Responses to GMCA Consultation on
Draft GMWHSHF Wave 3 Scheme Guidance

1. There is no Grant Offer Letter (GOL). The relevant information will be included in the Grant Funding Agreement (GFA).	
Query	**Response**
Can GMCA clarify if the terms of reference within grant funding agreement will be reviewed annually to reflect the changes in scope or funding amounts or will stay the same for duration of the scheme?	A separate GFA will be issued for each phase. Due to the requirement to complete Retrofit Assessments and architype Retrofit Designs before making a Phase Request, there should not be any significant changes in scope or funding. It will be possible to replace homes included in a phase on a like-for-like basis, for example if a tenant refuses access. Alternatively, homes can be removed from the current phase and resubmitted in a future phase.
Noted. However, to mitigate any risk of delay in receiving the GFA and for the purposes of compliance and governance – a GOL would be beneficial for the purposes of business planning and any guarantee that we would need to provide to our funders.	GMCA intends to issue a GFA upon approval of each phase which can be provided to funders.

2. As GMCA will receive its WH:SHF funding allocation from Government annually, we can only make annual awards. Therefore, it is not possible to award funding for more than one financial year at a time.	
Query	**Response**
Can GMCA clarify if Housing Association would be allowed to make changes to initial high-level programme on annual basis based on more realistic programme on year-by-year basis. There has been provision for this before, but it could do with a little more flexibility. Statutory bodies and energy infrastructure owner barriers can mean that some addresses need to be replaced during the programme.	Yes, the initial high-level programme can be updated every time a Phase Request is submitted. Homes in a phase can be replaced on a like-for-like basis. Alternatively, homes can be removed from the current phase and resubmitted in a future phase.

The risk of not guaranteeing funding throughout the duration of the WH-SHF scheme (3 years) will potentially impact: 1. Difficulty of securing a 3-year contractor with a number of contractors to enable delivery of the works. 2. Not being able to guarantee or confirm actual costs to the contractor(s). 3. Risk of not securing VFM and increased costs through by not being able to confirm or guarantee volume delivery of measures. 4. Inability to maintain traction on delivery of works. 5. A&A support costs – anticipate it will be difficult to maintain temporary staff (e.g. WH-SHF project officers) with 1+1+1-year contracts 6. Risk of ‘assumed’ spend within the 30 year business plan. 7. Risk to strategic planning and limited flexibility to apportion properties across the 3 years. However, there are also benefits, one being that organisations will be able to amend programmes following retrofit assessments and accelerate works using internal delivery methods, without any impact on submitting change requests.	Noted. However, GMCA cannot commit to providing three years of funding to housing providers, as it is only receiving funding from the Government annually.
Can you also confirm the number of bid windows in each year.	Up to three.
Retrofit of high rise block may not be possible to complete within a 12 month period as all flats and communal area retrofit must complete before lodgements can be made. Blocks starting in May 2025 are projected to complete in 2026/27. Is there any way to accommodate high rise retrofit in the funding allocation? The national programme seems to allow a minimum 1/3 of grant must be spent each FY, why is the GM programme not	GMCA raised this with DESNZ and received confirmation that the delivery of a phase can continue into the next financial year if it cannot be completed in the current one. However, delivery cannot extend beyond 31 March 2028, as that is when GMCA’s delivery targets must be met.

allowing this flexibility to carry forward unspent grant into the next FY up to 31 March 28? This is not a 3-year delivery programme, as schemes have to be completed within the financial year of grant approval, this is 3 consecutive annual schemes – is the national programme being delivered in this way? Delivering some schemes, such as tower blocks will be extremely challenging within one FY.	
1. This is a shame as one of the main issues we have experienced with the national scheme is the inability to move grant between FYs when needed. This coupled with the inability to spend co funding the following FY leaves us with less flexibility than we have had in previous waves, should we run into delivery issues. 2. Clarification: If due to delivery delays we lose grant associated with some properties, are we able to include these properties to subsequent phase applications the following FY?	1. GMCA raised this with DESNZ and received confirmation that the delivery of a phase can continue into the next financial year if it cannot be completed in the current one. However, delivery cannot extend beyond 31 March 2028, as that is when GMCA's delivery targets must be met. 2. Yes, homes which drop out of a phase due to delivery delays can be re-submitted in a future phase if delivery issues have been resolved.
We welcome the ongoing regular bidding windows as it allows time to prepare and submit well considered and deliverable bids, the annual awards will make it more difficult to implement a comprehensive and guaranteed forward plan of works. We are aware that the national fund is significantly oversubscribed, so it is reasonable to assume that the GMCA one will follow the same pattern. How will this be managed, and what can we expect in terms of grant funding per property and schemes (e.g. will the amount of grant funding be reduced per property to maximise the numbers, or will a smaller number of schemes be approved)?	GMCA raised this with DESNZ and received confirmation that the delivery of a phase can continue into the next financial year if it cannot be completed in the current one. However, delivery cannot extend beyond 31 March 2028, as that is when GMCA's delivery targets must be met. If GMCA's funding is over-subscribed, priority will be given to fabric and low carbon heating projects that are fully retrofit assessed, designed, procured, and ready to commence as soon as the GFA is executed.

