approved through the Panel to access greater funding or for different measures.

More details are given on Monitoring and Reporting in Section 0.

6.2. Developing Grant Funding Applications

All Grant Applicants seeking to prepare a Grant Application at Stage 1 Development Funding or Stage 2 Delivery Funding are encouraged to contact WMCA Hub as early as possible for support and guidance (see Section 12 for contact details). Early engagement will:

- Allow organisations to benefit from the regional level support available (see Section 9.0).
- Highlight opportunities for improving Project development or delivery sooner in the Grant Application process, ensuring a high quality of Grant Application is submitted to the WMCA Hub.
- Help ensure that the process for evaluating and approving Grant Applications can work efficiently and support organisations to access funding quicker.

Organisations with Grant Funding Allocation

For Local Authorities and large Housing Associations who have been allocated funding (see Appendix 2 for further details), there is some flexibility in how Project Grant Applications are developed at Stage 1 Development Funding and 2. For example, Grant Applicants may choose to submit a Stage 1 Development Funding Grant Application that covers multiple Projects across public buildings and housing through a place-based approach , or combination of with wider Projects. This would enable them to draw down on 15% of their total allocation, subject to WMCA Hub approval.

Alternatively, for example, Grant Applicants may submit separate Stage 2 Delivery Funding Grant Applications, covering specific pots of funding within the Grant Application windows. Please note, however, timescales for approval of all allocated funding through multiple Grant Applications at Stage 1 Development Funding Stage 2 Delivery Funding may take longer to approve than approval through one Grant Application. Should Grant Applicants wish to submit Grant Applications on a phased basis this should be clearly identified within the initial Stage 1 Development Funding Grant Application.

Small Housing Associations

Housing Association with a registered stock of less than one thousand will be able to apply directly to WMCA Hub for a fair-share pot of funding (£2.6m). Early engagement on Project ideas will be crucial to funding the most impactful Projects through the Buildings' Retrofit Pilot (see Section 12 for how to get in touch).

For Grant to be approved, small Housing Associations must submit a completed Development Plan to the WMCA Hub. A Grant Application must also be made within the available funding limits allocated to this funding pot, otherwise a Project is unlikely to be considered. Finally, Project ideas should consider the full range of primary and secondary Outcomes the WMCA Hub will be looking to achieve through the Scheme (see Section 6.2).

Non-LA Public Sector Organisations

Eligible Public Sector Organisations (see Section 5.1) will be able to apply directly to WMCA Hub for a fair-share pot of funding (£3.5m). Early engagement on Project ideas will be crucial to funding the most impactful Projects for funding through the Buildings’ Retrofit Pilot (see Section 12 for how to get in touch).

It is encouraged that Public Sector Organisations engage with their respective Local Authorities on their approach to retrofitting eligible public sector buildings within the local area. A LA may choose to allocate some of its funding pot to non-LA organisations.

Non-LA Public Sector Organisations can also apply directly to WMCA through by submitting a Stage 1 Development Funding Grant Application. A Grant Application must also be made within the available funding limits allocated to this funding pot, otherwise a Project is unlikely to be considered. Finally, Project proposals should consider the full range of primary and secondary Outcomes the WMCA Hub will be looking to achieve through the Scheme (see Section 6.2.1)

6.2.1. Outcomes Framework

In making a Grant Application to the Devolved Buildings’ Retrofit Pilot, Grant Applicants must consider their fair share of Outcomes. For Grant Applicants with a funding allocation, a fair share of Outcomes has been calculated and communicated via email (please get in touch with the Buildings’ Retrofit Pilot team if you need this re-sent). For Grant Applicants without an individual funding allocation, please get in contact with the Buildings’ Retrofit Pilot team for the Project to be discussed and Outcomes allocation to be calculated.

Table 10: Government’s Outcomes Framework for the Devolved Buildings’ Retrofit Pilot with commentary

Outcome and Output	Target	Further detail
Number of social homes upgraded to EPC C	12,300	<ul style="list-style-type: none"> The target is based on DESNZ modelling of the expected measure mix and costs per home at the national level

Outcome and Output	Target	Further detail
		<ul style="list-style-type: none"> Up to 10% of social rented homes can be EPC C and above Up to 10% of homes can be flexed towards private low income/fuel poor households Up to 5% of homes can be treated with no tenure or starting EPC specified The three flexibilities above are cumulative
Number of low-income private homes upgraded to EPC C	1,700	<ul style="list-style-type: none"> The target is based on DESNZ modelling of the expected measure mix and costs per home at the national level Up to 10% of homes can be flexed towards social rented homes Up to 5% of homes can be treated with no tenure or starting EPC specified The two flexibilities above are cumulative
Accumulative lifetime bill savings from homes (£m over 2025 – 2069, 3-year target)	145.2	<ul style="list-style-type: none"> Based on a modelled average energy bill saving per home of £235.7/year Savings can be deemed by using pre- and post-works EPCs, but other methods of determining savings (e.g. measured savings) can be considered
Lifetime carbon reductions from homes (ktCO ₂)	369	<ul style="list-style-type: none"> Assumes 44-year lifetime Based on a modelled average annual carbon saving of 0.6 tCO₂ per home
Annual carbon emissions reductions from public buildings (ktCO ₂)	3.6	<ul style="list-style-type: none"> Assumes an average Project lifetime of 22 years, based on DESNZ modelling of Projects at the national level

Outcome targets for individual organisations are predominantly allocated on a fair share basis in the same way funding has been allocated. For example, an organisation with 10% of the funding for public sector buildings would be set a target of achieving 10% of the overall carbon emissions reductions target for public sector buildings.

Appendix 2 sets out the outcome allocations for each organisation and funding pot.

Targets are necessary for ensuring that the programme meets the minimum Outcomes set by the Government, which reflect DESNZ’s statutory obligations, and for demonstrating that the programme achieves value for money. However, WMCA Hub is also keen to ensure

that setting targets for individual organisations does not have a disproportionate influence on how Projects are formed and delivered.

WMCA Hub would like to work with organisations to understand ways in which Projects can meet and exceed targets, but also where flexibility regarding targets would enable better Outcomes overall and could be agreed on an individual basis. For example:

- a Project focusing on installing more extensive measures in a smaller number of homes may result in high carbon and bill savings and greater secondary benefits, but fewer homes reaching EPC C;
- a place-based approach may result in a higher proportion of private homes (or social homes) being included within a Project, which can be facilitated by the three Outcomes Framework flexibilities, and balancing Outcomes across the Scheme;

Grant Applicants are encouraged therefore to work with WMCA Hub when developing Projects to strike the right balance between helping to meet programme level Outcomes and considering real world practical limitations.

6.2.2. Additionalities and Social Value

Buildings' Retrofit Pilot Projects will be expected to achieve a range of secondary Outcomes, including social value, co-benefits and wider additionalities associated with Buildings' Retrofit works.

The WMCA Hub encourages Grant Applicants to consider what co-benefits are achievable within a Project, based upon the total Grant allocation to each Grant Applicant and to work with the WMCA Hub to develop a plan for their delivery.

WMCA Hub will require light touch monthly monitoring on these secondary Outcomes and a full summary on completion of the Project, when the Grant Recipient should confirm whether the agreed co-benefits have been achieved. The evaluation of these co-benefits will also form part of overall Scheme evaluation conducted by WMCA Hub and the Government.

Projected secondary Outcomes, additionalities and social value, will be based upon the total allocation and projected scheme costs for each individual Grant Applicant, and will not be stipulated as a condition of funding.

Examples of these secondary Outcomes can be found below; these secondary Outcomes will be agreed following evaluation and approval of Stage 1 Development Funding and Stage 2 Delivery Funding bids:

Table 11: example list of potential co-benefits that can be delivered through a Buildings' Retrofit Project.

Examples of potential Co-Benefits	Further explanation
Improved indoor air quality	Reduction in levels of CO ₂ , moisture, and other pollutants
Improved thermal comfort	Elimination of underheating
Conservation of heritage	Retention of original fabric, reinstatement of features
Understanding of heritage	Interpretation panels, talks and tours
Local Employment	Employment of people based within 50 miles
Local Materials	Materials originating or manufactured within 50 miles
Training and skills	See table below
External space	Creation or restoration of gardens or other public space
Waste reduction	Reuse or specification of reclaimed and recycled materials
Pollution reduction	Reduction in toxic chemicals in Buildings' Retrofit materials
Potable water efficiency	Water efficient taps and showers, rainwater harvesting for WCs
Sustainable Drainage	Permeable paving, holding ponds, rainwater harvesting
Other Social Benefits	Improved community cohesion, etc.

Skills and Education Social Value Targets
Training and education
School/College/University site visits - nr of students
School/College workshops - nr of students
Research Projects - nr
Work Experience 14-18 years - nr of people

Skills and Education Social Value Targets
Work Experience - 16+ years - nr of people
Apprentice - existing (safeguarded) - nr of people
Apprentices - Project Initiated - starts (created) - nr of people
Health and Safety Training - nr of people
Vocational Qualifications - nr
Construction Skills Certification Scheme (CSCS) skills card - nr
Short Courses - nr of people
Progression into employment (under six months) - nr of people
Progression into employment (over six months) - nr of people

6.3. Grant Funding Reallocation

Project Grant funding and Co-Funding expenditures will be meticulously monitored through monthly reports. Progress will be evaluated against the latest Financial Baseline and Forecast Report, and this evaluation will be reviewed each month in collaboration with the designated WMCA Hub SPOC.

In the event of a projected potential underspend, the situation will be assessed and reviewed with the Applicant. The aim is to determine how the programme might absorb the underspend, which could involve additional properties or installation measures.

If the original Grant Applicant is unable to allocate the funds within the existing programme, WMCA Hub will reallocate the funds to other Grant Applicants. Should any underspend require reallocation, it will be offered to other Grant Applicants, provided they fulfil the Grant Application approval process outlined in Section 6.1.2.

Any reallocated Grant funding will remain subject to the appropriate level of Co-Funding, achievement of Outcomes and approval by the Panel.

Funding will be reallocated under the following conditions:

Non-Confirmation by Large Housing Associations: Large Housing Associations (with over 1000 stock) must confirm their intention to apply for their allocated funding within the allotted Stage 1 Development Funding and 2 windows (as detailed in Section 6.1.1) via email response to WMCA Hub by 30 June 2025.

Non-Submission by Eligible Organisations: Eligible organisations with a funding allocation must submit a Stage 1 Development Funding or Stage 2 Delivery Funding Grant Application within the allotted windows (as detailed in Section 6.1.1).

Underspend During Project Delivery: If underspend is identified during Project delivery and cannot be reallocated within the programme.

Any underspend will be reallocated in a way that seeks to maximise the overall Outcomes of the Pilot.

Reallocation of Public Buildings Funding

For Local Authorities who choose not to apply for their allocated Grant funding for public buildings, the WMCA will allow for, on request, their allocation to be ringfenced for eligible non-LA public organisations within their Local Authority area. This will enable the benefit of allocated Grant funding to be retained within the local area, effectively increasing the available Grant for other Eligible Organisations to deliver. The deadlines for Stage 1 and 2 applications using this funding defaults to the relevant ones for non-LA public organisations (see section 6.1.1).

7. Monitoring and Reporting

7.1. Monitoring and Reporting

To ensure the Project is on track and meeting its goals, the Grant Recipient must follow these monitoring and reporting guidelines, as detailed in Section 9 of the GFA:

1. Project Monitoring:

The Grant Recipient will closely monitor the delivery and success of their Projects throughout the Grant Period to ensure that the aims and objectives of the Project are being met.

