

Housing Decarbonisation Strategy

July 2025





Decarbonisation Strategy

As the largest Local Authority Registered Provider of social housing in Suffolk, with over 7,900 homes, Ipswich Borough Council holds a significant responsibility to ensure that its housing stock remains safe, energy-efficient, and of high quality. The Council is committed to this mission through its Corporate Strategy 2023, Proud of Ipswich, which outlines the aim to take bold, practical action on the climate emergency and achieve carbon neutrality by 2030. This commitment is further supported by the Council's Asset Strategy 2024-2030, which specifically focuses on social housing and the goal of achieving an Energy Performance Certificate (EPC) rating of C by 2030, where feasible, and creating a clear pathway toward net-zero emissions by 2050.

In alignment with the UK Government's commitment to enhancing energy efficiency in social housing, this Decarbonisation Strategy details the necessary steps to reach an EPC rating of C across the Council's social housing stock by 2030. This strategy integrates retrofit measures with ongoing investment programmes, such as planned maintenance and capital improvement works, ensuring a comprehensive, cost-effective, and sustainable approach that avoids future inefficiencies and unnecessary costs - taking a "no regrets" approach to long-term impact.

The strategy also adheres to the Regulator for Social Housing's Consumer Standards, ensuring that all actions contribute to providing safe, high-quality, and energy-efficient homes. Achieving these standards is crucial to the Council's ongoing obligation to deliver housing that not only meets decency requirements but also prioritises the health, safety, and well-being of its tenants.



OUR CHALLENGES

One of the most significant challenges we face is decarbonising our homes to enhance their energy efficiency. This includes installing renewable energy heating systems, improving thermal insulation, and upgrading ventilation to reduce carbon emissions and energy consumption. This strategy, covering the period from 2024 to 2030, will guide the delivery of the comprehensive programmes necessary to ensure our homes meet the government's targets for carbon emissions and energy usage. Our goal is to achieve an Energy Performance Certificate (EPC) rating of C for all properties by 2030 and to become 'net zero carbon' by 2050.

Based on data from sample properties and archetype modelling, the estimated cost for Ipswich Borough Council to upgrade all homes to an EPC C rating by 2030 is approximately £49.5 million. This estimate accounts for targeted retrofit measures across various property archetypes, prioritising cost-effective, "least regrets" interventions that comply with PAS 2035 and the Decent Homes Standard.

With an aging stock that have structural limitations, retrofitting is a significant challenge, particularly as each individual home will require a targeted approach. In addition, with the Government's targets applying to every Registered Provider, high demand for low-carbon materials is leading to shortages and higher costs. A shortage of skilled and qualified tradesmen also presents a challenge, all of which are also pushing costs higher.

These challenges are set against a cost-of-living crisis, which is creating difficult conditions for our tenants as we try to protect them from rising costs, by lowering the demand for energy consumption needed to heat and power our homes.

OUR OBJECTIVES

With these challenges in mind, the Council's key objectives are as follows:

- 1. Achieve EPC C by 2030:** Bring all homes up to a minimum Energy Performance Certificate (EPC) level C rating by 2030.
- 2. No Regrets Approach:** Implement measures that do not preclude further upgrades in future carbon reduction targets as we head towards net-zero by 2050.
- 3. Synergy with Investment Programmes:** Coordinate energy efficiency upgrades throughout Planned Maintenance Programme to minimise disruptions and maximise cost efficiency.
- 4. Tenant Engagement:** Ensure tenants are well-informed, comfortable, and supportive of the retrofitting process, as part of our Tenant Engagement Strategy.
- 5. Understand our Tenants:** Those vulnerable tenants that are most likely to live in homes with damp and mould - long-term illness, experiencing fuel poverty, low income and disability. Fuel Poverty
- 6. Energy Savings:** reduce the amount of energy tenants use to heat their home and water.
- 7. Use Innovative Technology:** That helps us take care of homes, reduces waste and monitoring to make homes warmer, healthier, and less susceptible to damp and mould.
- 8. Funding and Income Utilisation:** Maximise the use of available funding (grants, subsidies, etc) while maintaining financial sustainability and ensure leasehold section 20 consultation to recover costs.
- 9. Work to PAS 2035 Standards:** In order to attract funding, it is a pre-requisite that processes, roles, and quality standards for retrofitting buildings (PAS 2035) are followed, so that projects align with best practices for sustainability, safety, and energy efficiency.
- 10. Active Asset Management and Viability Testing:** Undertake appraisals of our poor performing homes which cannot achieve EPC C by 2030, and where necessary, carry out assessments and consultation on the future of properties that are of concern.
- 11. Know our Homes:** Intelligent and data-led approach that goes beyond just collecting stock condition information and includes energy assessments and damp and mould cases.

