

# MDA No.: 1308

## Title: Housing Committee – Retrofitting London’s Homes Letters

### 1. Executive Summary

- 1.1 At the Housing Committee meeting on 20 July 2021 the Committee discussed the challenges of retrofitting in London with invited guests and resolved that:

*Authority be delegated to the Chair, in consultation with the party Group Lead Members, to agree any output arising from the discussion*

- 1.2 Following consultation with party Group Lead Members, the Chair agreed the Committee’s letters to the Mayor of London and to The Rt Hon Michael Gove MP, Secretary of State for Levelling Up, Housing and Communities on retrofitting London’s housing stock, as attached at **Appendices 1 and 2**.

### 2. Decision

- 2.1 **That the Chair, in consultation with party Group Lead Members, agrees the letters to the Mayor of London and to The Rt Hon Michael Gove MP, Secretary of State for Levelling Up, Housing and Communities on retrofitting London’s housing stock, attached at Appendices 1 and 2.**

#### Assembly Member

I confirm that I do not have any disclosable pecuniary interests in the proposed decision and take the decision in compliance with the Code of Conduct for elected Members of the Authority.

The above request has my approval.

Signature:



Printed Name:

**Siân Berry AM, Chair of the Housing Committee**

Date:


**5 October 2021**

### 3. Decision by an Assembly Member under Delegated Authority

#### Background and proposed next steps:

- 3.1 The scope and terms of reference for this investigation on the challenges of retrofitting in London was agreed by the Chair, in consultation with relevant party Lead Group Members and the Deputy Chairman, on 29 June 2021 under the standing authority granted to Chairs of Committees and Sub-Committees. Officers confirm that the letters and their recommendations fall within these terms of reference.
- 3.2 The exercise of delegated authority approving the letters to the Mayor of London and to The Rt Hon Michael Gove MP, Secretary of State for Levelling Up, Housing and Communities will be formally submitted to the Housing Committee's next appropriate meeting for noting.

#### Confirmation that appropriate delegated authority exists for this decision:

Signature (Committee Services): 

Printed Name: Diane Richards, Committee Officer

Date: 4 October 2021

Telephone Number: 07925 353 478

#### Financial Implications: NOT REQUIRED

Note: Finance comments and signature are required only where there are financial implications arising or the potential for financial implications.

Signature (Finance): Not Required

Printed Name: Not Required

Date: Not Required

Telephone Number: Not Required

#### Legal Implications:

The Chair of the Housing Committee has the power to make the decision set out in this report.

Signature (Legal): 

Printed Name: Emma Strain, Monitoring Officer

Date: 4 October 2021

Telephone Number: 020 7983 6550

#### Supporting Detail / List of Consultees:

- Andrew Boff AM and Sem Moema AM

#### 4. Public Access to Information

- 4.1 Information in this form (Part 1) is subject to the FoIA, or the EIR and will be made available on the GLA Website, usually within one working day of approval.
- 4.2 If immediate publication risks compromising the implementation of the decision (for example, to complete a procurement process), it can be deferred until a specific date. Deferral periods should be kept to the shortest length strictly necessary.
- 4.3 **Note:** this form (Part 1) will either be published within one working day after it has been approved or on the defer date.

##### **Part 1 - Deferral:**

Is the publication of Part 1 of this approval to be deferred? **NO**

If yes, until what date:

##### **Part 2 – Sensitive Information:**

Only the facts or advice that would be exempt from disclosure under FoIA or EIR should be included in the separate Part 2 form, together with the legal rationale for non-publication.

Is there a part 2 form? **NO**

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#### **Lead Officer / Author**

Signature:



Printed Name: Steph Griffiths

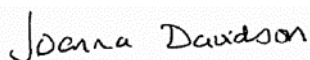
Job Title: Senior Policy Adviser

Date: 4 October 2021

Telephone Number: 07783805834

#### **Countersigned by Executive Director:**

Signature:



Printed Name: Joanna Davidson

Date: 05 October 2021

Telephone Number: 07813 796 175

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## LONDON ASSEMBLY



**Sian Berry AM Chair of the Housing Committee**

**Sadiq Khan**

Mayor of London

(Sent by email)

6 October 2021

Dear Sadiq,

I am writing to you on behalf of the London Assembly Housing Committee regarding our recent investigation into retrofitting London's housing stock. To meet your ambitious target of making London a zero carbon city by 2030, you will understand the importance of taking action to decarbonise all of London's 3.5 million homes.