2. Monthly Reports:

Every month, the Grant Recipient must provide a Financial Baseline and Forecast Report to the WMCA Hub. This report includes financial forecasts, KPIs, Milestones, and other relevant information. It must be submitted by the tenth Working Day of each month. Delays may result in withheld or reduced Grant payments.

3. Report Content:

The monthly report should cover:

- Progress on the Project
- Updates on Outputs, Outcomes, KPIs, and Milestones
- Risks, issues, or concerns affecting progress
- Any suspected fraud or errors
- Detailed property information, including contact details, funding, measures delivered, assessments, and TrustMark certificates
- Reasons for occupants dropping out of the Scheme
- Amount of Grant funding received or requested
- Any other items to escalate to the WMCA Hub

4. Match Funding:

If the Grant Recipient has received Co-Funding and/or Third-Party Funding, details of this must be included in its latest Baseline and Forecast Financial Report.

5. Accuracy and Enquiry:

The Grant Recipient must ensure all reports and information provided are accurate and based on diligent enquiry. Data may be shared with other organisations for crime prevention.

6. Access and Information:

During the Grant Period and for six years after, the Grant Recipient must allow authorised persons reasonable access to employees, premises, and records for monitoring and evaluation. Any requested information, explanations, or documents must be provided to the WMCA Hub

7. Independent Assurance:

The WMCA Hub may request independent assurance that the Grant has been used properly. This may include a report from an independent auditor (which may be internal or external). Please see Section 8 for Auditing and Assurance information.

8. Final Report:

At the end of the Grant Period, the Grant Recipient must provide a final report confirming the successful completion of the Project.

9. Concerns and Issues:

If there are any concerns or issues with the Project, the Grant Recipient must notify the WMCA Hub. Both parties will work together to ensure the Project continues as required.

7.2. Milestones (Domestic and Public Buildings)

The Milestones will show what the Grant Recipient expects to achieve in each year of the Project in terms of the anticipated Outcomes in the baseline. These will be reviewed as part of the yearly reviews. The Grant Recipient will report monthly against the following Milestones in connection with the Grant.

REF	DOMESTIC MILESTONE TITLE	DEFINITION
MS DOM1	Project Team Established	Project Team, including Buildings Retrofit Coordinator, appointed and governance regime established and approved.
MS DOM2	Procurement Activity Completed	All necessary procurement processes, including the execution of contracts, for all core contractors to deliver the Scheme as set out in the Project approved Development Plan have been completed.

REF	DOMESTIC MILESTONE TITLE	DEFINITION
MS DOM3	Pre-construction tenant engagement completed	All pre-construction steps set out within the tenant engagement plan provided as part of the approved Development Plan should be completed.
MS DOM4	Whole House Buildings' Retrofit Assessment stage completed	All steps outlined under the PAS2035 Whole House Dwelling Assessment stage have been completed.
MS DOM5	Buildings' Retrofit Design and Co-ordination Pre Installation stage completed	All Pre Installation steps outlined under the PAS2035 Design and Coordination stage have been completed.
MS DOM6	Installation stage started	Installation work, as defined under the PAS2035 Installation stage, has commenced.
MS DOM7	Installation stage completed	All steps outlined under the PAS2035 Installation stage have been completed.
MS DOM8	Handover and Lodgment	Handover of property to resident /tenant/landlord and lodgment to Trustmark Data warehouse

REF	PUBLIC SECTOR MILESTONE TITLE	DEFINITION
MS PS1	Project Team Established	Project Team, including suitably qualified Buildings Retrofit Lead Professional, Assessor and Designer, appointed and governance regime established and approved.
MS PS2	Buildings' Retrofit Assessment stage completed	All steps outlined in Appendix 8 of the Scheme Guidance have been completed.

REF	PUBLIC SECTOR MILESTONE TITLE	DEFINITION
MS PS3	Pre-construction occupant/tenant/leaseholder engagement completed	All pre-construction steps set out within the occupant/tenant/leaseholder engagement plan provided as part of the approved Public Building Application Form should have been completed.
MS PS4	Buildings' Retrofit Design completed	All Buildings Retrofit Design has been completed.
MS PS5	Procurement activity completed	All necessary procurement processes, including the execution of contract, for all core contractors to deliver the Scheme as set out in the Project approved Public Building Application Form have been completed.
MS PS6	Installation stage started	Installation work commences.
MS PS7	Installation stage completed	All Installation stage completed.
MS PS8	Handover and Practical Completion	Handover of building to occupant/tenant/leaseholder and practical completion achieved including a full technical handover information pack to the resident.

7.3. KPIs (Domestic Buildings)

Grant Recipients will also be tracked against key performance indicators (KPIs) to support the achievement of the Milestones and monitor the progress of the Project. KPIs will be delivery focused. The Grant Recipient will report monthly against the following KPIs in connection with the Grant.

Domestic KPIs:

REF	DOMESTIC KPI TITLE	DEFINITION
KPI DOM1	Number of properties that have completed the PAS2035 Whole House Buildings' Retrofit Dwelling Assessment stage	The number of properties that have completed the PAS2035 Whole House Buildings' Retrofit Dwelling Assessment stage (Milestone MS DOM4) in month, and total cumulative all months. Performance targets for the month and cumulative will be taken from the Development Plan baseline.
KPI DOM2	Number of properties that have completed the Buildings' Retrofit Design and Coordination Pre Installation stage	The number of properties that have completed the Buildings' Retrofit design and coordination Pre Installation stage (Milestone MS DOM5) in month, and total cumulative all months. Performance targets for the month and cumulative will be taken from the Development Plan baseline.
KPI DOM3	Number of tenants/residents/landlords engaged and signed up to Works through the Privacy Notice	The number of tenants/residents/landlords who have been engaged as part of the engagement plan and who have signed the Privacy Notice to have Works completed on their property. Performance targets for the month and cumulative will be taken from the Development Plan baseline.
KPI DOM4	Number of properties completed	The number of properties that are deemed complete, i.e., completed in the installation stage (Milestone MS DOM7) in a month, and total cumulative in all months. Performance targets for the month and cumulative will be taken from the Development Plan baseline.
KPI DOM5	Handover and Trustmark Lodgment	Properties with completed handover and have been registered in the Trustmark Data Warehouse, or equivalent, (Milestone MS DOM8) in month, and total cumulative all months. Performance targets for the month and cumulative events will be taken from the Development Plan baseline.

REF	DOMESTIC KPI TITLE	DEFINITION
KPI DOM6	Number of social homes that have reached EPC C	The number of social properties that are deemed complete i.e., completed the handover stage and have been registered in the Trustmark Data Warehouse (MS DOM5), and are deemed to have reached EPC C, in month, and total cumulative all months. Performance targets for month and cumulative will be taken from the Development Plan baseline.
KPI DOM7	Number of private low-income / fuel poor homes that have reached EPC C	The number of private / fuel poor properties that are deemed complete i.e., completed the handover stage and have been registered in the Trustmark Data Warehouse (MS DOM5), and are deemed to have reached EPC C, in month, and total cumulative all months. Performance targets for month and cumulative will be taken from the Development Plan baseline. Performance targets for month and cumulative will be taken from the Development Plan baseline.

8. Auditing and Assurance

To ensure transparency and proper use of the Grant, the Grant Recipient must adhere to the following auditing and assurance requirements, and as set out in the GFA Section 10:

1. Annual Audit and Assurance:

In accordance with the requirements of the GFA, the Grant Recipient must provide independent assurance that the Grant has been used for the Funded Activities. This includes having annual accounts audited by an independent, qualified auditor (which may be internal or external), with the Grant clearly segregated from other funds. The auditor's reasonable assurance report must be shared with WMCA Hub within five Working Days of completion.

2. Additional Audits:

WMCA Hub reserves the right to conduct additional audits or request further information at any time during and up to three years after the end of the Project. The Grant Recipient must grant access to Project sites and relevant records, ensuring sub-contractors also comply with these requirements.

3. Audit Trail:

The Grant Recipient must maintain a complete audit trail and provide any requested information, explanations, and documents to WMCA Hub within ten Working Days of a request.

4. Independent Auditor:

An independent auditor (which may be internal or external) must verify the final statement of expenditure submitted to WMCA Hub. The Grant funding must be identified separately in the audited accounts and annual report. The independent auditor can be the organisation's internal audit team or an extension of an organisation's existing internal audit arrangements.

5. Record Retention:

All invoices, receipts, accounting records, and other documentation related to the Eligible Expenditure must be retained for six years from the end of the Grant Period.

6. Forecasts:

Revised forecasts of expenditure must be promptly provided as part of its latest Financial Baseline and Forecast Report.

7. Compliance with Filing Requirements:

Companies must file their annual return and accounts by the specified dates at Companies House. Registered charities must file their annual return by the date specified by the Charity Commissioner. Copies of these filings must be provided to the WMCA within ten Working Days.

9. Regional Level Support

9.1. Introduction

Regional level support for the Scheme consists of the following resources:

- WMCA Hub;
- WMCA Managed Support Services; and
- Other support services.

Brief details of each are set out in the Sections below.

9.2. WMCA Hub: Technical Assistance and Project Support

The WMCA Hub who will ultimately be responsible for the managing and coordination of all reporting, Grant Application support (as required), monitoring programme delivery in conjunction with Grant allocation, and coordinating reconciliation and audit compliance with Grant Recipients

The WMCA Hub will support Projects through advice, monitoring and reporting and support with Grant -Applications. The Hub will provide support to Grant Applicants from initial Project ideation to Project closedown.

WMCA will provide a SPOC to each organisation in advance of Stage 1 Development Funding submission to help answer any questions and manage support to the organisation throughout the Pilot period.

Support for Project development includes technical and non-technical advice and scrutiny for Project and pipeline development at either Stage 1 Development Funding Stage 2 Delivery Funding. It is advised that Grant Applicants engage with the WMCA Hub early to ensure Project critical friend support and Grant Application writing advice can be provided early in the Project's development (see Section 6.2 for details on developing Grant Applications).

Support for delivery includes ongoing assignment of the SPOC for each Grant Recipient. Advice and support will be provided through this relationship through monthly meetings to assist Grant Recipients with managing delivery. This will also be managed through the monthly monitoring and reporting process.

The WMCA Hub SPOC will arrange with each individual Grant Recipient monthly meetings which can be held at the offices of the Grant Recipient, the purpose will be to evaluate the Grant Recipient's progress against that contained within the monthly report including forecasting against baseline, progress against Milestones and KPIs.

WMCA can provide further assistance regarding accessing additional funding and finance through its Local Net Zero Accelerator team, which will work alongside the WMCA Hub.

9.3. WMCA Managed Support Services

Based upon the success of previous domestic Buildings' Retrofit programmes, namely both the Social Housing Decarbonisation Fund (SHDF) and the Home Upgrade Grant (HUG), WMCA have increased the Managed Support Services available to Grant Applicants to assist with both pre and post aspects of programme delivery. This is initially aimed at those RPs and LAs who lack the resource and knowledge to enable delivery of successful compliant Projects.

The Managed Support Services are available to all Eligible Organisations undertaking domestic Buildings' Retrofit works, with support available covering many requirements to achieve a fully compliant programme. This will allow all Grant Applicants to utilise the professional support available to ensure they achieve a structured approach to their individual programme.

