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# Welsh Housing Quality Standard Consultation

Summary of Responses



Llywodraeth Cymru  
Welsh Government

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# Wavehill: Social and Economic Research

## Our offices

- Wales office: 21 Alban Square, Aberaeron, Ceredigion, SA46 0DB (registered office)
- West England office: 2-4 Park Street, Bristol, BS1 5HS
- North of England office: Milburn House, Dean Street, Newcastle, NE1 1LF
- London office: 2.16 Oxford House, 49 Oxford Road, London, N4 3EY

## Contact details

Tel: 0330 1228658

Email: [wavehill@wavehill.com](mailto:wavehill@wavehill.com)

Twitter: [@wavehilltweets](https://twitter.com/wavehilltweets)

## More information

[www.wavehill.com](http://www.wavehill.com)

<https://twitter.com/wavehilltweets>

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## Report authors

Marianne Kell, Beth Tweddell, Llorenc O'Prey

Any questions in relation to this report should be directed in the first instance to

[Marianne.kell@wavehill.com](mailto:Marianne.kell@wavehill.com)

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# Background to the Standard

A key objective of Welsh Government is to **improve the quality and energy efficiency of social homes across Wales and to decrease their environmental impact**. The Welsh Government have drafted an update to the Welsh Housing Quality Standard to further improve social housing across Wales building on the achievements of the existing standard which has been in place since 2002. The proposals seek to strengthen existing provisions and extend the focus of the Standard into new areas. This includes improving energy and water efficiency, and adding elements related to flooring and noise. At its heart, the proposed new Standard is **tenant-focused**. As such, the proposals are designed to upgrade social homes in a way that contributes to **positive health** and **improves education** and **wellbeing outcomes** for tenants.

For further information about the proposals, such as a summary of the scope and key focus areas of the Standard, please contact the Welsh Government via the [housingqualitystandard@gov.wales](mailto:housingqualitystandard@gov.wales) mailbox.

Building on the achievements of the 2002 Standard, the proposals set out to update and extend the areas covered through a proposed new Standard. This includes a reflection on **what high-quality social housing means and** introducing low-carbon technologies that improve the quality of homes. The proposals suggest updates to existing areas of focus, including:

- Data collection and reporting
- Compliance policies, and
- Fire and electrical safety.

The proposals also aim to **extend the focus of the Standard** into new areas. This reflects broader issues and priorities in a changing global context, including affordability and reducing the environmental impact of social housing. New areas of focus within the proposals include:

- Affordable warmth and environmental impact
- Flooring
- Water efficiency
- Biodiversity
- Active travel, and
- Noise nuisance.

# Profile of respondents

Respondents to the consultation represented a diverse range of stakeholder groups, including tenants, social landlords and other interest groups. There was overall support for the ambition of the Standard, and an understanding of why it is needed. Across many aspects of the Standard, stakeholder views encompassed a wide range of perspectives: from the proposals being too ambitious, through to not ambitious enough. This reflected the different priorities of the stakeholder groups and tended to inform views towards specific aspects of the proposals.

In total, there were 282 respondents to the consultation, online, via email, and in writing. Of these, there were 80 **incomplete responses** via the online survey.

The 202 complete responses included **105 tenants** living in social homes (52 per cent of all respondents). A further **32 social landlords** contributed their views (15.8 per cent). The social landlord group includes third and public sector organisations that provide social housing services and support, including managing and maintaining social homes across Wales.

In addition, **15 representative bodies** submitted responses (7.4 per cent). This group includes organisations that represent tenants, social landlords and local government. There were also representatives from the building industry and supply chain providers, as well as chartered institutes that reflect the views of professions such as surveyors.

**30 other individuals and organisations** responded (14.9 per cent), representing a diverse range of organisations, from housing charities, environmental groups, through to individual suppliers to the social housing sector. A further **12 individuals** responded as technical experts in fields as diverse as social housing, nature conservation, resource management, and energy saving technology (5.9 per cent). **Eight respondents** offered their views as members of the public (4 per cent).

## Approaches to analysis

In September 2022 the Welsh Government commissioned Wavehill, an independent research organisation, to conduct this analysis of responses. This analysis sets out to understand and map the range of views and perspectives held by respondents with respect to the proposed Standard.

The consultation asked **25 questions**, most of which were presented in two parts:

- The first part asked closed questions, i.e. invited initial “yes/no” responses.
- The second part then invited broader reflections in a free text response.
- Seven questions were opened-ended only, inviting free text responses.
- Of these, three had no defined word limit.

All responses were examined, including those incomplete. However, some incomplete responses have not been included in the final analysis: where it was either not possible to establish which stakeholder group the response represents; and/or responses have not provided further suggestions to improve the Standard, and/or where insufficient information was provided. These views were instead captured and represented elsewhere in the qualitative analysis.

