

North West Regional Retrofit Skills Plan

ANNEXES TO MAIN REPORT

June 2024



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The report is provided for the purposes of knowledge transfer across the public sector. It aims to raise awareness of good practice approaches to delivering projects that support the net zero agenda. The **North West Net Zero Hub** is not liable for any decisions adopted by organisations based on the recommendations contained in this report.

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Appendix 2: Stakeholder consultation

A. Interviewees

The project team would like to thank all who contributed via interviews and group discussions.

Organisation	Sub-region, where applicable
Registered Providers of social housing	
Torus	LCR / Cheshire & Warrington
Plus Dane	LCR / Cheshire & Warrington
Weaver Vale Housing Trust	Cheshire & Warrington
South Lakes Housing	Cumbria
Progress Housing Group	Cumbria / Lancashire
Onward Homes	GM / Lancashire / LCR
Retrofit / SHDF group leads	Givi / Lancashire / LCK
Cheshire East Council	Cheshire & Warrington
Cheshire West & Chester	
	Cheshire & Warrington
Warrington Borough Council	Cheshire & Warrington
Westmorland and Furness Council	Cumbria
Greater Manchester Combined Authority	GM
Blackpool Council	Lancashire
Lancaster City Council	Lancashire
Liverpool City Region Combined Authority	LCR
Employers	
Ambue	-
Bell Group	-
BFCE	-
Cara EPS (SME)	-
Carbon Co-op	-
CLC Group	-
Connolly	-
DK Building	_
ECDA	_
Ecosimplified	-
Equans	-
Keegans Group	-
Kensa Engineering	-
	-
Morgan Sindall Construction	-
NetZero Group	
Novus Solutions	-
People-powered Retrofit	-
PH Jones (British Gas Social Housing Limited)	-
Regen-group	-
St.Gobain	-
The Retrofit Hub	-
Thermatic Homes	-
Employer Representative Bodies	
South Cheshire Chamber of Commerce & Industry	Cheshire & Warrington
Cumbria CITB, on behalf of Cumbria Chamber of Commerce	Cumbria
Greater Manchester Chamber of Commerce	GM
North & Western Lancashire Chamber of Commerce	Lancashire
St Helens Chamber of Commerce	LCR
Trade associations and suppliers/manufacturers	
CITB	-
Daikin UK	-
Global Energy Systems	Lancashire
Express Plumbing Supplies	Cumbria
Further education colleges Cheshire College South & West	
L DOCDITO L OLIOGO SOUTH X. WOCT	Cheshire & Warrington
Macclesfield College	Cheshire & Warrington
	Cheshire & Warrington Cheshire & Warrington Cheshire & Warrington

Organisation	Sub-region, where applicable
Lakes College	Cumbria
Oldham College	GM
Hopwood Hall College	GM
The Manchester College (UCEN)	GM
Trafford College Group	GM
Blackburn College	Lancashire
Blackpool and Fylde College	Lancashire
Burnley College	Lancashire
Lancaster and Morecambe College	Lancashire
Nelson and Colne College Group	Lancashire
Preston College	Lancashire
The Lancashire Colleges	Lancashire
City of Liverpool College	LCR
Southport College	LCR
Higher education institutions (HEIs)	
University of Salford	GM
University of Manchester	GM
UCLan	Lancashire
Liverpool John Moores University	LCR
GM Civic University Board	GM
Independent training providers (ITPs)	
The Retrofit Academy	-
Clint Stamper Training	
Groundwork	-
UK Skills Academy	-
Complete Training Solutions	-
The Learning Foundry	-
LEPs and CAs	
Cheshire & Warrington LEP	Cheshire & Warrington
Cumbria LEP	Cumbria
Lancashire LEP	Lancashire
Greater Manchester Combined Authority	GM
Liverpool City Region Combined Authority	LCR
Skills and other reference groups	
Cheshire & Warrington Retrofit Skills Group	Cheshire & Warrington
Greater Manchester SHDF Wave 2 Consortium Group	GM

B. Summary of stakeholder consultation findings

Key themes from stakeholder consultation are summarised below.