Some concern with this annual allocation model – we can appreciate the reasons why this has been proposed as it will likely reduce the inaccurate programme reporting / delay to programmes / inertia in some programmes. However, short term time windows and shorter projects will reduce the ability for quality partnering arrangements, lead to more procurement activities, likely increase cost of the work, reduce social value gains and employment opportunities e.g. apprentices and make our resource planning more difficult. Can this proposal be reviewed and amended so that longer term arrangements can be agreed based on the individual merits of the projects proposed and our past positive performance in delivering works over longer programme periods.	GMCA cannot commit to providing three years of funding to housing providers, as it is only receiving funding from the Government annually. GMCA raised this with DESNZ and received confirmation that the delivery of a phase can continue into the next financial year if it cannot be completed in the current one. However, delivery cannot extend beyond 31 March 2028, as that is when GMCA's delivery targets must be met.

3. As all homes must be completed by the end of each financial year, it is not possible to allow an additional six months to spend co-funding.

Query	Response
Government funded schemes, retrofit projects tend to be complex and sometimes the extension is necessary due to unforeseeable circumstances such as: delays with stat bodies and energy infrastructure owners. Would GMCA consider allowing the extension in situations outside client control? Failing this, could works be deemed complete in the absence of certification which can sometimes take time to obtain.	GMCA raised this with DESNZ and received confirmation that the delivery of a phase can continue into the next financial year if it cannot be completed in the current one. However, delivery cannot extend beyond 31 March 2028, as that is when GMCA's delivery targets must be met.
Observation would be, providing GFA's are provided in a timely manner, this will allow sufficient time to carry out the necessary contractor procurement activities, to ensure we have contractors able to delivery works immediately from 1 April 2025.	Noted. GFAs will be issued as soon as possible after grant award.

It must also be noted that homes must have a retrofit assessment to confirm the type of measure and for those measures to be procured where e.g. solar PV is recommended, planning permission, etc. – all of which need 'lead in' times.	
From our experience with the Government funded schemes, retrofit projects tend to be complex and sometimes the extension is necessary due to unforeseeable circumstances such as: delays with the supply chain partners or bad weather conditions. Would GMCA consider allowing the extension in situations outside client control, and follow similar process to DESNZ change request protocol?	GMCA raised this with DESNZ and received confirmation that the delivery of a phase can continue into the next financial year if it cannot be completed in the current one. However, delivery cannot extend beyond 31 March 2028, as that is when GMCA's delivery targets must be met.
If we have multi bids in one year, then I think that the end date for spend on each 'phase or bid' need to be one year from the date of award : otherwise we may have difficulties in bids in the second half of each year	GMCA raised this with DESNZ and received confirmation that the delivery of a phase can continue into the next financial year if it cannot be completed in the current one. However, delivery cannot extend beyond 31 March 2028, as that is when GMCA's delivery targets must be met.
How would this work if a project is started for example in November?	GMCA raised this with DESNZ and received confirmation that the delivery of a phase can continue into the next financial year if it cannot be completed in the current one. However, delivery cannot extend beyond 31 March 2028, as that is when GMCA's delivery targets must be met.
We acknowledge and understand GMCA's position and challenges arising from challenges with delivering the programme spend in previous SHDF rounds, and therefore certain aspects of the approach that are proposed to safeguard spend to maximise delivery and use of grant. However, we feel that the requirement for delivery within each financial year may present a challenge and constrain the ability to run a continual programme	GMCA raised this with DESNZ and received confirmation that the delivery of a phase can continue into the next financial year if it cannot be completed in the current one. However, delivery cannot extend beyond 31 March 2028, as that is when GMCA's delivery targets must be met.