Various support services available to Grant Applicants includes:

- PAS 2035 Accredited Buildings' Retrofit Assessors Accredited Buildings' Retrofit Coordinators
- Full PAS 2035 Design compliancy
- Full range of technical enabling services and guidance on compliance
- Project Management Pre and Post contract
- Planning advice and guidance
- Procurement DPS support including forms of contract appointment
- Quality Assurance checks for compliancy and handover process (Project and Clerk of Works roles)
- Customer Journey Support advice and guidance
- Independent VAT Advice and guidance

Any Grant Applicant requiring Managed Services Support will be required to enter into a Services Agreement based upon a schedule of agreed services and competitive rates.

For further information and access to the WMCA Managed Support Services, please email our inbox: devolved.retrofit@wmca.org.uk.

9.4. Other Support Services

The Buildings' Retrofit Pilot and regional stakeholders will continue to benefit from certain nationally available support services that operate for their respective national schemes. These services are listed out below and include:

- **Net Zero Go**¹³ is available to all UK LA teams working on net zero Projects
- **Retrofit Information Support Expertise (RISE)** (previously known as the Home Upgrade Hub for private home Buildings' Retrofit, or the Social Housing Retrofit Accelerator for social housing)¹⁴. DESNZ will be retaining RISE to provide support for all regional stakeholder interested in delivering social or private housing Buildings' Retrofit. This includes access to all publicly available capability and capacity upskilling offers, such as webinars, master classes and resource pools.
- **Salix Finance**¹⁴. The range of tools and services Salix Finance provides for Grant Applicants applying to the national Public Sector Decarbonisation Scheme will be available to Grant Applicants of this Scheme. This includes access to all publicly available capability and capacity upskilling offers, such as webinars, master classes and resource pools.

¹³ [Net Zero Go](#)

¹⁴ Salix Finance (2025) [Tools and resources | Salix Finance](#)

10. Finance and Interaction with Other Schemes

A key aim of the Buildings' Retrofit Pilot is to use Grant funding to leverage additional investment, both public and private, otherwise referred to as Third Party Funding. Grant Applicants are therefore strongly encouraged to consider the additional funding available for Projects that could increase their scope, quality and impact. Grant Applicants should also consider how Buildings' Retrofit work can be delivered alongside other planned complementary work to improve efficiency and deliver better Outcomes for residents.

As the Scheme consists of devolved funding through three discreet national Grant funding schemes, Eligible Organisations for the Pilot forfeit eligibility for the national schemes by default. Please see Section 4.1 and 5.1 for details on eligibility.

Beyond these three national schemes, Grant funding can be applied for and used to supplement the delivery of a Project within the Scheme. This funding can class as Co-Funding towards any Pilot Grant applied for or received. However, any additional funding should not be used to fund the same measure twice. Double counting of Eligible Expenditure will be closely monitored, and it is the Grant Recipient's responsibility to ensure Grant funding from multiple sources are managed appropriately within a Project.

Table 122 below provides a non-exhaustive overview of possible additional funding or finance sources that Grant Applicants could consider leveraging:

Table 122: list of potential additional funding sources for Buildings Retrofit Pilot Projects

Source	Detail
Central Government/National funding	
Energy Company Obligation	<p>The Energy Company Obligation (ECO) is a government energy efficiency Scheme in Great Britain designed to tackle fuel poverty and help reduce carbon emissions.</p> <p>The ECO Scheme works by placing a Home Heating Cost Reduction Obligation (HHCRO) on medium and large energy suppliers. Under HHCRO, obligated suppliers must promote measures that improve the ability of low-income, fuel-poor and vulnerable households to heat their homes. This includes actions that result in reduced energy usage, such as installing insulation or upgrading a heating system. The overall target for these measures is divided between suppliers based on their relative share of the domestic gas and electricity market.</p> <p>https://www.ofgem.gov.uk/environmental-and-social-Schemes/energy-company-obligation-eco</p>

Source	Detail
<p>Great British Insulation Scheme</p>	<p>The Great British Insulation Scheme is a Government energy efficiency Scheme (formerly known as ECO+) administered by Ofgem. It is designed to deliver improvements to the least energy-efficient homes in Great Britain to tackle fuel poverty and help reduce energy bills.</p> <p>As well as supporting low-income and vulnerable households, it is also available to those living in homes with an Energy Performance Certificate rating of D-G, and within Council Tax bands A-D in England and A-E in Scotland and Wales.</p> <p>The Scheme works by placing an obligation on medium and large energy companies to deliver measures that result in reduced energy usage. The Scheme began in April 2023 and is scheduled to end in April 2026.</p> <p>https://www.ofgem.gov.uk/environmental-and-social-Schemes/great-british-insulation-Scheme</p>
<p>Boiler Upgrade Scheme</p>	<p>The Boiler Upgrade Scheme provides grants to cover part of the cost of replacing fossil fuel heating systems with a heat pump or biomass boiler (for rural off-gas properties only).</p> <p>https://www.gov.uk/apply-Boiler-Upgrade-Scheme</p>
<p>Warm Homes Skills Programme</p>	<p>The £8 million Warm Homes Skills Programme, running until July 2026, will provide subsidised training opportunities of up to 9,000 for installers and Buildings’ Retrofit professionals, including installing insulation and solar panels in homes and non-domestic properties.</p> <p>https://www.gov.uk/government/publications/warm-homes-skills-programme</p>
<p>Heat Training Grant</p>	<p>The Heat Training Grant provides heating engineers with a discount of up to £500 towards the cost of heat pump training, plus support and advice when installing a heat pump for the first time.</p> <p>https://www.gov.uk/government/publications/heat-training-grant-for-heat-pumps</p>
<p>Net Zero Accelerator Service / Great British Energy Schools Funding</p>	<p>The Department for Education’s Net Zero Accelerator programme provides funding and support to promote energy efficiency and renewable energy generation on school campuses. Further information on how schools in</p>

Source	Detail
	<p>the West Midlands can access this support will be made available in the common months.</p> <p>https://www.gov.uk/government/news/great-british-energy-to-cut-bills-for-hospitals-and-schools</p>
Heat Network Funding	<p>Green Heat Network Fund (GHNF) Heat Network Efficiency Scheme (HNES)</p>
Low Carbon Skills Fund	<p>The Public Sector Low Carbon Skills Fund provides grants for public sector bodies to access skills and expertise to unlock heat decarbonisation on their estate, including development of decarbonisation plans. No funding opportunities are live now, but future funding rounds may be announced.</p> <p>https://www.gov.uk/government/collections/public-sector-low-carbon-skills-fund</p>
Complementary public sector funding	
Repair and maintenance funding	<p>Using existing maintenance budgets that may include or complement energy improvement measures can be a cost-effective means of leveraging additional funding, which can also be classed as Co-Funding.</p>
Disabled Facilities Grant	<p>Combining Local Authority Disabled Facilities Grant with Buildings' Retrofit grant funding can enable more significant works to take place on individual homes, helping to improve housing quality and enable people to live in their homes for longer.</p>
Swimming Pool Support Fund	<p>https://www.sportengland.org/guidance-and-support/facilities-and-planning/swimming-pool-support-fund</p>
Innovate UK funding for net zero initiatives	<p>https://iuk-business-connect.org.uk/sustainability/ https://iuk-business-connect.org.uk/programme/? sf_s=net%20zero</p>
Public and private finance	
Carbon credits	<p>Buildings' Retrofit Projects can unlock additional funding in the form of carbon credits, which reward carbon savings (in tonnes) generated by Projects with an annual payment</p>

Source	Detail
	<p>based on the cost per tonne of carbon saved (typically £85/tonne for a period of 20 years).</p> <p>HACT is one provider of carbon credits for housing Buildings' Retrofit Projects: https://hact.org.uk/retrofit-credits/</p>
Private Buildings' Retrofit finance	<p>There are several emerging business models that can offer funding solutions for retrofits - in particular finance for solar PV and battery storage for housing - using revenue from energy savings, generation and flexibility services to pay back capital costs over time. Over the course of the Pilot, WMCA will support partners to explore and implement these models to increase investment and Buildings' Retrofit activity in the region's homes.</p>
National Wealth Fund	<p>National Wealth Funding has recently announced a guarantee of up to £400m to cover a series of loans provided by NatWest Group to registered providers for the Buildings' Retrofit of social housing stock in the UK.</p> <p>The lending aims to help registered providers of social housing reduce energy consumption and accelerate the decarbonisation of their housing stock. In line with NWF's previous social housing Buildings' Retrofit investments, the loans will be used on eligible measures for Buildings' Retrofit, including the installation of energy efficient heating and lighting, insulation, renewable energy generation, ventilation and heating controls, as well as work on resilience measures and biodiversity.</p> <p>https://www.nationalwealthfund.org.uk/news/national-wealth-fund-and-natwest-group-deliver-ps500m-funding-social-housing-retrofit</p>
Creative Foundations Fund	<p>The Creative Foundations Fund is an open-access capital fund that supports creative and cultural organisations in England in revitalising, restoring, retrofitting, or renewing cultural assets, including urgent work to address issues which prevent organisations from effectively delivering work for the public.</p> <p>https://www.artscouncil.org.uk/our-open-funds/creative-foundations-fund-guidance-applicants#t-in-page-nav-1</p>

Local Net Zero Accelerator

The Local Net Zero Accelerator is funded by DESNZ and is a two-year WMCA programme delivered in partnership with the region's Local Authorities.

Launched in 2024, and due to be completed in 2026, it seeks to support net zero Projects across the region to become more ready for investment and identify suitable finance mechanisms to enable greater investment into the region.

11. Data Management and DataLeNZ Platform

11.1. Data Management Approach

The Pilot will aim to put in place effective systems for managing data and reporting that will provide more efficient ways to access and report on data, keep track of project progress, enhance data security and protection and enable analysis to support impact reporting.

11.2. DataLeNZ Platform

WMCA is developing a data management platform called **DataLeNZ**, with the capability of collecting and storing a wide range of project data. The platform will be developed in two stages. The first stage will be developed in-house using existing database architecture and will provide a limited range of capabilities. The second stage will provide a greater breadth of functionality, which will be subject to further scoping and a formal procurement exercise.

The internal build stage of the platform will be developed in collaboration with the Transport for West Midlands Team and will deliver a mechanism to support the ingest of a range of datasets into the platform based on existing software and architecture. The platform will facilitate the monthly reporting and monitoring process for the Scheme, including error checking, data validation and automatic reporting. Grant Recipients will submit reports to WMCA, which will be managed by DataLeNZ.

For the interim solution, monthly reports will be submitted on excel files based on a structure used in previous similar schemes to the Scheme (**HUG** and **SHDF**). These are to be uploaded by the Grant Recipient onto the portal link provided by the WMCA by the tenth of each month (see Section 7). DataLeNZ will check the data as it is ingested into the database and will flag any erroneous looking data based on set data quality standards. Once in the database, the data will be consolidated with other data sets to provide a regional view of the programme. Instructions will be provided in due course.

The second DataLeNZ build stage will look to enhance capabilities and functionality. The scope of potential features could include PAS2035 Buildings' Retrofit works workflow management, recording of building information (Building Passports or Logbooks), improved user access / UK GDPR management, greater integration of externally available datasets and enhanced functionality for impact reporting. WMCA will be running a procurement exercise on this during 2025 and will continue engagement with West Midlands stakeholders.