To support our investigation, we held a meeting on 20 July 2021 with a range of experts to discuss the structural challenges, costs and skills required to retrofit all of London's homes. Guests at our meeting included: Shirley Rodrigues (Deputy Mayor for Environment and Energy), James Hardy (Head of Energy for the GLA), Susan French (Chief Executive of Barnsbury Housing Association and Vice Chair of the g320), Councillor Adam Harrison (Cabinet member for a sustainable Camden in the London Borough of Camden) and Bradley Tully (Senior Public Affairs Officer from the Royal Institution of Chartered Surveyors). I am writing to share with you our key findings and recommendations. Please refer to **Appendix A** of this letter for a full list of our recommendations.

The Committee has also written to the Secretary of State for Levelling up, Housing and Communities, with a range of recommendations for the Government. I urge you to back the Committee's recommendations put forward both in this letter and those presented to the Secretary of State (see **Appendix B** for a list of these recommendations).

## The costs of retrofitting

At our meeting, we heard from the Deputy Mayor for Environment and Energy, Shirley Rodrigues, who outlined the scale of the challenge facing London as it attempts to decarbonise its housing stock. We were informed that the entirety of London's 3.5 million homes needed some form of work to reduce emissions, ranging from whole house retrofits to adapting energy infrastructure. The Deputy Mayor stated that £61 billion has been estimated as the cost of delivering infrastructure improvements in line with your 1.5C Compatible Climate Action Plan for London to become carbon neutral by 2050. To meet your 2030 target, we were told costs may be higher and that modelling for this was being updated. **I would be grateful if you could provide details of this modelling to the Committee once it has been completed.**

We were also told that despite the aspirations of your 2021 manifesto to retrofit millions of homes, there are tangible barriers which are likely to impact the pace and scale at which retrofitting can be delivered.<sup>1</sup> Specifically, issues concerning the lack of funding, inadequacies within the supply chain and the complexity of London's housing infrastructure.

While we were pleased to hear that some steps have already been taken to address these challenges, including the Innovation Partnership aimed at facilitating greater collaboration between local government, housing associations and developers, we feel that more can be done to accelerate a wide-scale retrofitting programme in London and to demonstrate real leadership in confronting the threat of climate change.

It is particularly disappointing that, under your Retrofit Accelerator Programme, just 1,600 homes will be retrofitted by August 2022. While we understand the Retrofit Accelerator is a successor programme and has a greater emphasis on deep home retrofit (involving greater carbon savings per household retrofit), it remains that the number of homes to be delivered compares unfavourably with previous programmes, for example the retrofitting of 130,000 homes between 2009 and 2016 under the RE:NEW programme,<sup>2</sup> and of 660 public sector buildings in the same period under the RE:FIT programme.<sup>3</sup>

We appreciate that to achieve the whole of your retrofitting ambitions, greater support from central Government may be required, but we strongly believe there are actions that you, as Mayor, can take to better support retrofitting in London. Below are some key actions that the Committee would like to see you take forward in light of our investigation.

## Heritage and Conservation

The Committee heard from Susan French, Chief Executive of Barnsbury Housing Association and Vice Chair of the g320, a group of small and medium housing associations, who stated that a key challenge was retrofitting listed buildings, which are often concentrated in conservation areas. It is often not possible to undertake extensive works on these buildings, in which case emissions need to

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<sup>1</sup> [Sadiq Khan, 2021 manifesto](#)

<sup>2</sup> [RE:NEW success, GLA](#)

<sup>3</sup> [RE:FIT Programme cuts carbon emissions from London's public buildings, C40 Cities, June 2017](#)

be offset through other measures. Listed buildings are not as energy efficient as new builds and need to be drastically upgraded to improve their energy performance in order for the UK to meet its climate obligations. There is not always a conflict, but where there is, a better balance should be struck between decarbonisation and preserving these areas and buildings without change. The Committee was told that to do this, dialogue will have to be started on planning standards and where compromises could be made within heritage properties to improve their energy efficiency. For example, solar panels offer an opportunity to offset emissions without making permanent, structural changes to a building.

Closely linked to this is public perception of risk and delay; homeowners are sometimes reluctant to carry out work over concerns that they will not be granted planning permission to do so. The Committee was told that the message being conveyed is: “heritage trumps everything else.”