which ensures continuity for the supply chain.	
In conjunction with the entry requirements to the scheme this is likely to create issues of deliverability with all partners trying to deliver their high cost and complicated schemes in the first part of each year, is the supply chain mature enough to allow this?	GMCA raised this with DESNZ and received confirmation that the delivery of a phase can continue into the next financial year if it cannot be completed in the current one. However, delivery cannot extend beyond 31 March 2028, as that is when GMCA's delivery targets must be met.
If we have multi bids in one year, then I think that the end date for spend on each 'phase or bid' need to be one year from the date of award : otherwise we may have difficulties in bids in the second half of each year	GMCA raised this with DESNZ and received confirmation that the delivery of a phase can continue into the next financial year if it cannot be completed in the current one. However, delivery cannot extend beyond 31 March 2028, as that is when GMCA's delivery targets must be met.

4. Applicants must be supporters of the GMCA Good Landlord Charter.	
Query	**Response**
Generally, all members are in agreement with this.	Noted.
Although the Charter is a voluntary standard implemented in January 2024, it ensures that landlords meet the legal minimum standards of rent and are able to support and commit to higher standards than currently required by law. We will review this standard to ensure that we are able to commit and confirm that we have the required characteristics in place: • Affordable – e.g. properties meet EPC C as a minimum • Inclusive – e.g. make or facilitate reasonable adaptations to properties, where needed • Private and secure – e.g. tenants able to make reasonable changes to their home	Applicants need to be supporters of the GMCA Good Landlord Charter, so must be working towards meeting its requirements rather than being fully compliant with all of them.

• Responsive – e.g. published, timely target response times • Safe and decent – e.g. any work/repairs done by a qualified or competent tradesperson • Supportive – e.g. a commitment to refer tenants at risk of homelessness to council • Well managed – e.g. landlord must be able to demonstrate accreditation or training	
How would we go about subscribing to this? I think a meeting about implications and process would be good for everyone.	See Good Landlord Charter for more information. Meetings on this will be arranged in due course.

5. There is no Strategic Partnership route or Consortium Application option.	
Query	**Response**
This will be better for larger providers but could deter smaller entities.	Noted. There is no minimum application size for small social housing landlords (defined for this purpose as those who own or manage fewer than 1,000 homes). Therefore, they can apply for a small number of homes and GMCA will provide the necessary support to help build their expertise and confidence.
Initial thoughts are that there could be missed opportunities for partnership or collaboration where organisations operative within the same localities, or maximising local contractors, social value, local employment and training opportunities.	GMCA will provide opportunities for partnership and collaboration through the continuation of the existing successful approach for its Wave 2.1 Consortium. In addition, the Net Zero Housing Retrofit Framework Agreement will provide opportunities for maximising local contractors, social value, local employment, and training.
We only own homes in Greater Manchester, so this does not present any challenges for us. The only concern we have is about the arrangements in place to ensure that the total sum of homes which are the subject of applications through the GMCA pot (as	GMCA is being awarded a proportional allocation based on the number of social homes with an EPC of band D or below in Greater Manchester compared to England.

landlords who own homes outside of Greater Manchester but have the majority of their homes within GM may be bidding for non-GM homes through the GMCA route) receive a fair allocation of the overall national funding pot. This is particularly important as we understand the overall grant funding amount available nationally to be vastly oversubscribed.	GMCA expects to fund only a small number of homes outside Greater Manchester and will try to balance this with a similar number of homes in Greater Manchester being funded from the national pot.