An overview of what the DataLeNZ platform could offer is shown in the diagram below.

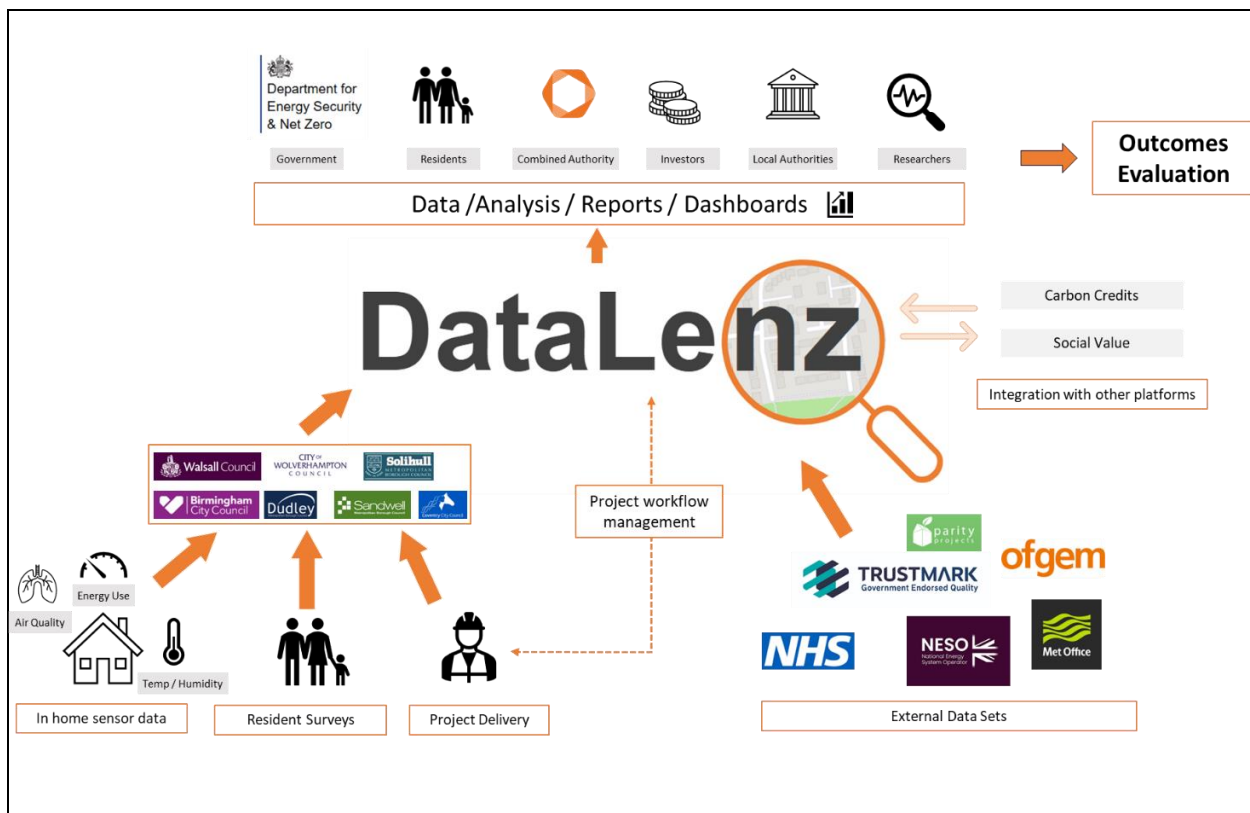


Figure 2: depiction of the WMCA’s DataLenZ platform, which will be used for data processing and management through the Buildings’ Retrofit Pilot.

11.3. Data Sharing Agreement

The DSA between WMCA and the Grant Recipient forms part of the GFA as Schedule 10. The Grant Recipient must have a strategy for collecting, checking, and summarising financial and delivery data received from the Project(s) in a timely and effective manner to report this to WMCA within the required timeframe (see Section 0 for more detail on Monitoring and Reporting).

In accordance with its responsibilities as independent Controller, WMCA has identified the lawful basis for WMCA and its third parties to process Buildings’ Retrofit Pilot data (**Retrofit Data**) for evaluation, research and statistical purposes as public task (UK GDPR Article 6(1)(e)), where processing is necessary for the Secretary of State’s responsibility to report and evaluate the effectiveness of its policies. WMCA’s evaluation partner will process Retrofit Data shared by WMCA to invite Project participants to take part in evaluation research. By taking part in research, data subjects give their consent to WMCA’s evaluation partner to process their responses as Retrofit Data research data (UK GDPR Article 6(1)(a)).

The use of anonymised or pseudonymised data will be considered as the primary form of data sharing with parties outside of WMCA, including with DESNZ, as is stipulated in the DSA. Only where the public task legal purpose cannot be achieved using anonymised or pseudonymised data will personal data be shared. Designated teams within WMCA or DESNZ may use Retrofit Data to generate research and official statistics concerning the Scheme, national housing stock, and other WMCA and DESNZ Schemes. Results will be reported in an anonymised, aggregated format. Further information on data required to deliver research, statistics and evaluation will be outlined in the DSA and GFA.

11.4. Central Database of Private Landlords

A central database will be maintained (with all data permissions given) to monitor the number of fully funded upgrades a landlord has received under the Scheme. This will ensure that landlords make the right level of Co-Funding contribution under the Pilot. Checks will be carried out by the WMCA based on the owner/s of the home, as set out in the title deeds. Local Authorities must verify that the ownership of the home set out in title deeds aligns to the details provided by the landlord/s before sending the details to WMCA for inclusion in the database.

12. Further Information

For Local Authorities, Housing Associations and Public Sector Organisations, to apply, access WMCA Hub support, or to get in touch to discuss a Project or Grant Application, please email our inbox: devolved.retrofit@wmca.org.uk.

For homeowners or private landlords, please express your interest in receiving a Grant through our website¹⁵. Please also consider applying directly through your LA, or through the national eligibility checker for this scheme¹⁶.

For further information and updates, please read through our Buildings' Retrofit Pilot website¹⁷. This includes a detailed FAQs document, Pilot event recordings, summary slides and a library of associated Transaction Documents.

To take part in regional events, please sign up to the West Midlands Retrofit Network¹⁸ or the Energy Capital collaboration days¹⁹

¹⁵ WMCA (2025) <https://www.wmca.org.uk/what-we-do/environment-energy/energy-capital/the-building-retrofit-pilot/>

¹⁶ GOV.UK (2025) <https://www.gov.uk/apply-warm-homes-local-grant>

¹⁷ WMCA (2025) <https://www.wmca.org.uk/what-we-do/environment-energy/energy-capital/the-building-retrofit-pilot/>

¹⁸ Ibid

¹⁹ WMCA (2025) <https://www.wmca.org.uk/what-we-do/environment-energy/energy-capital/partnerships/>

Appendices:

Appendix 1 – Glossary

Buildings' Retrofit: the retrofitting of homes and public sector buildings.

Buildings' Retrofit Pilot or Pilot: the Government's programme pilot for Buildings' Retrofit with funding from the following funding pots: WHSHF, WHLG and PSDS.

Co-Funding: the amount of contributory funding that the Grant Recipient must provide towards the Funded Activities in addition to the Grant related to these Funded Activities, and as more particularly referenced in the Co-Funding Minimum Percentage Contributions Table.

Co-Funding Minimum Percentage Contributions Table: the table set out in Paragraph 4 of Schedule 1 of the GFA.

Contracting Authority means any contracting authority (other than the WMCA) as defined in the Procurement Regulations.

Coordinator: a Buildings' Retrofit coordinator.

Customer Journey Support: the customer journey support for Buildings' Retrofit.

DataLeNZ: WMCA's data management platform for Buildings' Retrofit.

Development Plan: each applicable development plan (using the pro-forma in Appendix 1 of Schedule 3), which has been approved by the WMCA for either Stage 1 Development Funding or Stage 2 Delivery Funding, as the case may be.

DESNZ: the Government's Department for Energy Security and Net Zero

Direct Emissions: also known as Scope 1 emissions, are greenhouse gas emissions that originate directly from sources owned or controlled by a company or organisation.

ECO: the Government's Energy Company Obligation is a Government energy efficiency scheme in the UK designed to tackle fuel poverty and help reduce carbon emissions.

Eligible Buildings: as described in various Sections of this Scheme Guidance.

Eligible Expenditure: the expenditure incurred by the Grant Recipient in respect of any Pre-Works Activities and during the Grant Period in respect of the Works for the purposes of delivering the Funded Activities and which complies in all respects with the eligibility rules set out in Clause 5 of the GFA.

Eligible Organisations: the organisations eligible for funding under the Scheme as more particularly described and defined in Section 4.1 for homes and Section 5.1 for public sector buildings.

EPC: an Energy Performance Certificate, which details a domestic buildings energy use, as well as its carbon emissions.

Financial Baseline and Forecast Report: the monthly report submitted, as part of monitoring and reporting under Clause 9 of the GFA and in line with the Grant Payments Process in Schedule 4 of the GFA, which outlines the Grant Recipient's expected baseline and forecast spend profile for the duration of the Grant Period.

Financial Year: the financial period running from 1 April to 31 March in the following year.

Funder: means WMCA.

Funded Activities: for each Grant Applicant / Grant Recipient, (1) the funded activities described in Schedule 1 of its Grant Framework Agreement, and (2) each further specific group of funded activities for Works as set out in a Grant Application which, if approved by the Funder for funding with the Grant, will form part of the relevant Grant Offer Letter for that particular Grant.

Funding Allocation: the nominal Grant funding allocated on a fair-share basis to eligible Local Authorities and Housing Associations, which access is subject to approval of a Stage 1 Development Funding Stage 2 Delivery Funding Grant Application.

GHNF: the Green Heat Network Fund.

Government: the Government of the United Kingdom (including the Northern Ireland Assembly and Executive Committee, the Scottish Executive and the National Assembly for Wales), including Government ministers and Government departments and particular bodies, persons, commissions or agencies from time to time carrying out functions on its behalf.

Grant: the sum or sums to be paid to the Grant Recipient in accordance with its respective GFA and will be subject to review.

Grant Applicant: each eligible applicant for Grant funding under the Scheme.

Grant Application: means each Grant application by the Grant Recipient to the WMCA.

GCF: each Grant claim payment request form submitted by the Grant Recipient to the Funder for payment of the Grant and in such form and containing the information specified by the Funder from time to time, using the pro-forma sent by the Funder direct to the Grant Recipient as referenced in Appendix 1 to Schedule 4 of the GFA.

GOL: each Grant offer letter issued by the WMCA to the Grant Recipient confirming availability of a new tranche of Grant, following approval by the WMCA of either Stage 1 Development Funding or Stage 2 Delivery Funding and for drawdown by means of a Grant Claim Form, and each of which is an integral part of GFA.

Grant Funding Agreement or GFA: each Grant funding agreement between WMCA as funder and each approved Grant Applicant as Grant Recipient.

Grant Payments Process: the process for Grant payments as set out in Schedule 4 of the GFA.

Grant Period: the period for which the Grant is awarded starting on the applicable Commencement Date (as defined in each GFA) and ending on 31 March 2028.

Grant Recipient: each approved Grant Applicant as Grant recipient under a GFA.

HNES: the Heat Network Efficiency Scheme.

HUG: the Government's scheme for home upgrade grants.

Indirect Emissions: also known as Scope 2 Emissions and Scope 3 Emissions, are those caused by an organisation's activities but occur at sources owned or controlled by another entity.