London is home to many historically important buildings and homes, and it is important that these are decarbonised to not only improve energy efficiency but also ensure they remain viable for the future. We also note that one of your manifesto pledges was to continue to support London as a solar energy city and help make solar power more affordable and accessible for Londoners.<sup>4</sup>

You previously told the London Assembly that some local authorities have removed permitted development rights for solar panels due to concerns over visual impact. This means that, in these localities, planning permission is required for solar installation. You also informed us that as part of your Solar Action Plan, your officers would engage with boroughs to map the variance of planning approaches and help achieve consistency, where possible, across London.<sup>5</sup> Subsequently, you informed us that you have commissioned work to gather evidence and insights on the challenges and opportunities that existing planning regulations present to retrofitting residential properties (including installation of solar PV) in London, with recommendations due at the end of this year.<sup>6</sup>

***We recommend: a) that you inform the Committee of the outcome of your mapping exercise and commissioned review of planning issues with respect to retrofit and solar energy, b) that you advise whether there are any opportunities for you to use your planning powers to make it easier to secure consent for installation of solar panels across more areas of London and help Londoners to understand the rules governing installation of solar panels for listed buildings and conservation areas, and c) that this work results in more consistent conservation policies within boroughs to be as supportive as possible of retrofit and renewable energy.***

## **ECO Spending**

At our meeting, the Deputy Mayor highlighted that Government funding programmes to support retrofitting such as the Energy Company Obligation (ECO) are in place to help local authorities access vital resources for retrofitting programmes. However, it was brought to our attention that the existing ECO spending arrangement fails to meet the needs of Londoners. As you have highlighted, Londoners have paid £82.3 million annually to the ECO programme, while £27.3 million has been

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<sup>4</sup> [Sadiq Khan, 2021 manifesto](#)

<sup>5</sup> [MQT, Fitting solar panels in conservation areas, 16 May 2019](#)

<sup>6</sup> [MQT, Solar Panel Installation 1, 13 September 2021](#)

spent in return, a shortfall of £55 million every year.<sup>7</sup> We are aware that lobbying efforts have been conducted to ensure London receives a greater share of ECO spending.<sup>8</sup>

***We recommend that you continue to lobby for ECO spending which better matches what Londoners pay for energy and push the Government to ensure that London receives fair financial support or sufficient powers to raise this finance itself.***

### **Private Rented Sector**

At our Committee meeting, we heard about the importance of increasing the rates of retrofit in the private rented sector. This is particularly important for London, where a substantial population rent privately. Improvements in this sector will enable London to better meet its ambitions to adapt its housing stock to meet environmental targets, and it may also mean that those living in the private rented sector will pay less for energy in the future. We have recommended that Government should raise the landlord cost cap to £10,000 to increase the extent of works private sector landlords are undertaking to meet mandatory minimum energy efficiency standards, however we would also like to see action at a London level to identify where further improvements could be made.

***We recommend that you bring together private sector landlords and tenants to look at barriers to retrofit and the ways in which Government or local government action could overcome them.***

### **Affordable Homes**

At our Committee meeting, questions were raised as to whether homes currently being developed under the Affordable Homes Programme will require retrofitting in the future, to enable them to meet net zero carbon status. For both the 2016-23 and 2021-26 Affordable Homes Programmes can you confirm a) the number of starts, b) how many of those starts will deliver zero-carbon on-site c) the carbon offsetting provided for those starts that will not deliver zero-carbon on-site d) whether homes that are not currently zero-carbon have been built with consideration of the need for potential retrofit in future, for example by making them ready to take advantage of future improvements in technology.

We welcome the range of sustainability commitments in the new Affordable Homes Programme 2021-26, including that all developments of 10+ homes must be net zero-carbon. **As allocations have now been made for the next five years, please advise how many homes will not meet these commitments, for example developments of less than 10 homes or because they were otherwise negotiated?** Homes developed under the Affordable Homes Programme 2016-23 were required to meet previous London Plan requirements. **We would welcome your advice on whether any homes from either the 2016-23 or the 2021-26 Affordable Homes Programme will require retrofit in future and a timescale for this.**

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<sup>7</sup> [Mayor's written evidence to the Environmental Audit Committee inquiry into energy efficiency of existing homes, July 2020](#)

<sup>8</sup> [MQT, ECO funding, 13 September 2019](#)

There are real opportunities for London to make the case for support to implement a major programme of retrofitting. Given the unique nature of the London housing stock and the sheer scale of potential demand, this offers ample opportunity to support the development of a vital new market that will generate substantial economic gains, reduce energy costs for Londoners and demonstrate London's leadership in tackling the climate crisis. We hope you take on board and pursue the recommendations outlined in this letter and that we can engage constructively together going forward as we look to make retrofitting accessible for every Londoner.