COMPLIANCE WITH REGULATOR FOR SOCIAL HOUSING STANDARDS

This retrofit strategy aligns with the Regulator for Social Housing Consumer Standards, ensuring homes are safe, high-quality, and energy efficient. Meeting these standards supports the Council's duty to provide decent housing that promotes tenants' health, safety, and well-being, based on the following key elements:

- 1. Decent Homes Standard Compliance:** The strategy includes energy-efficient upgrades (insulation, heating, ventilation) to meet or exceed the Decent Homes Standard, ensuring homes are safe, durable, and comfortable.
- 2. Safety and Health Standards:** All homes must be free of health hazards (HHSRS). Measures like improved ventilation help prevent damp and mould, safeguarding tenant health.
- 3. Quality Assurance and Building Integrity:** Following PAS 2035, each retrofit is carefully assessed and designed to enhance long-term building performance and resilience.
- 4. Tenants Engagement and Communication:** Clear communication with tenants ensures they understand planned upgrades, potential impacts, and how to maximize post-retrofit benefits.
- 5. Monitoring, Evaluation, and Continuous Improvement:** Ongoing evaluation ensures compliance with PAS 2035 and Decent Homes Standard, maintaining indoor air quality, temperature control, and moisture management.

By integrating Consumer Standards with PAS 2035, this "least regrets" retrofit strategy delivers safe, high-quality, and energy-efficient homes, providing tenants with healthy and sustainable living environments.



DATA ANALYSIS AND METHODOLOGY

The starting point for a retrofit strategy is to analyse the existing data, to establish a baseline for the existing stock. Data from Energy Performance Certificates (EPC's) provides the most relevant and exact intelligence around the energy performance at an individual property level. However, EPC's have a 10-year life and become out of date over time as they will not reflect planned improvements.

The Council currently holds 5,789 EPC's, which represents 73.8% of the total stock. To bring this up to 100%, the Council is in the process of undertaking further EPC's to the remaining 2,059 homes and revisiting those that are approaching 10-years old.

Based on the data available from the EPC's that the Council currently holds, these are broken down as follows:

| EPC Ratings | Actual EPC Rating | | Predicted EPC Rating | |
|-------------|-------------------|-------|----------------------|-------|
| | Number | % | Number | % |
| Total | 5,789 | 100% | 2,059 | 100% |
| A | 3 | 0.1% | 0 | 0% |
| B | 387 | 6.7% | 8 | 0.4% |
| C | 3,723 | 64.3% | 1,143 | 55.5% |
| D | 1,423 | 24.6% | 900 | 43.7% |
| E | 207 | 3.6% | 8 | 0.4% |
| F | 36 | 0.6% | 0 | 0% |
| G | 10 | 0.2% | 0 | 0% |

The average EPC rating across all of the Council's properties is an EPC C rating.

HOW WILL WE MEET OUR TARGET?