Integrated Settlement: the integrated settlement of funding from the Government to the WMCA under its devolution framework relating to mayoral combined authorities and other LAs in the UK and, specifically in relation to this Agreement, for its three (3) Financial Years 2025-26, 2026-27 and 2027-28.

Integrated Settlement Funding Conditions: the terms and conditions in any funding letter or agreement made between the Government and the WMCA in relation to its Integrated Settlement for the relevant Financial Year, as more particularly referenced in Schedule 8 of each GFA and forming an integral part of the GFA, and expressly including Outcomes Framework, as may be amended, updated, superseded or replaced from time to time.

LA: a Local Authority.

LAEP: local area energy planning.

MHCLG: the Government's Ministry of Housing, Communities and Local Government.

KPIs: discreet Key Performance Indicators that Grant Recipients will be monitored and must report against.

Managed Support Services: WMCA's managed support services for Buildings' Retrofit.

MCS: the Microgeneration Certification Scheme.

MEES: Minimum Energy Efficiency Standards.

MFA: in the context of subsidy control, a subsidy in the category known as minimum financial assistance.

Milestones: has the meaning set out in Paragraph 5.3 of Schedule 1 of the GFA.

Outcomes: has the meaning set out in Paragraph 5.2 of Schedule 1 of the GFA.

Outcomes Framework: the outcomes framework agreed between the Government and the WMCA and forming part of the Integrated Settlement Funding Conditions, as may be amended, updated, superseded or replaced from time to time.

Outputs: has the meaning set out in Paragraph 5.1 of Schedule 1 of the GFA.

Panel: WMCA's Buildings' Retrofit Pilot Programme Panel, which will evaluate and approve Projects at Stage 1 Development Funding and Stage 2 Delivery Funding.

PFI: the private finance initiative.

Pilot or Buildings' Retrofit Pilot: the Government's programme pilot for retrofitting homes and public sector buildings with funding from the following funding pots: WSHF, WHLG and PSDS.

Pre-Works Activities:

- a) Buildings' Retrofit assessments, feasibility studies and eligible site investigations;
- b) Buildings' Retrofit coordination;
- c) design support in putting together your Grant Application for Stage 1 Development Funding or Stage 2 Delivery Funding;
- d) new pre-installation assessments and EPC assessments;
- e) household and building recruitment;
- f) preparatory building works;
- g) project management, reporting and governance hiring activities; and
- h) any other compliant activities as notified to the WMCA in writing.

PRS: the private rented sector.

Project: in respect of each Grant Applicant / Grant Recipient, each specific project of Works described in a Grant Application which, if approved for funding by a Grant from the Funder, will become the Funded Activities as defined under each GFA and each related GOL and **Projects** means all of them together.

Project Change Request: any project change request submitted by the Grant Recipient to the Funder under Clause 3 of the GFA, a pro-forma of which is included as Appendix 3 to Schedule 3 to the GFA.

PSDS: the Government funding pot known as the Public Sector Decarbonisation Scheme.

RdSAP: the reduced data SAP to assess the energy performance of existing dwellings, which is an alternative methodology to full SAP currently used by the Government to estimate the energy performance of homes, as more particularly referred to in Clause 9.3(e)(v) of the GFA.

RES: WMCA's regional energy strategy.

RISE: the hub known as the Retrofit Information Support Expertise, previously known as the Home Upgrade Hub for private home retrofit.

SAP: the Standard Assessment Procedure to assess the energy rating of dwellings, which is the methodology currently used by the Government to estimate the energy performance of homes, as more particularly referred to in Clause 9.3(e)(v) of the GFA.

Scheme: the WMCA's scheme in relation to the Buildings' Retrofit Pilot, which will run from 1 April 2025 to 31 March 2028, and which comprises two separate tranches of Grant funding, Stage 1 Development Funding and Stage 2 Delivery Funding, covering funding for Buildings' Retrofit, as may be amended, updated, superseded or replaced from time to time.

Scheme Guidance: means this guidance document for the Scheme, as issued by the WMCA from time to time, and which contains the form of Grant Application, and with which guidance the Grant Recipient must comply, as may be amended, updated, superseded or replaced from time to time.

SHDF: the Government's Social Housing Decarbonisation Fund.

Social Housing Retrofit Accelerator: the accelerator for social housing Buildings' Retrofit.

Stage 1 Development Funding: means the first stage of available Pilot funding, which is predominantly revenue funding, with maybe some capital expenditure, and as will be consistently defined in each Grant Offer Letter.

Stage 2 Delivery Funding: means the second stage of available Pilot funding, which is predominantly capital funding, with maybe some revenue expenditure, and as will be consistently defined in each Grant Offer Letter.

TAF: the region's technical assistance facility for Buildings' Retrofit.

Third Party Funding: funding provided by a third party to the Grant Recipient for the same purpose for which a Grant has been/is being made which has been notified to, and approved by, the Funder.

Transaction Documents: for each Grant Recipient, the Grant Framework Agreement, each Grant Application, Grant Claim Form and Grant Offer Letter and each other document designated as such by the Funder and such Grant Recipient.

UK GDPR: has the meaning given to it in section 3(10) (as supplemented by section 205(4)) of the Data Protection Act 2018.

VAT: value added tax chargeable in the UK.

WHLG: the Government funding pot known as the Warm Homes: Local Grant.

WHSHF: the Government funding pot known as the Warm Homes: Social Housing Fund.

Working Day: a day, other than a Saturday, Sunday or public holiday in England, when banks in London are open for business.

Works: means the Buildings' Retrofit works measures to be undertaken for and on behalf of the Grant Recipient through its delivery suppliers as further described in the Grant Application and which must be in accordance and compliance with the Scheme Guidance and applicable industry standards (including, without limitation, PAS 2035 and PAS 2030 compliance).

Appendix 2 – Individual Organisational Funding Allocations and Outcomes

	PSDS				WH: SHF				WH: LG				Total			
	25-26	26-27	27-28	Total	25-26	26-27	27-28	Total	25-26	26-27	27-28	Total	25-26	26-27	27-28	Total
Scheme wide allocation	9.2%	45.4%	45.4%	100.0%	28.9%	35.5%	35.5%	100.0%	17.6%	41.2%	41.2%	100.0%				0.0%
Organisation																
Birmingham City Council	£ 1,012,298	£ 4,985,295	£ 4,985,295	£ 10,982,889	£ 7,164,601	£ 8,792,920	£ 8,792,920	£ 24,750,441	£ 1,816,639	£ 4,252,586	£ 4,252,586	£ 10,321,811	£ 9,993,538	£ 18,030,802	£ 18,030,802	£ 46,055,141
Coventry City Council	£ 450,025	£ 2,216,252	£ 2,216,252	£ 4,882,529	£ -	£ -	£ -	£ -	£ 640,127	£ 1,498,479	£ 1,498,479	£ 3,637,086	£ 1,090,152	£ 3,714,732	£ 3,714,732	£ 8,519,615
Dudley MBC	£ 322,112	£ 1,586,317	£ 1,586,317	£ 3,494,745	£ 814,753	£ 999,924	£ 999,924	£ 2,814,601	£ 608,450	£ 1,424,327	£ 1,424,327	£ 3,457,103	£ 1,745,315	£ 4,010,567	£ 4,010,567	£ 9,766,450
Sandwell MBC	£ 299,591	£ 1,475,403	£ 1,475,403	£ 3,250,396	£ 3,291,712	£ 4,039,828	£ 4,039,828	£ 11,371,368	£ 526,073	£ 1,231,488	£ 1,231,488	£ 2,989,050	£ 4,117,375	£ 6,746,719	£ 6,746,719	£ 17,610,814
Solihull MBC	£ 430,218	£ 2,118,707	£ 2,118,707	£ 4,667,631	£ 544,443	£ 668,180	£ 668,180	£ 1,880,802	£ 427,973	£ 1,001,846	£ 1,001,846	£ 2,431,665	£ 1,402,633	£ 3,788,732	£ 3,788,732	£ 8,980,098
Walsall MBC	£ 272,206	£ 1,340,541	£ 1,340,541	£ 2,953,288	£ -	£ -	£ -	£ -	£ 475,867	£ 1,113,961	£ 1,113,961	£ 2,703,788	£ 748,073	£ 2,454,502	£ 2,454,502	£ 5,657,076
City of Wolverhampton Council	£ 135,851	£ 669,030	£ 669,030	£ 1,473,910	£ 2,761,708	£ 3,389,370	£ 3,389,370	£ 9,540,448	£ 446,328	£ 1,044,813	£ 1,044,813	£ 2,535,953	£ 3,343,887	£ 5,103,212	£ 5,103,212	£ 13,550,311
LA Subtotal	£ 2,922,300	£ 14,391,544	£ 14,391,544	£ 31,705,388	£ 14,577,217	£ 17,890,221	£ 17,890,221	£ 50,357,660	£ 4,941,456	£ 11,567,500	£ 11,567,500	£ 28,076,456	£ 22,440,974	£ 43,849,265	£ 43,849,265	£ 110,139,504
Anchor Hanover Group				£ -	£ 169,015	£ 207,428	£ 207,428	£ 583,871				£ -	£ 169,015	£ 207,428	£ 207,428	£ 583,871
Black Country Housing Group Limited				£ -	£ 208,920	£ 256,402	£ 256,402	£ 721,724				£ -	£ 208,920	£ 256,402	£ 256,402	£ 721,724
Bourmville Village Trust				£ -	£ 261,756	£ 321,246	£ 321,246	£ 904,249				£ -	£ 261,756	£ 321,246	£ 321,246	£ 904,249
Bromford Housing Association Limited				£ -	£ 626,154	£ 768,462	£ 768,462	£ 2,163,079				£ -	£ 626,154	£ 768,462	£ 768,462	£ 2,163,079
Citizen Housing Group Limited				£ -	£ 2,401,471	£ 2,947,259	£ 2,947,259	£ 8,295,989				£ -	£ 2,401,471	£ 2,947,259	£ 2,947,259	£ 8,295,989
Clarion Housing Association Limited				£ -	£ 330,454	£ 405,557	£ 405,557	£ 1,141,567				£ -	£ 330,454	£ 405,557	£ 405,557	£ 1,141,567
GreenSquareAccord Limited				£ -	£ 1,128,351	£ 1,384,794	£ 1,384,794	£ 3,897,939				£ -	£ 1,128,351	£ 1,384,794	£ 1,384,794	£ 3,897,939
Housing 21				£ -	£ 108,400	£ 133,036	£ 133,036	£ 374,473				£ -	£ 108,400	£ 133,036	£ 133,036	£ 374,473
Longhurst Group Limited				£ -	£ 266,808	£ 327,446	£ 327,446	£ 921,699				£ -	£ 266,808	£ 327,446	£ 327,446	£ 921,699
Midland Heart Limited				£ -	£ 2,113,246	£ 2,593,529	£ 2,593,529	£ 7,300,303				£ -	£ 2,113,246	£ 2,593,529	£ 2,593,529	£ 7,300,303
Nehemiah United Churches Housing Association Limited				£ -	£ 123,554	£ 151,634	£ 151,634	£ 426,822				£ -	£ 123,554	£ 151,634	£ 151,634	£ 426,822
Orbit Housing Association Limited				£ -	£ 169,520	£ 208,048	£ 208,048	£ 585,616				£ -	£ 169,520	£ 208,048	£ 208,048	£ 585,616
Platform Housing Limited				£ -	£ 379,552	£ 465,814	£ 465,814	£ 1,311,179				£ -	£ 379,552	£ 465,814	£ 465,814	£ 1,311,179
Sanctuary Housing Association				£ -	£ 329,443	£ 404,317	£ 404,317	£ 1,138,077				£ -	£ 329,443	£ 404,317	£ 404,317	£ 1,138,077
Southern Housing				£ -	£ 146,487	£ 179,779	£ 179,779	£ 506,045				£ -	£ 146,487	£ 179,779	£ 179,779	£ 506,045
Stonewater Limited				£ -	£ 342,374	£ 420,187	£ 420,187	£ 1,182,748				£ -	£ 342,374	£ 420,187	£ 420,187	£ 1,182,748
Sustain (UK) Ltd				£ -	£ 205,889	£ 252,682	£ 252,682	£ 711,254				£ -	£ 205,889	£ 252,682	£ 252,682	£ 711,254
The Pioneer Housing and Community Group Limited				£ -	£ 244,178	£ 299,673	£ 299,673	£ 843,524				£ -	£ 244,178	£ 299,673	£ 299,673	£ 843,524
Trident Housing Association Limited				£ -	£ 261,352	£ 320,750	£ 320,750	£ 902,853				£ -	£ 261,352	£ 320,750	£ 320,750	£ 902,853
Walsall Housing Group Limited				£ -	£ 1,985,146	£ 2,436,315	£ 2,436,315	£ 6,857,776				£ -	£ 1,985,146	£ 2,436,315	£ 2,436,315	£ 6,857,776
Watsons Community Homes				£ -	£ 170,935	£ 209,783	£ 209,783	£ 590,502				£ -	£ 170,935	£ 209,783	£ 209,783	£ 590,502
Small Housing associations				£ -	£ 751,325	£ 922,080	£ 922,080	£ 2,595,485				£ -	£ 751,325	£ 922,080	£ 922,080	£ 2,595,485
HA subtotal	£ -	£ -	£ -	£ -	£ 12,724,329	£ 15,616,222	£ 15,616,222	£ 43,956,772	£ -	£ -	£ -	£ -	£ 12,724,329	£ 15,616,222	£ 15,616,222	£ 43,956,772
Non LA public sector organisations	£ 324,700	£ 1,599,060	£ 1,599,060	£ 3,522,821	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ -	£ 324,700	£ 1,599,060	£ 1,599,060	£ 3,522,821
Total	£ 3,247,000	£ 15,990,604	£ 15,990,604	£ 35,228,209	£ 27,301,546	£ 33,506,443	£ 33,506,443	£ 94,314,432	£ 4,941,456	£ 11,567,500	£ 11,567,500	£ 28,076,456	£ 35,490,003	£ 61,064,547	£ 61,064,547	£ 157,619,097