Key issues	Strategic priorities	Response in Plan priority
Registered Providers of Social Housing (RPs)		
1. Gaps in technical retrofit knowledge and skills within RPs. Most RPs reported shortcomings in their ability to procure and oversee retrofit works, and to carry out subsequent maintenance. Though this picture is improving in some RPs, feedback highlighted the need for RPs to no longer be reliant on contractors as their primary source of expertise and quality assurance. RPs should be as proficient in retrofit as they are in kitchen and bathroom installations and maintenance. They should be able to interpret retrofit data on their properties and maintain equipment. RPs that have trained their own staff have suffered retention issues (contractors pay better).	Enable RPs to become the 'intelligent client' for retrofit works, providing effective procurement, management and maintenance services to safeguard the quality of retrofit delivery and maintenance where required	A/D
2. Gaps in basic non-technical knowledge of retrofit across a wide spectrum of staff at RPs. Several RPs reported struggling with tenants that have had difficulties adapting to new low carbon heating/PV systems, with frontline staff unable to advise. Knowledge among senior managers of the implications of net zero beyond the delivery of works was reported to be limited.	As retrofit works encompass a larger share of the social housing stock, there is a growing need for staff working at all levels – from the Board to front line – to understand the basics of how retrofit works and to be able to handle everyday queries from residents	D
3. Short term funding availability timescales results in short-term contracts and consequent sub-optimal outcomes in terms of value for money and supply chain investment. This is driven by the timescales of Government funding – e.g. a two-year programme can easily become sub-18 months once procurement is complete.	Develop a more secure pipeline of works that improves contractor confidence and allows the development of a stronger, more diverse supply chain in retrofit.	D
4. Low levels of knowledge among residents about how to make best use of homes once retrofit work has been undertaken; as well as dampening levels of interest among residents for intrusive works such as IWI, heat pumps which are key to achieving EPC 'C'. RP activity to address this appears limited "the focus is on delivering the [retrofit] work, not on customers making the most of it"	Ensure that those living in homes that have been retrofitted are able to make best use of new low carbon technologies	D
5. Social value appears to have a low profile in existing retrofit activity, meaning that local people and residents missing out of the economic benefit of this work. There appears to be an assumption that social value = apprenticeships (Procure Plus reportedly created three apprenticeship vacancies from a £30m contract through a shared apprenticeship scheme). Main contractors often pass SV duties onto supply chain. Contract timescales make apprenticeships difficult but there are other requirements that can be placed on contractors	 Greater incorporation of social value requirements within tender specs as the market gathers confidence and strength, e.g. in relation to: Use of Skills Bootcamps Work trials and work experience for local residents Briefings for local schools/colleges on the retrofit market 	D
6. Skills shortages and gaps are causing some delays to retrofit work , which in turn encourages RPs to take the simplest path to EPC 'C', rather than a more comprehensive 'fabric first' approach. "The drive for EPC 'C' is driving pragmatism, rather than 'best fit' due to cost and installation challenges"	Increase the number of people entering key trades and grow the number of existing workers seeking workforce development training to work on retrofit projects	A/B
Skills gaps in the retrofit workforce are also causing issues with the quality of some installations (especially in relation to damp), with retrofit coordinators highlighted as the occupation of most concern (doubts about effectiveness of short-course training), followed by retrofit assessors and heat pump installers.		