6. Retrofit Assessments and architype Retrofit Designs are required for all homes included in an application.

Query	Response
Would request that 'old PAS' RAs are accepted with application and that if necessary new PAS RAs will subsequently be completed.	PAS2035:2019 Retrofit Assessments will be accepted for the bid, but they will need to be upgraded to PAS2035:2023 prior to each project being created in the TrustMark Retrofit Portal.
These are expensive and now the sector lacks the skills and capacity to deliver these at scale, particularly if volumes are high in a particular geography. The timescales won't help with this. The requirement can lead to taking a financial risk for completing costly assessment without guarantee of the funding allocation in a long term.	As all social homes must meet the Government's target of EPC band C by 2030, housing providers will need to obtain Retrofit Assessments for them anyway.
Acknowledged, however will need clarity if retrofit assessments (RA's) and designs (RD's) will be required 'annually', as per annual funding allocation against the proposed properties to be delivered on an annual basis. If RA's and RD's are required at point of application, this will potentially limit the volume of homes that we intend to deliver. There is also the impact that new SAP will have on existing RA's.	Retrofit Assessments and architype Retrofit Designs are required for all homes included in a Phase Request. EPC Accreditation companies have indicated that they will continue allowing the generation of RdSAP 2012 post-retrofit Energy Performance Reports (EPRs) to enable retrofits that started in RdSAP 2012 to be completed in RdSAP 2012, where the pre-retrofit assessment took place before the "go-live" date of RdSAP 10. In these situations, GMCA 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.
The average costs for RA&D are over £1000. The requirement can lead to taking a financial risk for completing costly assessment without guarantee of the funding allocation in a long term. Timescales to complete the works are challenging, which means that the actual number of surveys and assessments will increase to allow for customer refusals and drop offs. From our perspective, it will be challenging to complete required RA&D in one month, considering that there is still a gap on the market for qualified retrofit assessors.	As all social homes must meet the Government's target of EPC band C by 2030, housing providers will need to obtain Retrofit Assessments for them anyway. GMCA raised this with DESNZ and received confirmation that the delivery of a phase can continue into the next financial year if it cannot be completed in the current one. However, delivery cannot extend beyond 31 March 2028, as that is when GMCA's delivery targets must be met.
Will the overwhelming majority of Retrofit Assessments be sufficient? On occasion access problems can mean one or two are missing whilst ongoing access arrangements are made. As these assessments will be carried out prior to application, can the costs still be included as part of A&A?	Retrofit Assessments are required for all homes included in a Phase Request. If this is not possible for a few homes due to access problems, then a Retrofit Assessment for a similar property can be used to determine the measures required. GMCA will be providing a fixed A&A grant calculated at 10% of the capital grant. This can be used for any A&A costs.
I understand this ask is linked to the inability to move grant and co funding between FYs and GMCA wanting to be confident RPs are ready to deliver at grant award stage, however, it does mean RPs must work at risk to complete the RA/RDs, and due to the timing has slowed our ability to get on site as we don't have budget to complete these assessments prior to April 2025. The impact of this due to the inability to move grant funding between years means that we may struggle to deliver the number of homes we wanted to in 25/26 and will have to push the majority to 26/27. Finally, under retrofit at scale in the PAS2035/23 it states that:	A Retrofit Assessment for each architype can be accepted if the housing provider is confident that the measures and costs will be the same for all homes of each architype. If this is found to be not the case, then homes in a phase can be replaced on a like-for-like basis. Alternatively, homes can be removed from the current phase and resubmitted in a future phase. GMCA has produced guidance on how Permitted Development Rights for EWI are being interpreted by each Local Planning Authority in Greater Manchester. Therefore, Planning Permission is only required where

"Assessments, improvement options evaluation and medium-term improvement plans can be focused on dwelling types, rather than on individual dwellings, in order to identify generic solutions and economies of scale. This allows retrofit design based on dwelling types to commence before all assessments are complete. Improvement options evaluation and medium-term improvement plans for dwelling types can be modified for individual dwellings, because very few homes are exactly the same, even those of superficially similar appearance." Could an option where we complete RA and designs to dwelling types / architypes only prior to bid be considered, rather than RAs for every property? Separate point - has any consideration been given to planning as most of our issues and need for changes have stemmed from planning departments not signing off on EWI rather than having a lack of info on our proposed properties. Appreciate this won't be the same for all RPs.	Permitted Development Rights cannot be complied with.
The requirement for Retrofit Assessments and architype Retrofit Designs for all homes included in an application represents a significant up front investment, and given the likely over-subscription to the fund may incur wasted costs if the scheme cannot proceed. We request that GMCA consider a more flexible approach, with a reduced requirement for schemes which have a lower cost per property and are for straightforward works.	As all social homes must meet the Government's target of EPC band C by 2030, housing providers will need to obtain Retrofit Assessments for them anyway. A Retrofit Assessment for each architype can be accepted if the housing provider is confident that the measures and costs will be the same for all homes of each architype. If this is found to be not the case, then homes in a phase can be replaced on a like-for-like basis. Alternatively, homes can be removed from the current phase and resubmitted in a future phase.

For those with pepper-potted stock and so few common architypes this will create issues, as for these properties both will be required before an application is made. It is likely to impact delivery, making a 30% spend each year difficult to achieve as delivery will be pushed back into later years.	Noted. GMCA appreciates that housing providers with pepper-potted stock may need longer to prepare their bid and, therefore, apply in a later financial year.