Organisation name	Number of social homes upgraded to EPC C	Number of low income private homes upgraded to EPC C	Total household bill savings over 2025 – 2069 (£)	Total domestic carbon emissions savings over 2025 – 2069 (Kt CO2e)	Annual direct carbon emission savings from public sector buildings (KtCO2e)
Birmingham City Council	3228	625	40,039,050.3	101.75	1.12
Coventry City Council	0	220	2,382,540.2	6.05	0.50
Dudley MBC	367	209	6,048,937.0	15.37	0.36
Sandwell MBC	1483	181	17,247,107.7	43.83	0.33
Solihull MBC	245	147	4,121,690.0	10.47	0.48
Walsall MBC	0	164	1,771,166.1	4.50	0.30
City of Wolverhampton Council	1244	154	14,488,581.6	36.82	0.15
	0		-	0.00	
Anchor Hanover Group	76		785,028.0	2.00	
Black Country Housing Group Limited	94		970,375.4	2.47	
Bournville Village Trust	118		1,215,784.6	3.09	
Bromford Housing Association Limited	282		2,908,310.7	7.39	
Citizen Housing Group Limited	1082		11,154,155.0	28.35	
Clarion Housing Association Limited	149		1,534,863.5	3.90	
GreenSquareAccord Limited	508		5,240,871.6	13.32	
Housing 21	49		503,487.8	1.28	
Longhurst Group Limited	120		1,239,246.3	3.15	
Midland Heart Limited	952		9,815,431.2	24.94	
Nehemiah United Churches Housing Association Limited	56		573,872.9	1.46	
Orbit Housing Association Limited	76		787,374.2	2.00	
Platform Housing Limited	171		1,762,911.1	4.48	
Sanctuary Housing Association	148		1,530,171.2	3.89	
Southern Housing	66		680,388.9	1.73	
Stonewater Limited	154		1,590,233.1	4.04	
Sustain (UK) Ltd	93		956,298.3	2.43	
The Pioneer Housing and Community Group Limited	110		1,134,137.9	2.88	
Trident Housing Association Limited	118		1,213,907.7	3.08	
Walsall Housing Group Limited	894		9,220,442.8	23.43	
Watmos Community Homes	77		793,943.5	2.02	
	0		-	0.00	
Small Housing associations	338		3,489,691.3	8.87	
	0		-	0.00	
Non LA public sector organisations					0.36

Appendix 3 – Climate Adaptation and Resilience Checklist

Climate Adaptation Definitions

- Climate change adaptation - adjustments made to natural or human systems in response to the actual or anticipated impacts of climate change, to mitigate harm or exploit beneficial opportunities. (NPPF, 2023, Annex 2 Glossary)
- Climate resilience – the goal of adaptation is climate resilience, where our communities, infrastructure and natural environment can withstand, cope with, bounce back and benefit from climate impacts.
- Climate hazards – climate-related physical event or trend that may cause loss of life, injury, or other health impacts, as well as damage and loss to property, infrastructure, livelihoods, service provision, ecosystems and environmental resources. These might be high/low temperatures, heavy rainfall or a lack of rainfall, storms and high winds.
- Climate impacts - the effects of climate hazards on lives, livelihoods, health and wellbeing, ecosystems and species, economic, social and cultural assets, services, and infrastructure.
- Climate risks –
- Climate vulnerability – an individual, group or area’s predisposition to be adversely affected by climate hazards.

Climate Adaptation General Resources

- [Local Authority | The Met Office climate data portal](#)
- [Summary of Climate Impacts facing the West Midlands](#)
- WMCA Climate Risk and Vulnerability Assessment mapping tool
- DEFRA Overheating in housing tool – this looks at areas that are more prone to overheating risk by 2030, and the impact of different approaches to mitigating overheating risk, including insulation and shading - <https://environment.data.gov.uk/over-heating/>

Climate Risk and Adaptation Checklist

Hazard (definition)	Risk	Resources/inputs you may need	Plan for mitigating this risk
High and extreme high temperatures	<ul style="list-style-type: none"> • Ability to work • Overheating and reduced thermal comfort for dwellers 	TM52 The limits of thermal comfort: avoiding overheating (2013)	

Hazard (definition)	Risk	Resources/inputs you may need	Plan for mitigating this risk
<p>Summer days are the annual number of days where daily maximum temperatures exceed 25C.</p> <p>Temperatures exceeding 27C for at least three consecutive days is considered a heatwave in the West Midlands.</p> <p>Extreme summer days are the annual number of days where the daily maximum temperature is above 35C.</p> <p>Tropical nights are the annual number of nights where the daily minimum temperature is above 10C.</p>	<ul style="list-style-type: none"> • Heat stress and adverse health Outcomes • Reduced indoor air quality and increased humidity 	<p>TM59 Design methodology for the assessment of overheating risk in homes (2017)</p> <p>Good Homes Alliance - 'Overheating in Buildings' Retrofit and Existing Homes: Tool and guidance to identify and mitigate overheating risks in Buildings' Retrofit and existing homes</p> <p>Good Homes Alliance: Overheating in New Homes</p> <p>WMCA Climate Risk and Vulnerability Assessment mapping</p> <p>PAS 2035</p> <p>Building Regulations Part F: Means of ventilation</p> <p>Building Regulations Part O: technical standards to mitigate overheating</p> <p>Check your postcode: Is your area vulnerable to extreme heat? - BBC News</p>	
<p>Low and Extreme low temperatures</p> <p>Extreme low temperatures are where temperatures drop below 0C. At present,</p>	<ul style="list-style-type: none"> • Reduced ability to work • Unsafe working conditions 	<p>WMCA Climate Risk and Vulnerability Assessment mapping</p> <p>PAS 2035</p>	

Hazard (definition)	Risk	Resources/inputs you may need	Plan for mitigating this risk
<p>the UK experiences 45-56 cold days a year.</p> <p>Heating degree days - the number of degrees the daily mean temperature is below 15.5°C, each day, added up over a year. One Heating Degree Day is one day in which daily mean temperature is below the threshold by 1°C. For example, if the average temperature for a specific day is 15°C, this would contribute 0.5 Heating Degree Days to the annual sum.</p>	<ul style="list-style-type: none"> Excessive insulation of properties in the long-term 		
<p>High Winds and Storms</p> <p>Near gale: 32-38 mph - whole trees in motion; inconvenience felt when walking against the wind.</p> <p>Gale: 39-46 mph – twigs break off trees, generally impedes progress.</p> <p>Strong Gale: 47-54 mph - slight structural damage (chimney pots and slates removed).</p> <p>Storm: 55-63 mph - seldom experienced inland; trees uprooted; considerable structural damage.</p> <p>“Driving conditions can become difficult and</p>	<ul style="list-style-type: none"> Risk to photovoltaics fixtures Reduced ability to work Unsafe working conditions 	<p>WMCA Climate Risk and Vulnerability Assessment mapping</p>	

Hazard (definition)	Risk	Resources/inputs you may need	Plan for mitigating this risk
<p>potentially dangerous when wind reaches speeds of 30-45 mph. When the wind speed goes above 45 mph it will be more dangerous to drive – we recommend avoiding driving if you can.” The AA</p>			
<p>Drought Drought is defined as a lack of water; this tends to build up over time and can last from as little as a few weeks up to several years. Definition of types of droughts</p> <ul style="list-style-type: none"> • Meteorological drought – when rainfall in an area is below average for the region • Agricultural drought – when lack of rainfall or dry soil affects farming and crop growth • Ecological drought – like agricultural drought, but when lack of water affects the local environment as well • Hydrological drought – when water supplies such as streams and reservoirs are low, which can be 	<p>Ground movement</p>	<p>Severn Trent (free measures)</p>	

Hazard (definition)	Risk	Resources/inputs you may need	Plan for mitigating this risk
<p>caused by low rainfall, lack of snow melt, or other reasons</p> <p>The types of droughts likely to affect domestic properties is meteorological and hydrological.</p>			
<p>Increased precipitation In winter periods, the WMCA area experiences an average of 195mm of rainfall.</p> <p>Extreme daily rainfall totals more than 50 mm/day.</p> <p><u>Surface water flooding</u> A typical ‘wet day’ would be one with rainfall totals of 1mm or more. Extreme daily rainfall totals lead to surface water flooding - when the ground is over-saturated and/or drainage systems are overflowed, and the excess water cannot be absorbed or drained away.</p> <p><u>Fluvial (river-based) flooding</u> When the water level in a river, lake or stream rises and overflows onto the neighbouring land. The water level rise of the river</p>	<ul style="list-style-type: none"> • Higher humidity • Gutters and drains overflowing • Exposure of building elements to water • Surface water flooding • Damage to insulation (both internal and external) • Ground movement • Reduced ability to work • Unsafe working conditions 	<p>WMCA Climate Risk and Vulnerability Assessment mapping</p> <p><u>WMCA guide to nature-based sustainable drainage systems (SuDS)</u></p> <p>Environment Agency - <u>Flood map for planning - GOV.UK</u></p> <p>Environment Agency long-term flood risk mapping - <u>Check the long term flood risk for an area in England - GOV.UK</u></p>	