Key issues	Strategic priorities	Response in Plan priority
 Gaps and shortages were reported by RPs in most areas to varying degrees, include: Retrofit Coordinators (skills gap in existing workforce and shortage) Retrofit Assessors (gap and shortage) Thermal bridging (gap) Ventilation (gap) Joiners and general builders (shortage affecting pre-retrofit enabling works) Damp contractors (shortage) Heat pump installers (shortage and gap) EWI and IWI provision (shortage) 		
 7. Some concern that RPs don't yet know the 'right' package of retrofit works for their properties. Clearly the mix of works will vary according to the need of each property (to some extent the availability of contractors). However there was concern expressed by RPs that they are still learning what works (and what doesn't) in relation to retrofit. Some reported that postworks monitoring of the impact of retrofit on energy use and emissions was absent. This may lead to changes in the mix of retrofit works as RPs' knowledge and experience growths "How do we know we're not picking a 'Betamax' solution?" Retrofit / SHDF group leads 	Increase in skills and knowledge within RPs.	D
1. Stop/start nature of the market driven by Government grants hampers efforts to develop supply chain scale, depth and quality. Contractors are 'sceptical and wary' of the retrofit market having had their fingers burned in boom/bust cycle. Short timescales and appetite to hoover up spend creates risk that pragmatic solutions are found to reaching EPC 'C', rather than 'best fit'. DPS and procurement frameworks are a positive development and there is a bit more confidence about market stability than before, but its highly cyclical nature remains a deterrent for many firms to engage. There is optimism that the picture is improving but progress is slow.	Develop and promote a pipeline of works that attracts more contractors to the supply chain and encourages those that are already operating in the market to invest in their workforces for the long term.	D
2. There is scope to deepen the retrofit supply chain among small companies. Small firms' reluctance to enter the market is resulting in some areas of North West not seeing the economic benefit of investment in retrofit accrue locally – work goes to providers from outside the area. This is in part driven by shortages in core trades (e.g. electric, gas, plumbing) meaning that there is no shortage of other work; it's also driven by concerns about an unstable market, as well as the admin requirements that retrofit work brings (TrustMark registration). Procurement timescales mean that consortium models are challenging and customers prefer a single lead contractor. Solar PV is the most developed part of the supply chain, responding to healthier levels of owner-occupier demand, driven by high energy prices.	Using procurement levers, help to create the operating environment that enables more small firms to join the retrofit supply chain.	D
3. Skills gaps are causing issues with the quality and timeliness of some retrofit activity. Examples included heat pumps installed with incorrect heat loss calculations resulting in tenants unable to heat their homes; RPs having to undertake 100% QA of retrofit works due to deficiencies in retrofit coordinator skills and independence. <i>"Surveying is not good enough." "Retrofit Coordinators can be like a tick box exercise."</i>	Grow demand for, and supply of, workforce development training linked to retrofit skills needs.	A/B
4. Skills shortages are causing issues with the timeliness of some retrofit activity. Overall retrofit leads felt that the work is getting done without major delay, but pinch points exist, e.g.	Grow the demand for, and supply of, occupational training within key occupations that are relevant to retrofit	A/B

Key issues	Strategic priorities	Response in Plan priority
 too few retrofit coordinators and assessors electricians are in high demand ASHP installers in high demand too especially those who can do heat loss calculations. This may worsen when the Clean Heat Market Mechanism from c2026, which requires boiler manufacturers to make low carbon technologies a growing % of their installation (tradeable credits) 		
5. The 'able to pay' owner occupier market holds huge potential but what little activity takes place now is driven by individual householders indicating an interest, rather than the supply side seeking their business. Businesses contacting homeowners with grant offers are often assumed to be scams. Low level of householder knowledge about retrofit reported. Some concern about the cosmetic impact of ASHPs, insulation, etc. Most outreach to homeowners is in relation to grant schemes which miss out the largest, most carbon-intensive homes (with greatest ability to pay). However, "once people have seen it (retrofitted homes), they want it" There is awareness that should the owner-occupier market take off, it will (a) be a more complicated picture than social housing owing to higher levels of bespoke needs, and (b) put significant strain on available labour unless an increase in skilled workers is delivered.	Improve the availability of impartial information, advice and guidance to owner occupiers about energy efficiency and home retrofit choices	D
Employers		ſ
1. Quality of retrofit advice, and skills of advisors, varies. Advice and advisers are not to a standard which is supporting the engagement of clients to undertake correct retrofit measures.	Develop an enhanced training programme for Retrofit Advisors, which includes 'retrofit'. Include certification as part of the process.	А
2. There is a shortage of, and skills gaps amongst, Building Surveyors. Increasing requirement for Building Surveyors with 'retrofit skills'. Poor quality assessments is creating inefficiencies in the process of identifying the correct works that need to be completed, and how the works are undertaken.	Improve Advice & Guidance for young people, to choose Building Survey as a career choice. Identify Universities and Colleges who can increase volumes of programmes to meet demand. Adjust Building Survey programmes to include 'retrofit assessments. Develop a career changer programme for trades people to convert into Building Surveyor roles.	В
3. There is a shortage of installers of Ground & Air Source Heat Pumps and Photovoltaics. Insufficient supply of Installers to meet demand. Many firms stated that they could grow their business in this area if there was a ready pool of skilled people available.	Significantly increase the supply of primary trades, electricians/plumbers/gas engineers. Improve advice & guidance for young people. Implement grants for companies to take on additional apprenticeships in this area. Develop options for career changers to enter these occupations.	A/B
4. Administrative and digital skills gaps amongst tradespeople. Retrofit schemes have relatively high levels of audit/compliance/scheme administration requirements. Improving tradespeople's skills in these areas could reduce down time, to improve efficiency and productivity of retrofit work.	Encourage skills supply side to develop contextualised programmes for retrofit work.	A
5. Shortages in non-trade / semi-skilled roles. Retrofit drives substantial demand for non-trade roles, such as insultation removal. More people working in these roles are needed.	Increase the volume of trained personnel to undertake non-trade roles. Skills Bootcamps for retrofit are considered a potentially positive step.	A/B
6. Interest in careers within the sector at large is an area of concern. A pipeline of younger people entering the sector is needed. There is an opportunity to capitalise on the broader interest in sustainability within the next generations and drive conversion into interest in related jobs and careers.	Improve avenues of organised engagement and knowledge transfer between schools, colleges and the wider private sector. Need to a central convening power to promote jobs and careers within sector.	B/C