7. The low carbon heating cost cap uplift can be used for on gas grid as well as off gas grid homes. Therefore, there is no need for the separate low carbon heating incentive for homes on the gas grid. However, a fabric fist approach is required to ensure that energy bills do not increase.	
Query	**Response**
We would strongly prefer that the on-gas element is retained as a ring-fenced fund. The £20k grant will allow us to deliver projects that there will be no internal appetite for within the organisation due to the cost per property of technologies such as shared ground loops. The availability of £20k per property will act as a catalyst / kickstart to encourage us to start to adopt these technologies as an introduction to mainstreaming them across our portfolio. This is particularly pertinent due to the oncoming new heat network regs which will affect all providers operating communal heating schemes. Shared ground loop could potentially take us out of scope of the new regulations which adds an extra argument for making technologies such as this more accessible for social landlords.	It is not possible to retain the £20k low carbon heating incentive for up to 10% of homes if the £7.5k low carbon heating cost cap uplift is made available to on gas grid homes. Given the choice between the two options, most housing providers have said they prefer the latter.
It is acknowledged that a fabric first approach is taken. We will, as part of the planning process, look at maximising measures to ensure customers fuel bills do not rise and consider options such as solar thermal, where practicable and affordable.	Solar thermal is not recommended, as experience from housing providers has shown that it is not very effective for most of the year in North West England.
This is understandable, however the £20k made the work much more	The £20k low carbon heating incentive was only available for up to 10% of

attractive, as the LCH was fully funded and would cover the cost of the installation. Our experience has ASHP installs costing between £13-£17k.	homes, whereas the £7.5k low carbon heating cost cap uplift covers 50% of the cost of all ASHP installations costing up to £15k.

8. High Heat Retention Storage Heaters will not be funded unless all other low carbon heating options are shown to be unfeasible.	
Query	**Response**
Noted. We will, through RA and RD, always consider High Heat Retention Storage Heaters (HHRSH) systems as a final option and adopt a fabric first approach.	This is the recommended approach.
I note that you have specially excluded High Heat Retention Storage Heaters from the bid : What if you have a scheme where this is the only practical solution at this time due to limiting factors.	High Heat Retention Storage Heaters are not excluded but should be used as a last resort if all other low carbon heating options are shown to be unfeasible.
Can you clarify what the low carbon heating options would be and what would be classed as unfeasible? For example, where we have attempted to install ASHP in flats we have been required to complete a full planning application which has added costs to the project as well as time with some decisions taking over 6 months to get back and we have some which have had planning refused. Would we be able to class this as unfeasible?	Low carbon heating options include: • Air Source Heat Pumps • Exhaust Heat Pumps • Ground Source Heat Pumps • Water Source Heat Pumps • District Heating. An option would be unfeasible if, for example, it is technically not possible to install, too costly, too disruptive, or where Planning Permission has been refused.

9. Hybrid heating systems and solid biomass are not eligible measures.	
Query	**Response**
Initial observation is, with the progress in technology, why hybrid heating systems are not being considered (e.g. an air source heating pump with an existing boiler), where a standard heat pump may not be suitable for the customer in examples where as home	GMCA aims to remove fossil fuel heating wherever possible. This will help to minimise carbon emissions, improve air quality, and enable gas meters to be removed thereby saving tenants the annual standing charge.

has a high heat demand (and where insulation has been installed).	

10. The minimum number of homes in an application has been reduced from 100 to 50.	
Query	**Response**
Please can you clarify if this is per phase or whole 3 year application? If per phase, due to issues mentioned above some RPs may struggle to complete 50 properties in the first FY. If RA/RDs start in April with new budgets, we believe the 3rd phase application is the earliest we could bid for funding, meaning project start in Oct. This gives 5 winter months for us to complete work, for projects focussing on solid wall properties and EWI getting 50 done in this time will be very hard.	The minimum of 50 homes is per phase. GMCA raised this with DESNZ and received confirmation that the delivery of a phase can continue into the next financial year if it cannot be completed in the current one. However, delivery cannot extend beyond 31 March 2028, as that is when GMCA's delivery targets must be met.
Ok with this and likely helpful if smaller short-term projects need to be identified and programmed for delivery in smaller time windows.	Noted.
Would this be 50 properties per application or per year or for the whole project? We feel it would be better to have a minimum like this if the properties are spread out but also an option to complete the application using a smaller number of properties where they are on a specific street, area, or individual block(s) for example.	The minimum of 50 homes is per phase.

11. For high-rise buildings, Building Safety Regulator consent must be obtained prior to application.	
Query	**Response**
Current timescales with the BSR make this unworkable.	Noted. However, it is expected BSR timescales will reduce.