## Overview of findings

### Delivering the Standard: Definitions and ambitions

The responses highlighted clear support for the expanded definition of social housing. It was also recognised that the ambition of the WHQS2023 exceeds the wider UK benchmarks for the journey to net zero. Less clear was the response to the balance of the Standard between being bold and being achievable. Differences in stakeholder interests and priorities led to a polarised view, 91 per cent of social landlords felt that the new proposed Standards fails to strike a good balance between being bold and being achievable. In contrast, 79 per cent of tenants agree that the Standard achieves a good balance.

The responses widely recognised (78 per cent of respondents) that having a high-quality home has a positive impact on health and wellbeing. 90 per cent of social landlords and 77 per cent of tenants agreed with this statement.

74 per cent of all respondents agreed that the proposed Standard covers all the key areas that they would expect. However, there were pockets of disagreement from some of the stakeholder groups, especially amongst technical experts (42 per cent), other respondents (38 per cent) and representative bodies (33 per cent).

Less than half (46 per cent) of all respondents considered the timescale appropriate. Of those who disagreed, almost all of them believed that the target outlined in Part 3 of the Standard was too soon. When answering the question of whether social homes in Wales should comply with the Standard by the end of 2033, most social landlords (94 per cent) disagreed, as did technical experts (63 per cent) and representative bodies (60 per cent). On the other hand, tenants were mostly supportive (62 per cent).

The proposed Standard places a range of obligations on social landlords. This includes promoting and facilitating tenant engagement and involvement in decision making, especially on issues that affect their community and environment. Overall, 79 per cent of respondents that answered the question were in agreement. The only group to report differences of opinion were technical experts, of which 57 per cent disagreed.

## Homes must be safe and secure

The proposed Standard seeks to ensure that all homes comply with the Secured by Design initiative developed by the Police Force. The initiative encourages the adoption of crime prevention methods in new and existing housing and aims to achieve a good standard of security for both the home and the surrounding environment. For more information and guidance on how homes can achieve Secured by Design status, [click here](#).

This includes additional security features for doors and windows, fire safety and additional alarms, gas and safety inspections, and surveillance systems. Across all respondents answering the question, less than half (46 per cent) suggested that additional safety and security elements could be added. Social landlords disagreed (83 per cent) most strongly to the proposal that additional safety and security elements could be added.

## Homes must be affordable to heat and have minimal environmental impact

A key objective of the new Standard is to improve the energy efficiency of social homes in Wales. This is to ensure affordability and reduce fuel poverty, as well as improve environmental performance of homes. Through a range of low-carbon technology measures, retrofits and improvements, the Standard proposes that all social homes should achieve the highest Energy Performance Certification rating (EPC A). 85 per cent of tenants agreed that the Standard should aim for the highest rating. Social landlords were split down the middle, i.e. 50 per cent agreeing and 50 per cent disagreeing. Overall, across all respondents answering the question, 75 percent of respondents agreed with the target.

Alongside increased energy efficiency, a key element of the proposed Standard is the reduction of carbon emissions from homes. This is to support the aim to achieve Net Zero across social housing by 2033.

The proposals suggest using the Standard Assessment Procedure (SAP) to support improvements to energy efficiency in homes. SAP is a methodology which is an industry recognised standard and used universally across the UK. It is used to assess and compare the energy and environmental performance of dwellings. It helps to provide assessments which can then inform the EPC rating (A-G) that is given to a home.

SAP includes a calculation for building fabric and heating systems, and minimum standards of thermal efficiency. Overall, respondents welcomed the use of SAP methodology in the Standard, although it was noted that they may need to be revisited at a later date as the SAP methodology is updated.

The proposals suggest using Environmental Impact Rating (EIR) as a measurement to assess the carbon emissions of homes. An EIR is based on a calculation of annual carbon emissions from heating the home and water, ventilation and lighting, minus emissions saved by energy generation at the home. Overall, 85 per cent of all respondents agreed with the measure. Whilst most technical experts were in agreement, 38 per cent disagreed.

EIR 92 is the rating for the most environmentally efficient buildings. In working towards net zero across social housing, the proposals include a target of achieving an average of EIR 92 across homes managed by a social landlord. Where achieving EIR 92 within an individual home may be too difficult and/or costly, the proposals suggest that social landlords could balance that with more efficient homes that achieve a higher rate, or alternatively, through other defined Community Carbon Benefits. This provides landlords with a flexible approach to achieving net zero across their stock. There was broad support from tenants for this proposal, at 95 per cent and representative bodies at 80 per cent. In contrast, only 25 per cent of social landlords and 38 per cent of technical experts agreed with this target.

To achieve the carbon emissions target, the proposed Standard includes a requirement to stop installing fossil fuel boilers from 2026. This is to encourage the transition to more environmentally friendly and efficient hot water and heating in homes. The most significant opposition to the proposal was from social landlords, with 81 per cent disagreeing. Tenants on the other hand were more positive, with 73 per cent agreeing. Overall, of all respondents answering the question, 59 per cent agreed with the timescale for transitioning to more environmentally friendly heat sources.