Each property will need to be assessed individually, using a suite of measures that will incrementally raise the SAP score to reach an EPC C rating. The suite of measures will include the following:

- Installing low energy LED lighting
- Fitting draughtproofing to windows, doors and loft hatches.
- Installing hot water cylinder jackets
- Installing or topping up loft insulation to 300mm including insulating loft hatches
- Installing new double or triple glazing
- Installing cavity wall insulation
- Installing External or Internal Wall Insulation
- Upgrading gas boilers with time, temperature and zone heating controls (TTZC)
- Upgrading existing electric heating with high efficiency heaters
- Installing Air-source Heat Pumps
- Installing Solar PV to roofs

To maximise efficiency and minimise disruption, retrofitting measures will be delivered in tandem with existing maintenance and improvement programmes:

- 1. Planned Maintenance Cycles:** Where roof replacements, window replacements, or other major structural work is planned, integrate insulation, glazing, and solar PV installations into the programme to avoid repeated disruptions.
- 2. Decarbonisation and Modernisation Programmes:** Align the installation of low-carbon heating technologies, such as ASHPs or solar thermal, with existing boiler replacement programmes or heating upgrades.
- 3. Health and Safety Upgrades:** Combine ventilation upgrades with mould and damp management interventions, ensuring holistic improvements in both energy efficiency and tenant well-being.
- 4. Tenant-Led Upgrades:** Involve tenants in decision-making, especially where disruptive works like external wall insulation or heating system replacements are planned. Provide them with information on the benefits, cost savings, and environmental impact.



HOW WILL IT BE FUNDED

To ensure the financial sustainability of the programme, the following funding sources and incentives will be pursued:

- 1. Existing Capital Programme:** Using our existing Capital Programme is more flexible as the Council will not need to appoint PAS2035 designers, co-ordinators or installers, and can work with existing local contractors. The Council has already allocated £X for decarbonisation within its Medium Term Financial Plan until 2030.
- 2. Government Grants and Schemes:** Consider the use of available funding schemes such as the Warm Homes: Social Housing Fund (WH:SHF) and Energy Company Obligation (ECO) and consider alternative funding options such as “Rent-a-roof” schemes for solar installations, particularly on flat blocks by leasing out roof space to a solar provider in exchange for solar panel installation at little or no upfront cost.
- 3. Cost-Effective Procurement:** Employ procurement frameworks to negotiate bulk pricing on materials and installations, ensuring value for money and efficiency in project delivery.

TENANT ENGAGEMENT

Tenant engagement is critical to the success of the retrofit programme, including:

- 1. **Communication and Education Plan:** Engage with tenants to explain the benefits of energy efficiency measures and how they will improve comfort and reduce energy bills and provide clear timelines and expectations for disruption.
- 2. **Support Mechanisms:** Support tenants during retrofit work and encourage energy-saving behaviours with practical tips on managing heating and ventilation systems post-retrofit.
- 3. **Feedback Loops:** Establish a clear process for tenants to provide feedback and raise concerns during and after the retrofit process, ensuring continuous improvement and tenant satisfaction.



MONITORING, REPORTING, AND EVALUATION

Monitoring, Reporting, and Evaluation is essential to monitoring success, learn and make improvements to support the delivery of this strategy, including:

- 1. **Pre and Post Retrofit EPC Assessments:** Conduct pre- and post-retrofit EPC assessments for all properties to measure improvements and ensure compliance with EPC C requirements.
- 2. **Energy Consumption Monitoring:** Consider the use smart metering as well as engaging with tenants to monitor energy consumption post-retrofit, ensuring the anticipated savings are being realised.
- 3. **Ongoing Evaluation:** Regularly evaluate the effectiveness of the measures through tenant feedback and energy performance data, refining the approach for future retrofits.
- 4. **Reporting:** Report progress regularly to stakeholders and align outcomes with wider organisational goals for carbon reduction and housing quality.

This strategy, integrated with our Asset Strategy and ongoing investment programmes, will help ensure that all properties achieve at least an EPC rating of C by 2030, while improving the quality of life for tenants, lowering fuel bills, and future-proofing homes against further energy efficiency standards. Through a “no regrets” approach, the measures implemented will not only meet immediate needs but also prepare the organisation for future challenges in the journey toward decarbonisation and net-zero housing.



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01473 432000



www.ipswich.gov.uk
www.ipswich.gov.uk/contactus



Ipswich Borough Council, Grafton House
15-17 Russell Road, Ipswich, Suffolk IP1 2DE