Acknowledged, we will follow Building Safety Regulations to ensure compliance for any properties we may consider that are above 6 storeys.	Noted.
The process for obtaining the consent from Building Safety Regulator can take up to 6 months, which account for half of a time to complete the project. Would GMCA consider removing this condition or allow for an extension.	No, as this can be overcome by obtaining BSR approval in year 1 and then applying for funding in year 2.
There is a lengthy process involved with BSR in terms of approval, having this obstacle may well force not submitting properties in high rise buildings.	Noted. However, this can be overcome by obtaining BSR approval in year 1 and then applying for funding in year 2.
Although won't affect us, good idea.	Noted.
We understand why this is being required, as the timescales for receiving consent are currently unknown, but are likely to be lengthy.	Noted.
No view, you also need to consider and formalise payment terms for high rise blocks where payment on completion is for the whole project rather than individual properties.	Grant payment can be requested for completed flats and does not need to wait for the whole block to be completed.

12. The A&A grant to be no more than 10% of the capital grant.	
Query	**Response**
The PAS2035 compliance costs remain high, together with the high demand for retrofit assessors and coordinators. The cap of 10% may deter applications or will mean other capital work budget has to be used.	Noted. However, 5% is required by GMCA to cover its staffing and admin costs, and the 10% being provided to housing providers is higher than the 7% provided in GMCA's Wave 2.1 bid.
Noted. However, will the 10% be based on the annual grant or the combined 3-year annual grant?	A&A grant will be paid at a fixed 10% of the capital grant for each home completed.
The PAS2035 compliance costs remain high, together with the high demand for retrofit assessors and coordinators. The dropdown in funded A&A costs will have an impact on overall project costs and might result in organisations cutting on	Noted. However, 5% is required by GMCA to cover its staffing and admin costs, and the 10% being provided to housing providers is higher than the 7% provided in GMCA's Wave 2.1 bid.

capital expenditure to cover for A&A costs.	
I note the drop in A&A to 10%, can you confirm that failed CWI needs to come out of here and not capital - this could be tight on some programmes, will the A&A be looked at over the full three year period so that this can be achieved over a mix of programmes that will not have this same difficulty?	CWI extraction must be funded from A&A. A&A grant will be paid at a fixed 10% of the capital grant for each home completed.
Based on the level of A&A expenditure experienced in Wave 2.1, was the aim not to secure A&A at 15% of capital grant?	A&A grant has been secured at 15% of the capital grant. However, 5% is required by GMCA to cover its staffing and admin costs, and 10% is being provided to Housing Providers.
Why is this lower than the national guidance? This reduction along with national cost cap reduction from wave 2 levels (appreciate that's not GMCA decision) makes delivering retrofit even harder for RPs.	The total A&A is the same as the national guidance. However, 5% is required by GMCA to cover its staffing and admin costs, and 10% is being provided to Housing Providers.
See this as a positive as it's an increase on previous Waves. However, some concern as in reality our costs A&A related activities will be higher than 10%, especially if the overall programme needs to be broken down into smaller annual tranches and then further 1/3rd delivery groupings.	Noted.

13. Application support and technical assistance will be provided by GMCA rather than RISE.

Query	Response
Acknowledged. To support the delivery of WH-SHF, further process, procedure and access to this technical support and expertise is critical, including detail of what 'technical expertise' would be provided. What would also be beneficial is FAQ's that organisations can access.	Noted. Housing Providers will be invited to fortnightly online meetings where external speakers will deliver technical and product information. FAQs will be published at Warm Homes: Social Housing Fund (WH:SHF)

What will this look like? The support we have received for Wave 2 has been really good so we would want to continue that way.	Housing Providers who are currently members of the GMCA Wave 2.1 Consortium will see their existing support continuing. More in depth support will be provided to Housing Providers who have not been part of the GMCA Wave 1 or Wave 2.1 Consortia to bring them up to speed. Housing Providers will be invited to fortnightly online meetings where external speakers will deliver technical and product information.
Good idea and look forward to working with you.	Noted.

14. Grant funding will be paid quarterly for homes completed and lodged with TrustMark in the previous quarter.	
Query	**Response**
Largely in agreement however this may hamper some providers who don't have the financial resource to accommodate this	Noted.
Acknowledged. However, should there be a delay from install to Trustmark lodgement, would this impact grant funding draw down in a particular 'quarter'.	Yes, as TrustMark lodgements are required to release funding.