Hazard (definition)	Risk	Resources/inputs you may need	Plan for mitigating this risk
could be due to excessive rain or snowmelt.			

https://www.london.gov.uk/sites/default/files/gla_migrate_files_destination/Adaptation-oct11.pdf

Appendix 4 – Approach to Whole House Buildings’ Retrofit

Level	Description	Concerns / Risks	Scope for use
Every part of the house	Multiple technical measures in a “pick & mix” approach (eg the Green Deal.)	No understanding of connective effects, ignores occupant engagement, monitoring and feedback, heritage and health. Multiple unintended effects.	Should not be carried out, except where technologies are entirely independent of each other.
Insulation of all walls	Improved thermal coherence and air tightness on external walls. This approach is promoted by many in EWI industries.	Impossible on complex buildings. Only partial integration of connective effects, ignores systemic effects and occupant engagement. Risks to Indoor Air Quality and Heritage.	Only if ventilation, windows, floors and lofts are also included (as in WHM). Not appropriate for traditional or complex buildings.
Whole House Minimum (WHM)	Insulation and airtightness/ thermal coherence of whole building shell (ie walls roofs floors and windows/doors) plus effective ventilation.	Assumes that technical solutions are available. Does not deal with uncertainties, behaviour, heritage, renewables etc. Technical failures may occur in complex buildings with heritage risks to streetscapes.	Can be applied at scale on low risk (non-complex, good condition, not exposed to driving rain etc) and non-traditional buildings.
Whole House Plus (WHP)	Integration of all services and occupant behaviour, plus maintenance and feedback in a broader programme.	Requires additional education training, skills, different funding, changes to standards and a knowledge feedback mechanism. No community context, so heritage risks and lost opportunities.	Can be applied at scale on low/ mid risk properties. Avoid heritage buildings and conservation areas.
Whole House Advanced (WHA or Responsible Retrofit)	As WHP plus integration of heritage and community context, including district schemes for renewable energy, local employment.	Needs a completely new approach from government. Challenge of different values and a framework for resolving value conflicts and priorities will be needed.	Can be applied widely to all building types.

Source: <https://stbauk.org/wp-content/uploads/2020/08/STBA-What-is-Whole-House-Retrofit-Nov2016.pdf>

Appendix 5 – After Housing Costs Income Eligibility

The table below shows the tailored AHC income thresholds based on the composition of adults and dependants in the household. If a household has an AHC income below their corresponding threshold, and the property eligibility criteria in Section 5 are met, then the relevant Grant Applicant is eligible for the Scheme.

Occupants	Maximum eligible 'after housing costs' income
1 adult	N/A for-household income beyond £20k after housing costs
1 adult + 1 dependent	N/A for-household income beyond £20k after housing costs
1 adult + 2 dependents	N/A for-household income beyond £20k after housing costs
1 adult + 3 dependents	£23,600
1 adult + 4 dependents	£27,600
1 adult + 5 dependents	£31,600
2 adults	N/A for-household income beyond £20k after housing costs
2 adults + 1 dependent	£24,000
2 adults + 2 dependents	£28,000
2 adults + 3 dependents	£32,000
2 adults + 4 dependents	£36,000
2 adults + 5 dependents	£40,000

Appendix 6 – Subsidy Control

The Buildings' Retrofit Pilot will not grant any subsidies that are considered to be of particular interest, as defined in Section 3 of the Subsidy Control Regulations 2022.

Direct Subsidy

In some instances, Public Sector Organisations can operate as enterprises as defined in Section 7(1) of the Subsidy Control Act 2022. If, in connection with the delivery of Grant through the Scheme, a Grant Recipient is undertaking any economic activity, meaning that works funded by the Grant directly impact any economic activity they are undertaking, the Grant Recipient must cooperate with WMCA to ensure compliance with the Subsidy Control Act 2022.

A Public Sector Body will be an enterprise if it is engaged in any economic activity by offering goods or services on a market. Grant Applicants will be expected to consider this as part of their Grant Application, using the Public Buildings Application Form.

WMCA is unable to advise other parties on the position of public sector organisations applying to the Scheme; please refer to the UK Government subsidy control guidance²⁰ or engage with legal advisers when completing an application

Further information on the subsidy control regime is available on the gov.uk website, including information on enterprises in the context of public powers in Annex 1, Limb B1 of the above referenced Statutory Guidance for the UK Subsidy Control Scheme.

Indirect Subsidy – Energy Bill Savings

An indirect subsidy may occur in buildings owned by a public sector Grant Recipient but leased to an enterprise (as defined in Section 7(1) of the Subsidy Control Act 2022). This indirect subsidy may occur if the enterprise is paying any portion of the building's energy bills and therefore benefits from any savings to the energy bill because of Pilot-funded measures. An enterprise is any organisation engaged in an economic activity that entails offering goods or services on a market, to the extent that they are engaged in such an activity.

An enterprise must not receive energy bill savings because of the installation of Pilot-funded measures that cause the enterprise to exceed their MFA threshold of £315,000. Any energy bill savings that do occur and exceed the MFA threshold must be recovered from the enterprise by the Grant Recipient. Any MFA subsidies will need to comply with the

²⁰ <https://www.gov.uk/government/publications/uk-subsidy-control-statutory-guidance>

transparency requirements set out in Chapter 3 of Part 2 of the Subsidy Control Act, unless the amount of the subsidy is no more than £100,000. MFA subsidies are also subject to cumulation rules, meaning that a new MFA subsidy given through the Scheme would cumulate with any previous MFA subsidies given to the same beneficiary within the current and two previous financial years. This may cause the total amount to go over the MFA threshold of £315,000.

While it is required that an enterprise does not exceed the MFA threshold of £315,000 from energy bill savings, it is strongly encouraged that all energy bill savings are recovered by the Grant Recipient from the enterprise. Full recovery of energy bill savings would mean no indirect subsidy will occur and no subsidy control rules will need to be followed.

Indirect Subsidy – Buildings Owned by an Enterprise and Leased to the Public Sector

Buildings that are rented by the public sector but owned by a private landlord may benefit from Pilot funding, providing they have an eligible public sector tenant as the Grant Applicant. If the landlord is classed as an enterprise under the Subsidy Control Act, then this enterprise may be in receipt of an indirect subsidy due to benefitting from the value of the new measures installed in their building using Pilot Grant funding. This indirect subsidy may be Granted providing it is being used for the subsidy's intended purpose of decarbonising the public sector over the full lifetime of the carbon savings being funded.

To ensure any Grant is only funding carbon savings over the period it is used by the public sector, the estimated longevity that is given to measures in the building will be capped at the remaining lease period of the Grant Applicant, unless satisfactory evidence is produced by the Grant Applicant showing it is their intention to retain the building within public ownership beyond the current lease period. This means that, without such satisfactory evidence, for the purposes of calculating the Grant Application's Grant carbon cost (see Section 5.5), any measures saving direct carbon emissions are assumed to only be doing so for the remaining period of the lease. For example, in a building where a Grant Applicant has 10 years remaining on their lease, the maximum estimated longevity for measures installed in that building would be capped at 10 years. Buildings owned by the public sector are assumed to be used by the public sector and so will not have the estimated longevity capped in this way.

If a building's estimated longevity has been capped, but the Grant Applicant is 'highly certain' that the lease will be renewed or the building will continue to be used by the public sector, the Grant Applicant should include the renewal length in the lease period within the Grant Application form to request an exemption to the rules on capping carbon savings described above. If the Grant Applicant includes the lease renewal length but the lease does not get renewed, then it could result in a misuse of the subsidy.

If, for any reason, including early termination of the lease, the building stops being occupied by a Public Sector Body before the full lifetime of the direct carbon savings has elapsed, then the purpose of the indirect subsidy would not be fulfilled, resulting in a misuse of the subsidy. Any amount of subsidy misused by the enterprise in this way will be liable to financial recovery. The financial recovery value will be equal to the proportion of the subsidy that has been misused. For example, where Grant has provided Grant funding for 10 years of public sector carbon savings, should the public sector stop occupying the building after seven years this would mean three years of carbon savings would not be used for the subsidies intended purpose, meaning that the proportion of misused subsidy would be 30%. See the Subsidy Control Act for further details.

To mitigate the risk of a subsidy being misused, any public sector authority occupying a building owned by a private sector landlord and wishing to benefit from the Scheme will have to provide further information to WMCA to ensure that the Grant being given is compliant with subsidy control law.

Evidence required

In cases where the landlord is an enterprise and is in receipt of an indirect subsidy, further information will be required to ensure that the Grant being given is compliant with subsidy control law. For this reason, the Grant cannot be confirmed until satisfactory evidence has been returned. This will include ensuring private sector landlords understand that Grant funding could be recovered from them if their lease with the Public Sector Body terminates early, before the lifetime of the installed technologies. This is because this may be considered a misuse of subsidy under the Subsidy Control Act 2022.

A copy of the leasehold agreement to evidence the remaining lease length must be provided with the Grant Application form. The Grant Applicant must provide the outstanding lease period (including renewals if the Grant Applicant can evidence high confidence in a renewal) and the current expiry date of the lease (not including any prospective renewals).

If Grant Applicants wish to also use the exemption detailed above, where the lease will be renewed and intend to utilise the extended lease period, strong evidence should be provided to WMCA to support this claim. This evidence will need to be satisfy that it is their intention that the building is to remain in public use beyond the end date of the current lease. The evidence will differ between buildings, but examples include:

- A legal agreement with the landlord that the lease will be renewed or extended;
- Strong evidence that the building or site in question is designated solely for use by a public sector authority;

- Strong evidence that the leaseholder is entitled to a new lease on the same terms as the old lease subject to reasonable modernisation and at a new market rent, such as those covered by the Landlord and Tenant Act 1954.

Any requests to use this exemption will be assessed on a case-by-case basis.

Indirect Subsidy – PFI Buildings

PFI buildings are eligible for the Scheme. As with all buildings, PFI buildings need to follow the indirect subsidy control rules outlined above. The majority of PFI buildings will be owned by an enterprise but occupied by the public sector. They are therefore subject to the misuse of subsidy rules outlined in this Appendix 6. Where the ownership of the PFI building freehold transfers to the Grant Applicant, at no additional cost, at the expiry of the PFI contract, these buildings will not have any cap on the estimated longevity given to measures in that building. For these PFI buildings, the Grant Applicant should select the building ownership as ‘PFI – Transfer Clause’ the Grant Application form. For PFI buildings that do not transfer to the public sector, the estimated longevity that is given to measures in the building will be capped at the remaining PFI contract length, as per the rules outlined above regarding buildings owned by an enterprise.

Evidence required

A copy of the PFI contract is required to show either the transfer clause in the contract or the remaining PFI length and must be provided in the Grant Application portal under additional supporting evidence.