Key issues	Strategic priorities	Response in Plan priority
7. Demand side planning and co-ordination of works would reduce loss of skills and allow the supply side to work more effectively with the skills suppliers to plan volume of apprentices and achievers of study programme courses.	Encourage the usage of Framework partners such as Procure Plus and Fusion 21, so that works planning can be better achieved and greater value of labour planning can be communicated to the skills supply side.	D
8. Lack of understanding, transparency and consistency within public sector tendering processes results in reluctance to engage with retrofit work amongst some contractors.	Increase regional dialogue and awareness around tendering and contracting terms/processes. Encourage the formation of targeted regional assets (centralised online resources, sector panels etc) that improve the understanding/knowledge of tendering requirements and panels.	D
9. Under-skilled supplier entrants into the sector may engage in bad practice which could damage the sector's reputation and consumer appetite for retrofit.	Grow pipeline of appropriately skilled and accredited contractors. Offer opportunities for upskilling for currently unqualified but willing contractors.	D
10. Under-developed knowledge amongst businesses about 'how to grow', including sales, finance, and access to funding and accreditation. Under developed knowledge of how to build capacity using skills suppliers.	Consider business support offer targeted at small businesses which do or could work in the retrofit space.	D
Employer representative bodies and trade associations		
1. Implementing LSIPs and tracking progress is key. Programmes are underway in some sub- regions, e.g. green skills clusters / working groups. LSIF programmes all satisfactorily align with LSIP content.	Track all college accountability statements/annual progress reports for reflection of LSIP and any other Retrofit content. LEP/CA or Net Zero hub could meet with colleges and/or ERBs formally to check progress/action.	E
2. Development of retrofit facilities in colleges is still mixed with some sub-regions (GM, Lancashire) a little ahead. All sub-regions have some problems with construction staffing in colleges.	Get colleges fully geared up with equipment and staff. Consider annual "audit" of facilities and staff capacity in North West colleges. Create a standard for equipment and curriculum across North West. Introduce recruitment and training programme for college staff.	E
3. Increasing supply side interest in participating in retrofit is critical. ERBs have had contacts with low carbon contractors but mainly social housing and new build developers. LCR ERB doing large scale construction campaign (wider than Retro) <i>"Improving contractor demand is the biggest issue by far."</i>	Increase contractor interest in retrofit. Extend current programmes of demonstration events for owner managers/contractors using college facilities (some colleges doing already). Introduce business support programme for mainstream plumbing / electrical / building contractor employers / owner managers. Raise awareness and understanding of how to become approved for national and other grant schemes and meet their administrative requirements.	D
4. There are insufficient apprenticeships in key trades. There are good levels of full-time provision but insufficient movement into work/training afterwards.	Introduce apprenticeship growth strategy for all key trades. Stimulate all colleges to measure and action progression into employment/accelerated apprenticeships after full time courses. Improve college destinations measurement (as some colleges have done) to show progression into related trades.	В
5. Adults also need to move into key trades to boost numbers. There have been some examples that have worked well, e.g. bootcamps for insulation skills, Reaseheath College's 'veterans into construction' programme.	Increase skills supply for main trades. Region-wide AEB/Bootcamps programme for entry to both fully skilled trades (e.g. plumbers, electricians) and semi-skilled (e.g.) insulation. Support targeted programmes following the model of 'veterans into construction'.	A/B
6. Upskilling existing tradespeople in retrofit will be key to meeting demand. Delivery of short courses by colleges is currently very limited.	Develop trades upskilling programmes. Some ERBs would support a collaborative short course programme (including open as well as bespoke courses) in each sub-region.	A
7. Shortage of energy/retrofit assessors is a notable skills shortage.	Introduce region-wide programme of energy/retrofit assessors training – likely using AEB.	A/B