I would be grateful for a response to this letter by 20 October 2021.

Yours,

A handwritten signature in black ink, appearing to read 'Sian Berry', with a stylized flourish at the end.

**Sian Berry AM**  
**Chair of the Housing Committee**



## Appendix A: The London Assembly Housing Committee's recommendations to the Mayor on retrofitting London's homes.

- 1. We recommend: a) that you inform the Committee of the outcome of your mapping exercise and commissioned review of planning issues with respect to retrofit and solar energy, b) that you advise whether there are any opportunities for you to use your planning powers to make it easier to secure consent for installation of solar panels across more areas of London and help Londoners to understand the rules governing installation of solar panels for listed buildings and conservation areas, and c) that this work results in more consistent conservation policies within boroughs to be as supportive as possible of retrofit and renewable energy.**
- 2. We recommend that you continue to lobby for ECO spending which better matches what Londoners pay for energy and push the Government to ensure that London receives fair financial support or sufficient powers to raise this finance itself.**
- 3. We recommend that you bring together private sector landlords and tenants to look at barriers to retrofit and the ways in which Government or local government action could overcome them.**

## Appendix B: The London Assembly Housing Committee's recommendations to the Government on retrofitting London's homes.

- 1. London should get its fair share of all retrofit spending, particularly ECO funding, or sufficient powers to raise finance itself. The Government should also outline what proportion of the Shared Prosperity Fund London will receive and ensure that this, at the very least, matches what Londoners pay for energy.**
- 2. The Government should consider implementing multi-year, user-friendly funding schemes. This would increase sector and homeowner confidence and give contractors and providers longer-term certainty on delivery of programmes.**
- 3. The Government should implement its proposal to raise the landlord cost cap to £10,000 to increase the extent of works private sector landlords are undertaking to meet mandatory minimum energy efficiency standards.**
- 4. The new Decent Homes Standard should mandate minimum energy efficiency standards, with a view to achieving net zero emissions at least in line with the Government's 2050 target.**
- 5. The Government should ensure that cladding remediation does not negatively impact on retrofitting work and could potentially enable both areas of work to be carried out at the same time.**

# LONDON ASSEMBLY



**Sian Berry AM**

**Chair of the Housing Committee**

**The Rt Hon Michael Gove MP**

Secretary of State for Levelling Up, Housing and Communities

(Sent by email)

**cc: The Rt Hon Greg Hands MP**

Minister for Energy, Clean Growth and Climate Change

**Helen Whately MP**

Exchequer Secretary to the Treasury

6 October 2021

Dear Secretary of State,

Congratulations on your appointment as Secretary of State for Levelling Up, Housing and Communities.

I look forward to engaging with you constructively over the coming months to ensure the housing needs of Londoners are being met, with an emphasis on affordability, increasing housing provision of all kinds, and increasing the number of zero carbon and carbon neutral homes across London.

To that end, I would be grateful if you would meet with me at your earliest convenience to discuss these issues as well as the Housing Committee's most recent investigation, which I will detail below.

On 20 July 2021, the Housing Committee held a meeting investigating what is needed to cut emissions from London's existing homes to achieve carbon neutrality. The Committee heard from a range of experts on the scale of the challenge, the barriers and the costs likely to be associated with

any major programme of retrofitting in London. We invited the following guests to our Committee meeting: Shirley Rodrigues (Deputy Mayor for Environment and Energy), James Hardy (Head of Energy for the GLA), Susan French (Chief Executive of Barnsbury Housing Association and Vice Chair of the g320), Councillor Adam Harrison (Cabinet member for a sustainable Camden in the London Borough of Camden) and Bradley Tully (Senior Public Affairs Officer from the Royal Institution of Chartered Surveyors). Our investigation focused specifically on funding, the skills gap and quality assurance.