Appendix 7 – Examples of Eligible Measures

	Category of measure	Measure	Direct CO2 savings	Indirect CO2 savings	Estimated Longevity (Years)
1	Building Fabric Insulation	External wall insulation	✓		60
		Internal wall insulation	✓		60
		Cavity wall insulation	✓		40
		Floor insulation – suspended floor	✓		30
		Floor insulation – solid floor	✓		30
		Loft insulation	✓		30
		Loft insulation top-up	✓		30
		Rafter insulation	✓		30
		Secondary glazing	✓		20
		Upgrade glazing (retaining frames)	✓		20
		Window replacement (including frames)	✓		20
2	Air Tightness	Draught proofing	✓		10
		Draught lobbies	✓		30
		Fast closing doors	✓		15
		Automatic/revolving doors	✓		15
3	Heat Source	Air source heat pump (air to water)	✓		20
		Air source heat pump (air to air)	✓		20
		Water source heat pump	✓		25
		Ground source heat pump	✓		25
		Connect to offsite district heating	✓		30
		Connect to onsite district heating	✓		30
		Biomass	✓		20
		Electric boiler	✓		20
		Electric heater	✓		20
		Solar thermal	✓		25

	Category of measure	Measure	Direct CO2 savings	Indirect CO2 savings	Estimated Longevity (Years)
		DHW – electric point of use heaters	✓		10
4	Heat Distribution and Control	Heat recovery	✓		15
		Heating controls	✓		10
		Heat distribution pipework replacement	✓		20
		Plate heat exchanger	✓		20
		Steam trap replacements	✓		10
		Thermal store	✓		20
		Phase change material	✓		25
		Heating pipework insulation	✓		20
5	Domestic Hot Water Distribution	Hot water - flow restrictors for taps	✓		10
		Hot water - efficient taps	✓		10
		Hot water - efficient showers	✓		10
		Hot water - distribution improvements	✓		20
		Hot water - pipework insulation	✓		20
6	Cooling	Cooling – control system		✓	10
		Cooling – plant replacement/upgrade		✓	10
		Energy efficient chillers		✓	15
		Free cooling		✓	15
		Replace a/c with evaporative cooling		✓	15
7	Ventilation	Added ventilation - system or localised			25
		Fans – air handling unit		✓	25
		Fans – high efficiency		✓	15
		Ultrasonic humidifiers		✓	10
		Ventilation – distribution		✓	25
		Ventilation – presence controls		✓	10
8	Building Management	Building management system	✓		10
9	Lighting	Lamp replacement		✓	5

	Category of measure	Measure	Direct CO2 savings	Indirect CO2 savings	Estimated Longevity (Years)
		Lighting controls		✓	15
10	Motors and Drives	Fixed speed motor controls	✓	✓	10
		Motors – flat belt drives	✓	✓	10
		Variable speed drives	✓	✓	10
		Motors – high efficiency		✓	15
11	Appliances	Energy Efficient Ovens	✓	✓	10
		Energy Efficient Dishwashers	(✓)	✓	20
		Energy Efficient Washing machines	(✓)	✓	20
		Refrigeration Appliances		✓	10
12	Process Energy Use	IT processes - data servers, etc.		✓	10
		Energy efficient steriliser	(✓)	✓	20
		Swimming pool covers	(✓)	✓	10
13	Renewable Electricity Generation	Solar PV		✓	25
		Wind turbine		✓	20
		Small hydropower		✓	20
14	Electricity Storage	Battery storage with renewables		✓	10
		Battery storage without renewables		✓	10
15	Metering	Smart metering	(✓)	✓	20
		Electric sub-metering		✓	20
		Heat metering	(✓)	✓	10
16	Power Supply	Incoming electricity supply upgrade		✓	30
		Uninterruptible power supply upgrade		✓	30
		Low loss transformers		✓	30
		Transformer tapping change		✓	30

Appendix 8 – Requirements for Non-Domestic Buildings' Retrofit Assessments

1. Context

Context is anything which can or should inform the selection of Buildings' Retrofit measures for a particular building. It includes but is not limited to:

- Description of the building
 - Location, position (e.g. in street) and size (+ floor plans if available)
 - Built form, orientation and exposure (+ photos of elevations)
 - Main Construction Type (e.g. steel frame)
 - Major Modifications (extensions, etc, if any)
 - Listing / conservation area status (if any)
 - Statement of significance (if relevant)
 - Planning constraints (if any)
- Ownership and Tenure
- Occupancy pattern
- Medium/Long term plans for the building (e.g. disposal, change of use, lease agreements)
- Incoming services
- Priorities for Buildings' Retrofit, intended outcomes from the Project.

2. Energy use

Provide energy use data for all services over most recently available 12-month period, monthly if available, with sub-metered data where available.

Compare with relevant benchmarks.

3. Building Fabric Elements

The building fabric elements to be assessed all are those that form the thermal envelope of the building:

- Walls
- Roof
- Ground Floor
- Windows
- Doors

Where a building has been extended and the extension is of a different construction, these should be identified and assessed separately.

For each building fabric element, the Assessment should include:

- a) Existing construction;
- b) Defects (if any) to be remedied prior to Buildings' Retrofit;
- c) Opportunities for thermal improvement (if any).

The Building Fabric section of the Assessment should also highlight connections and interactions between thermal elements. For example, if there is a recommendation to insulate a roof but not the walls, thermal bridging may result at the wall/roof junction and lead to an increased risk of condensation, in some circumstances.

4. Heating and cooling systems

Details of existing heating plant and distribution for space heating, space cooling and domestic hot water should be recorded here, including approximate age of heating plant and condition of all key plant and distribution systems. Any missing insulation to distribution pipework and valves should also be recorded. Efficiency of distribution pumps should be assessed and the presence of VSDs noted.

Control systems and key settings (temperatures and timings) should also be assessed and compared with patterns of occupancy to determine whether any savings are available from improved control measures.

5. Ventilation

Describe the existing ventilation system.

- Where there is a whole-building system in place, coverage, condition and any faults should be recorded.
- Where there is no whole-building system in place and operating adequately in each habitable room, the Assessment should cover:
 - Background ventilation – e.g. air bricks or trickle vents and whether these are permanently open²¹
 - Door undercuts in each room
 - Purge ventilation – whether there are openable windows in each room
 - Extraction from all wet rooms

²¹ Blocked or missing sub floor vents should be covered under ground floors in Building Fabric - Section 2.

It is a requirement of the Building Regulations Part F that the ventilation post Buildings' Retrofit be no worse than when renovation works began. If there are recommendations for any Buildings' Retrofit measures which could lead to reductions in designed or natural ventilation (e.g. draught proofing, window replacement) then a ventilation strategy must be included in the Buildings' Retrofit recommendations in this report and then implemented if the fabric measures are to proceed.

However, WMCA encourage participants to ensure that all habitable rooms are adequately ventilated. If they were not adequately ventilated prior to Buildings' Retrofit, then ventilation should in any case be improved to a *minimum agreed standard*.

6. Lighting

The lighting assessment should cover the whole building, and include:

- Lamps: record main lamp types used.
- Control: record control systems - simple switching, presence detection and daylight sensors where relevant. Cross reference with Occupation (Section 1).
- Daylighting: maintenance of existing windows and rooflights, and identification of any opportunities to introduce more.

7. Power use

Process energy use – if any – should be identified and if further specialist input is required to assess opportunities for energy savings, then this should be highlighted.

Other significant power use should be recorded – e.g. for data centres and their cooling.

Any opportunities to use waste heat from process energy use on the site, or adjacent to the site, should also be identified.

8. Renewable energy generation

If there is any existing renewable energy generation at the site then the type, size, age and condition of the system should be recorded, together with any battery storage (if electrical energy).

The Assessment should also identify any opportunities for adding renewable energy generation at the site – e.g. size of suitably oriented areas of roof.

9. Summary of opportunities and interactions

Summarise all opportunities/recommendations from Sections 3 - 6. 

Highlight interactions between different elements of building fabric where Buildings' Retrofit is under consideration, and between fabric and services - including heating, cooling and ventilation systems.

Evidence Requirements

All sections of the Assessment should be supported by appropriate digital documentation and images.

While the requirements set out above represent the minimum standard for an RA, it is strongly recommended that additional investigations be undertaken where appropriate to support a more detailed understanding of the building's performance and condition, such as thermographic survey, air permeability tests, borescope investigations, flow rate measurements. These further investigations should be considered on a case-by-case basis depending on the complexity of the Buildings' Retrofit.

Grant Applicants are encouraged to install monitoring technologies where possible to help inform the best approach to retrofitting buildings and monitor the effects and impacts of installations. This could include CIBSE TM68 and Guide A, BS 40101 (in-use building performance evaluation), BREEAM In-Use Certifications and smart HTC's. This will not only help identify how money can best be spent in buildings but also provide a useful comparison with modelled savings provided by DEC's and feasibility studies and useful evidence to support a wider range of Buildings' Retrofit approaches and technologies.

Appendix 9 – Good-Practice Standards and Guides for Non-Domestic Buildings’ Retrofit

ASHRAE Standards – has some 87 active standards and guideline Project committees, addressing such broad areas as indoor air quality, thermal comfort, energy conservation in buildings, reducing refrigerant emissions, and the designation and safety classification of refrigerants.

BREEAM In-Use Certifications – holistic environmental assessment method, which seeks to drive improvements in existing buildings operational performance.

British Standards:

- BS 40101 (building performance evaluation)
- BS 8233 (environmental sound reduction)
- BS 8544
- BS EN 15804 (sustainability of construction works and environmental product declarations)
- BS EN 15978 (sustainability of construction works and assessment of environmental performance of buildings)
- BS ISO 15686-5 and PD 156865 (performing life cycle cost for buildings)

Building Services Research and Information Association (BSRIA) Bookshop – guidance and services to improve building environmental, operational and occupational values

CIBSE Technical Memoranda:

- Guide A (environmental design)

Institution of Structural Engineers (IStructE) Guides – various publications on best practice building design, planning, engineering, and more.

LEED Green Building Certification – provides a framework for healthy, highly efficient, and cost-saving green buildings, which offer environmental, social and governance benefits.

LETI (London Energy Transformation Initiative) Guides – various publications on best practice building performance, evaluation, planning and more.

National Public Sector Decarbonisation Scheme (PSDS) guidance notes – ensuring high-quality, cost-effective Buildings’ Retrofit solutions.

PAS 2038:2021 (or later) – the recognised standard for non-domestic Buildings’ Retrofit.

PAS 2080:2023 (or later) – the recognised standard for holistic carbon management in buildings.

RIBA (Royal Institute of British Architects) 2030 Climate Challenge – sets a series of targets for practices to adopt to reduce operational energy, embodied carbon and potable water.

RICS Whole Life Carbon Assessment – measure whole-life carbon emissions, manage carbon budgets, reduce life cycle emissions and deliver a net-zero future for the built environment.

- Society of Light and Lighting (SSL)
- TM52 and TM59 (overheating)
- TM65 (embodied carbon)
- TM68 (monitoring indoor environmental quality)

UK Net Zero Carbon Building Standard (BBP, BRE, CIBSE, Carbon Trust, IStructE, LETI, RIBA, RICS and UKGBC) – enables industry to robustly prove their built assets are net zero carbon and in line with our nation’s climate targets.

UKGBC (UK Green Building Council) Whole Life Carbon Roadmap – provides detail on the Project structure, the process for data collection, the key features of the calculation methodology and concludes with a description of the net zero scenario definition and results.

WELL Building Standards – a holistic approach to health in the built environment addressing behaviour, operations and design.