Key issues	Strategic priorities	Response in Plan priority
8. Action on diversity is important but currently limited in scale. There have been some initiatives within individual colleges. Some success with women-only programmes.	Take action to increase participation of under-represented groups in construction. Support expansion of women-only programmes for construction trades in each sub-region.	С
Skills providers		•
1. Capacity of providers in terms of facilities, course design and equipment. At present this is mixed. While some are very well equipped with 'low carbon houses' or whole areas, others are only just starting. SDF, capital bids and now LSIF have provided the capital.	Equip and encourage providers which deliver construction programmes to deliver retrofit related to the trades they deliver. Provide funding for course design, possibly before providing funding to employers (recurrent issue of funding coming before provision, leads to cart-before-the-horse scenario). Ensure that more rarified specialism are available at least in each sub-region (e.g. grey water recycling, ground source heat pumps)	E
2. Capacity of providers in terms of staff is a significant issue. Most Providers are having difficulty recruiting and retaining construction staff, often due to improved pay packages in industry. Staff also need upskilling regarding retrofit.	To upskill all Retrofit trade related staff to be able to deliver Retrofit training: Plumbing/heating and ventilation, electricians, carpentry and joinery, insulation, roofers, EV and PV installers. Promote initiatives on recruitment and retention of construction staff. Make training available at providers which are well equipped, for a wider area. Ensure that more rarified specialisms are available in at least one provider per sub-region	E
3. Availability of apprenticeship training in retrofit related trades is not consistent. Not all providers deliver the same range of apprenticeships for which they deliver full time courses. Apprenticeship training provider and ITP staff also need upskilling.	Extend the availability of Retrofit related apprenticeships. Upskill all Retrofit trades-related apprenticeship staff to deliver Retrofit training. Extend use of Provider Retrofit facilities to ITPs. Promote networks in each sub-region of both Providers and ITPs which deliver construction apprenticeships	В
4. Volume of apprenticeships in the main trades must increase to drive volumes in the workforce. Providers did not report any significant change in the diversity of learners. "Most learners are in a trade apprenticeship because it's what their families do"	Increase apprenticeship volumes in retrofit related trades. A strategy for apprenticeship growth will be needed, working with partners across the sector including CITB.	B/C
5. National standards tend to include Retrofit as an option not necessarily a requirement. Some Providers have already made retrofit an entitlement for all related trade full time 16 to 19, adult and apprenticeships. This should become the norm. There is also some evidence that, where apprentices have been trained in retrofit and their employers do not yet deliver this, then the apprentices can cause the employer to take an interest and e.g. attend awareness events or workshops.	Make trade-related retrofit training an entitlement in 16 to 19, adult and apprenticeships	В
6. Retrofit programme content can vary significantly as can equipment and staff competence. Content can vary from basic demonstration right to full competence.	Create a consistent approach and standard in equipment, staff competence and programme content across the North West. The North West could create a training specification for both staff competence and programme content, together with a standard for facilities and equipment. Some Providers have already created short course awards which could be used/modified for a standard approach	E
7. The area of 'smart homes' / digital systems for control is sometimes neglected. It requires quite extensive knowledge and understanding.	Include digital skill and knowledge and understanding in this area into retrofit training.	E
8. There is insufficient provision for adults both in the trade training itself and in upskilling for Retrofit (part time and full time programmes). There are good examples of adult training for electricians and plumbers, and for dry lining and insulation but these are relatively isolated	Increase volumes of retrofit related trades training and upskilling. Establish more specific AEB programmes and bootcamps in related trades, and in related Retrofit	A/E