15. Any other comments.	
Query	**Response**
Realise difficult to manage but some mechanism to allow blending of applications through the 3 annual opportunities to provide an agreed forecast grant average and percentage target for low carbon heating.	This is not possible, as GMCA is unable to commit to providing funding in future phases or financial years.
The timescales between each phase submission and project delivery are challenging to meet. We believe that	GMCA raised this with DESNZ and received confirmation that the delivery of a phase can continue into the next

without a flexibility and adaptation to the challenges that housing providers are facing, the scheme can be undersubscribed and fail its intended purpose.	financial year if it cannot be completed in the current one. However, delivery cannot extend beyond 31 March 2028, as that is when GMCA's delivery targets must be met.
I'm pleased also to see that the possibilities of infill has been improved under section 2.4.1 : ie a max (not a target) of 10% can be in a bid and that the guidance shows this includes terrace homes. Is this a softening of the rules and is this an opportunity to go back with some of our wave 2.1 properties that are house in a terrace?	GMCA expects that applications that do contain homes at or above EPC band C will keep the number of such homes as low as possible, which is why the 10% is a limit, not a target. There is no softening of the rules for fabric measures, as the policy is limited to situations in which social homes below EPC band C would be adversely affected without it, for example, cases where these social homes would not be able to meet EPC band C, or where works must be undertaken on a whole block for planning or logistical reasons. There is a softening of the rules for low carbon heating measures only, as they do not have to be installed on an infill basis. However, this policy cannot be used to go back and fund measures to homes that were included in Wave 2.1.
Can the decision to allow low carbon heating to be eligible when revisiting homes funded under wave 1 be extended to include revisiting homes under wave 2 where the wave 2 funding has only been applied to fabric measures? There doesn't appear to be any flexibility on the cost caps for properties with low ECP ratings, instead the focus is to achieve the highest EPC within the cost cap. This feels like the priority is to keep costs low rather than achieve the desired EPC C rating.	No, as it is not possible to provide any Wave 3 funding to homes that were included in Wave 2.1. Cost caps can be averaged across all homes included in a phase to provide a higher amount of grant funding for homes with low EPC ratings.
Can the 10% band C properties be averaged across phases, i.e. if in phase 1 we completed 100 band D or below properties, could we in theory, in phase	Yes, this is possible. However, you will not be able to go above 10% in phase 1 with a promise to bring the percentage

2 complete 10 Band C properties, as over the 2 phases only 10% of properties delivered are band C? This would help with delivery, meaning that each phase.	down in phase 2, as future funding cannot be guaranteed.
We would appreciate some additional clarity on para 2.3. If we have retrofit assessments using RDSAP2012, is it a requirement that work has to have commenced (but not completed) before the change to RdSAP 10? I.e. if we commission 100 Retrofit Assessments using RdSAP2012 and then work up the proposals but don't achieve a site start before RdSAP 10 is implemented, can we still use those assessments, or do we need to have new ones done? If we have to have new assessments using the new reports, this may require redesigns and further cost after the project has been approved. It may also lead to abortive costs in the project planning and application phases, and may also have adverse impacts on application timescales and in turn delivery.	Retrofits completed prior to the RdSAP10 go-live date will use the current approach and be evidenced wholly by RdSAP2012 assessments. Retrofits that straddle the RdSAP10 go-live date will be able to use a RdSAP2012 post-retrofit assessment, provided a pre-retrofit assessment has been completed in RdSAP2012 prior to the RdSAP10 go-live date. Retrofits started after the RdSAP10 go-live date, will be evidenced wholly by RdSAP10. As these transitional arrangements are being implemented by TrustMark on a national basis, GMCA does not have any discretion in the matter.
The removal of the higher cost grant (£20,000) will impact delivery of the higher cost options of EWI. This has significantly altered our delivery plans and the deployment of ASHP into suitable stock.	It is not possible to retain the £20k low carbon heating incentive for up to 10% of homes if the £7.5k low carbon heating cost cap uplift is made available to on gas grid homes. Given the choice between the two options, most housing providers have said they prefer the latter.

Responses to GMCA Consultation on
Draft GMWHSHF Wave 3 Scheme Application Form

1. Guidance Section	
Query	**Response**
No queries received.	

2. Declarations Section	
Query	**Response**
The Applicant acknowledges that, if successful, it will be expected to deliver the project as outlined in this application – this assumes that there will be no changes to measures or property list, which was agreed could be amended where needed?	Due to the requirement to complete Retrofit Assessments and architype Retrofit Designs before making a Phase Request, there should be no significant changes to measures or properties. It will be possible to replace homes included in a phase on a like-for-like basis, for example if a tenant refuses access. Alternatively, homes can be removed from the current phase and resubmitted in a future phase.