As you know, retrofitting homes is vital to achieving the UK's environmental targets — London's 3.5 million homes account for one third of the city's greenhouse gas emissions alone.<sup>9</sup> There are a number of upcoming opportunities for the UK to show leadership on this front, with COP26 approaching, a multi-year Comprehensive Spending Review and the much-anticipated Planning Bill. I therefore want to use this opportunity to highlight key findings and recommendations from our investigation. Please refer to **Appendix A** of this letter for a full list of our recommendations.

### **Costs of retrofitting**

One of the most significant barriers to decarbonising the UK's housing stock is determining the exact costs of retrofitting work. Various external factors can influence the cost, including changes in energy efficiency policy, and the demand and supply of technology and labour. Special considerations and more complex work, which are more likely to be required in older homes, can also add to the costs.

The Department for Business, Energy and Industrial Strategy (BEIS) estimated in 2019 that across the UK, anywhere between £35 and £65 billion will be needed by 2035 to bring every home up to standard.<sup>10</sup> Regional variations such as higher wages in London and the South East mean that costs could be even higher in these areas. The Mayor's 1.5C Compatible Climate Action Plan highlights the actions needed to be taken for London to become carbon neutral by 2050.<sup>11</sup> At our Committee meeting in July, the Deputy Mayor for Environment and Energy, Shirley Rodrigues told us that London needs to spend £61 billion to tackle our infrastructure to achieve the actions in the Plan. This is because all of London's 3.5 million existing homes will need some form of retrofit. London also has a complicated system of housing infrastructure, consisting largely of flats, solid walls and conservation areas that make it difficult to retrofit.

We heard from experts at our meeting that funding spent in London does not match these challenges. The Deputy Mayor stated that London does not receive its fair share of Energy Company Obligation (ECO) funding. In fact, according to the Mayor, Londoners have paid £82.3 million annually to the ECO programme, while £27.3 million has been spent, a shortfall of £55 million every year.<sup>12</sup> Other guests highlighted the need for the Government to establish retrofitting as a national infrastructure priority. Guests also expressed uncertainty around what would replace existing funds,

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<sup>9</sup> [GLA, February 2020](#)

<sup>10</sup> [BEIS Committee, Energy efficiency: building towards net zero: Government Response to the Committee's Twenty-First Report of Session 2017–19, 2019](#)

<sup>11</sup> [Sadiq Khan, Zero carbon London: A 1.5°C compatible plan, December 2018](#)

<sup>12</sup> [Mayor's written evidence to the Environmental Audit Committee inquiry into energy efficiency of existing homes, July 2020](#)

namely the European Regional Development Fund and the European Social Fund under which London received €791 million in the last round.<sup>13</sup> It is our understanding that this funding will be replaced and at least matched by the Shared Prosperity Fund, but it is not yet clear what proportion of this London will receive.

In order to allow London to deliver retrofitting at the pace and scale to meet the UK's climate ambitions, the Housing Committee recommends:

- 6. London should get its fair share of all retrofit spending, particularly ECO funding, or sufficient powers to raise finance itself. The Government should also outline what proportion of the Shared Prosperity Fund London will receive and ensure that this, at the very least, matches what Londoners pay for energy.**

## **Funding**

Another key concern highlighted at our Committee meeting is the 'stop and start' nature of funding. Several experts expressed concern that intermittent funding streams such as the Green Homes Grant have caused significant issues for installers. Councillor Adam Harrison, Cabinet member for a sustainable Camden in the London Borough of Camden stated that contractors and potential providers had been 'shaken' by this lack of certainty and it had: "harmed confidence among the contractors who need to be investing in their own workforce, who need to be gaining the quality accreditations that are needed." The Deputy Mayor, Shirley Rodrigues contended that a more user-friendly scheme should be introduced, alongside a premium for contractors carrying out work in cities so they are not unfairly disadvantaged.

Presently, standards apply so that private landlords must enter a new tenancy agreement with minimum energy efficiency in place, unless exemptions apply. One exemption is the 'cost cap' which means that landlords are exempt from making energy efficiency improvements costing more than £3,500. To further incentivise homeowners, the Deputy Mayor informed the Committee that the Mayor supports the Government's proposals to increase the cost cap for private landlords to £10,000. This would be a better reflection of the costs required to retrofit homes in London. The Committee supports this increase and awaits the Government's response to the consultation on this matter.