Key issues	Strategic priorities	Response in Plan priority
9. Insufficient offer of Energy Assessor and Retrofit Assessor programmes	Increase availability (and quality in some cases) of assessor programmes. Consider establishing specific centres for energy assessor / retrofit assessor training with capacity for high volumes	A/E
10. Various providers are seeking to offer short courses for upskilling with very mixed success. Demand is generally poor, although with effort specific programmes can be sold. Providers have mixed success with marketing programmes and some would value help with this. Some providers feel that this is an area where competition between providers can have unhelpful effects. Some providers have run successful events for employers, e.g. awareness and demonstration.	Establish successful offer of short courses for upskilling. Create collaborative partnerships for upskilling programmes in each sub-region. Each group to have a comprehensive upskilling offer making the best use of facilities and staff and working geographically for employers and self emp workers. Support a large-scale programme of employer events across the North West built into a wider marketing strategy/programme	E
11. Mixed support in terms of funding, guidance and steering from elsewhere in the eco- system, particularly around facilities, course design and intra-sectoral communications. Some providers feel they lack visibility of future demand and where they should invest to support future retrofit/green skills growth.	Promote collaborative working at a sub-regional level to plan for skills needs.	E
12. Wider challenges to drive interest from both learners in construction careers, due to stereotypes / reputation of sector. LEPs / CAs	Improved engagement / IAG programmes with young people.	B/C
1. Short-term and unpredictable demand (because it tends to be bid-based plus access to underspends) does not encourage a strategic approach to planning and skills. North West in general / LCR in particular have demonstrated a capacity to work efficiently and disburse budgets plus take on underspends from elsewhere. Difficult to say whether this has helped address any skills gaps or caused them. A concern that retention of expertise is a problem between grant episodes.	Build strategic engagement with employers that is not funding dependent. Build on success of procurement routes that have been developed. In GMCA, expectation that devo deal will seek to take measures to streamline funding.	D
2. Demand is not sufficient to help build workforce, in part due to low return on investment in works at present. Encouraging tradespeople to get involved in retrofit is still difficult with demand stuttering, although there are some signs of growing interest with increased awareness.	Continued endeavours to maximise North West's usage of government funding rounds to increase demand and activity in the region.	D
3. Risk that (retrofit employer) capacity in market will constrain progress even when funding is increased/ put on a more sustained footing. Access to materials and supply chain would also be an issue and skills would be a third reason for not being able to progress. Growth in retrofit skills driven by this demand may be covered by existing supply (given sufficient plumbers/ electricians can obtain skills relatively quickly) but underlying replacement demand is concerning when trade apprenticeships are difficult to obtain.	Act to increase pipeline of talent for key trades – plumbers and electricians but carpenters and external wall insulators. Use procurement to encourage more apprentices (accepting that this may require longer-term contracts).	A/B
4. Need to be cognisant of developments in technology in planning for skills needs. Modern Methods of Construction (MMC) could provide economies of scale – using accurate digital scans of properties to enable higher quality off-site assembly of retrofit technologies (e.g. solar PV, insulation, low carbon heating), reducing time on site and disruption. Off-site construction may also attract workers who would not otherwise consider a career in construction.	Engagement with employers and manufacturers.	D
5. Engagement from housing associations is still mixed. Fractured demand has restricted ability even among 'public' housing authorities to offer retrofit in a way that best supports skills development.	Increase partnership working with housing associations	D

Key issues	Strategic priorities	Response in Plan priority
6. Private market suffering especially in cost-of-living crisis. 'Your Home Better' in GMCA is a model to emulate, but enquiries for assessment currently outpace conversions into implementation.	Support initiatives to grow 'able to pay' market.	D
7. FE colleges have strengths and facilities that can be built upon , including some centres of expertise in green skills.	Develop equipment and staff capacity in FE colleges.	E
8. Cultural shift is needed to make green skills more mainstream as a career or reskilling option. Greater nuance is needed in messaging around in green skills with different shades of green jobs, including messaging to young people on careers.	Careers support required to ensure profile of green career options is raised	B/C
9. Diversity in the retrofit / construction workforce must be improved, in particular participation by women and BAME groups.	Action to ensure that young people are aware of the opportunities and more pro-active engagement with women and BAME groups.	С
10. Labour shortages and economic inactivity are both issues in the economy more broadly. Opportunities to engage the economically inactive in retrofit careers should be pursued.	Increase volumes of actions such as Bootcamps to provide entry routes to sector. Engagement with Job Centre Plus. Support initiatives to promote workplace adjustments for people with disabilities and mental health issues.	B/C
11. Cumbria has specific challenges relating to a limited local supply chain (along with very different issues in the West compared to other areas and national parks). National Park planning restrictions also add complexity to retrofit.	Build plan for retrofit across Cumbria.	D