3. Section 1 - Applicant Details	
Query	**Response**
No queries received.	

4. Section 2 - Strategic Fit	
Query	**Response**
"Applicants are not expected to know exactly which homes will be upgraded" this contradicts as per above.	Noted. This text is from the national guidance and was missed from the amendments. It has been corrected in the final version.

5. Section 3 - Delivery Forecast	
Query	**Response**
I got confirmation that we could update the number of properties accessing the low carbon heating cost later on – this suggest we should have numbers ready now?	The numbers in Section 3 are forecasts to help us assess the likely demand for future funding. The actual numbers you are bidding for need to be included in the Section 7 Phase Request.
We will not be able to fit our high rise scheme within the delivery timeframes indicated. It would commence 2025/26 and complete 2026/27	GMCA raised this with DESNZ and received confirmation that the delivery of a phase can continue into the next financial year if it cannot be completed in the current one. However, delivery cannot extend beyond 31 March 2028, as that is when GMCA's delivery targets must be met.
Just to note, no information / section for heat networks.	Please include under Low Carbon Heating (LCH).

6. Section 4 - Commercial Assurance	
Query	**Response**
In some circumstances we may have been unlikely to have appointed suppliers at bidding stage	When completing the table, if new procurements are required and these are not known at the time of application, Applicants should provide an indication of planned contracts to be placed to deliver the grant funding (e.g. by value, type). If you only know the areas/types of suppliers you will need but don't know who these suppliers will be, please write N/A in the supplier name column. Details not known at the time of application should be itemised in the risk and issues register, along with planned actions and milestone dates for resolution in the project plan.

7. Section 5i - Delivery Assurance	
Query	**Response**
We are holding off converting existing PAS 2019 retrofit assessments into 2023 versions, or conducting new 2023 assessments until the new RdSAP software, which the 2023 PAS refers to, is available. This is to reduce the risk of further changes leading to additional visits, tests or data being required. In addition, for the high rise we were hoping to secure funding for 2 blocks to start in 25/26 and complete in 2026/27.	Retrofit Assessors should collect the survey information required to convert PAS2035:2019 Retrofit Assessments to PAS 2035:2023 so that it becomes a relatively quick desktop exercise. GMCA raised this with DESNZ and received confirmation that the delivery of a phase can continue into the next financial year if it cannot be completed in the current one. However, delivery cannot extend beyond 31 March 2028, as that is when GMCA's delivery targets must be met.

8. Section 5ii - Evaluation	
Query	**Response**
No queries received.	

9. Section 6 - Forecasts	
Query	**Response**
We are not yet in a position to project forward these plans. A detailed stock condition survey is underway along with a review of the Housing Revenue Account to understand the level of funding available but a comprehensive plan is not yet available for sharing	Please complete the forecasts the best you can using the information you hold. They can be updated at each Phase Request to reflect any new information you have received.
Needs change, forecast should be split into phases due to first year time provided to complete retrofit assessments.	The first three financial years have been split into three phases (P1, P2, and P3).

10. Section 7 - Phase Request	
Query	**Response**
Needs change, will require extra columns for Retrofit / Co-ordination Assessment fees. There are columns in this such as the 'Year Built', 'Retrofit Design', 'Retrofit Assessment', 'Pre Works EPC Score' that do not have the correct drop down list to input the data that is being asked.	Column for Retrofit Assessment / Co-ordination Fees added in the final version. Drop down lists corrected in the final version.

11. How would you feel about being asked to submit the application form in February 2025, even if you do not want to submit a Phase Request at this time? This would help us to understand the likely demand for funding in each financial year. You would then be able to update your forecasts at each Phase Request application. This would not preclude you from submitting the application in later windows if you are unable to submit it in February 2025.	
Query	**Response**
I feel like this would bring changes later on once the phase request is submitted as people are unlikely to have all information ready at this time but should do at the time of submitting the phase request.	Please complete the forecasts the best you can using the information you hold. They can be updated at each Phase Request to reflect any new information you have received.
We are not able to share plans beyond the project identified for 25/26 start and 26/27 completion.	Noted.
Yes, we would prefer this.	Noted.
We wouldn't be in a position to provide accurate information by February 2025.	Please complete the forecasts the best you can using the information you hold. They can be updated at each Phase Request to reflect any new information you have received.

12. Any other comments?	
Query	**Response**
No comments received.	