The Housing Committee believes that improving access to funding, creating incentives and providing funding certainty are central to encouraging greater uptake of retrofitting opportunities. We therefore recommend:

- 7. The Government should consider implementing multi-year, user-friendly funding schemes. This would increase sector and homeowner confidence and give contractors and providers longer-term certainty on delivery of programmes.**
- 8. The Government should implement its proposal to raise the landlord cost cap to £10,000 to increase the extent of works private sector landlords are undertaking to meet mandatory minimum energy efficiency standards.**

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<sup>13</sup> [Question to the Mayor, 17 December 2014](#)

## Decent Homes Standard

Around 28 per cent of London's homes are privately rented, compared with 18 per cent across England, with around one in five of these below the Decent Homes Standard – higher than in any other tenure.<sup>14</sup> This tenure is also among the least energy efficient in England.<sup>15</sup> At our meeting, the Committee heard that the Decent Homes Standard does not currently mandate a net zero approach to homes. We welcome the commitment in the Government's Social Housing White Paper to review the Decent Homes Standard and consider how it can better support decarbonisation. To this end, we recommend that:

- 9. The new Decent Homes Standard should mandate minimum energy efficiency standards, with a view to achieving net zero emissions at least in line with the Government's 2050 target.**

## Cladding remediation

Four years on from the Grenfell Tower disaster, cladding remains a significant issue. As the process of cladding remediation is underway, the Committee heard how this programme provides an opportunity to carry out retrofitting alongside this work, particularly the installation of solar panels.

The housing challenges for local authorities are not insignificant: on top of remediation work, councils also have to ensure the delivery of affordable housing. Carrying out retrofitting is therefore an additional, and significant cost for local authorities, which can impact other activities from a funding and resource perspective. Providing retrofitting work alongside cladding remediation could be a way to reduce this cost burden. This will ensure that buildings are not only safe, but also sustainable in the longer-term. The Housing Committee therefore recommends:

- 10. The Government should ensure that cladding remediation does not negatively impact on retrofitting work and could potentially enable both areas of work to be carried out at the same time.**

Both Government and industry need to take bold and decisive action if the UK is to meet its climate ambitions. These ambitions need to be matched by adequate funding for a mass programme of retrofitting homes across the country. It is the Committee's hope that the recommendations outlined in this letter are taken forward, to ensure that the environment is placed at the heart of our housing, planning and construction industries nationwide. The Committee is also writing to the Mayor of London, Sadiq Khan, to share the Committee's findings and urge him to take on additional leadership in this area (please refer to **Appendix B** for a list of recommendations).

Since it is also crucial that the Government adopt a joined-up approach to delivering the decarbonisation of the UK's housing stock, I have also copied this letter to the new Minister for Energy, Clean Growth and Climate Change, Greg Hands MP and the new Exchequer Secretary to the Treasury, Helen Whately MP.

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<sup>14</sup> [GLA, Housing in London 2020](#),

<sup>15</sup> [BEIS, Improving the Energy Performance of Privately Rented Homes in England and Wales, 8 January 2021](#)

While I understand this will be a busy time for you as you settle into a new department, the Committee would welcome a response to our recommendations and would be grateful if this could be provided by 20 October 2021. I would also be grateful if you would meet with me at your earliest convenience to discuss the above issues.

I look forward to your response.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Sian Berry', with a stylized flourish at the end.

**Sian Berry AM**  
**Chair of the Housing Committee**

## Appendix A: London Assembly Housing Committee recommendations to the Government on retrofitting London's homes

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- 4. We recommend: a) that you inform the Committee of the outcome of your mapping exercise and commissioned review of planning issues with respect to retrofit and solar energy, b) that you advise whether there are any opportunities for you to use your planning powers to make it easier to secure consent for installation of solar panels across more areas of London and help Londoners to understand the rules governing installation of solar panels for listed buildings and conservation areas, and c) that this work results in more consistent conservation policies within boroughs to be as supportive as possible of retrofit and renewable energy.**
- 5. We recommend that you continue to lobby for ECO spending which better matches what Londoners pay for energy and push the Government to ensure that London receives fair financial support or sufficient powers to raise this finance itself.**
- 6. We recommend that you bring together private sector landlords and tenants to look at barriers to retrofit and the ways in which Government or local government action could overcome them.**