Lack of clarity of the funding landscape to support the green transition within the social housing sector was highlighted by respondents, especially social landlords, as a barrier to achieving the highest energy performance rating (EPC A) for all social homes in the proposed timescales. However, EPC A was considered by respondents to be positive as a longer-term target, as long as sufficient funding measures were attached to support the interventions needed to reach the highest rating.

## Wider context

The proposed Standard includes measures to improve water efficiency to improve overall efficiency of homes. This includes installation of water saving devices and other measures when replacing fittings and fixed appliances. The majority of all respondents were supportive of the proposals (75 per cent). Technical experts, other organisations and representative bodies, however, offered the most disagreement towards the proposals (50 per cent, 47 per cent and 38 per cent).

Flooring is a new area of focus for the proposed Standard. Tenants expressed to Welsh Government how important flooring is throughout their home. In response, the proposals suggest that all habitable rooms, including bedrooms and living rooms, staircases and landings located within the home should have suitable floor coverings at change of tenancy if required. Representative bodies and tenants were most in agreement with the proposals (86 per cent and 81 per cent respectively). Social landlords voiced the most disagreement (52 per cent). Overall, 74 per cent of all respondents agreed with the proposals.

## Key themes

### Greater flexibility

The view that the Standard should adopt a more flexible approach to achieving the targets was widely represented across stakeholder groups. This was due to the challenge of improving energy efficiency in some property types compared with others. Some respondents, particularly technical experts and social landlords suggested that the Standard needs to take into account the age of the property. New builds, for example, should be able to achieve EPC A rating and improve energy efficiency more easily than older properties such as Victorian-era terraced housing.

### Economic uncertainty

Respondents from each of the stakeholder groups expressed concerns related to external economic factors. This included issues such as inflation, increased energy prices, energy security, supply chain capacity, labour market volatility and skills shortages.

Tenants and social landlords in particular shared concern around rising inflation, energy costs, and the cost-of-living crisis. Due to the worsening of economic conditions, it is likely that if the consultation was carried out again, pressures related to living costs, energy prices and general economic uncertainty would bring these issues further to the forefront of the consultation findings.

For technical experts and social landlords, supply chain issues were a key concern, including material and labour shortages. The skills gap in low-carbon housing was also a key concern, particularly for technical experts. This refers to the shortage of skills required to assess and retrofit social housing properties up to the required standards. The shortage of skills and expertise affects not only Wales but also the wider UK.



## Need for further guidance

Social landlords in particular sought further clarification on funding that would accompany the proposed Standard. The findings suggested that additional funding would support planning and enable more detailed understanding of feasibility of the proposals in terms of both scope and timescales.

Some respondents from the social landlords and tenant's stakeholder groups expressed a need for further information related to societal responses to climate change, and improved knowledge related to lifestyle measures individual households can adopt. Examples of this include efficient domestic energy use, affordable warmth tariff switching, and use of smart meters.

## Retrofits

Retrofits refer to measures taken to increase the energy efficiency of homes so that energy consumption and carbon emissions are reduced. These changes should also contribute to healthier, more comfortable homes and lower energy bills. Many respondents highlighted the importance of drawing on lessons from the Welsh Government's [Optimised RetroFit Programme](#). It was suggested that this would enable more effective responses to the proposed Standard. From these perspectives, the lessons learnt from the programme should be shared broadly across the sector.

Technical experts in particular, and some social landlords, were of the widely held view that a fabric first approach to retrofits is necessary to avoid increased energy bills stemming from improved heating solutions (such as heat pumps) installed in homes with poor thermal efficiency. It was considered important to implement a phased sequencing of retrofitting, where homes must be well-insulated before heat pumps are installed.

Some respondents, including those that welcomed the rationale behind the targets, highlighted the importance of placing the needs of tenants at the centre of decisions on boilers. This included ensuring that a "fabric first approach" is taken, which means improving the energy efficiency of homes prior to transitioning to low-carbon boilers.

## Achieving net zero

The proposal to achieve net zero from a social housing provider's whole housing stock rather than on a property-by-property basis was welcomed by many respondents, particularly housing associations and local authorities. Some respondents suggested a whole life cycle approach that took account of the carbon footprint of retrofitting homes themselves. Respondents noted a need to install Smart Meters in social housing properties. Technical experts highlighted that data generated by domestic energy use in homes would support social landlords in prioritisation of measures and carrying out targeted energy efficiency improvements.

While respondents recognised that they are not perfect and several solutions were presented as alternative options (such as using a kilowatt hour approach), there was a clear feeling that the EPC and SAP methodologies were considered by respondents the best available tool. This was considered the right approach given the level of standardisation and widespread recognition across the UK.

However, technical experts provided notes of caution when using SAP methodology, such as ensuring a degree of flexibility to allow for the possibility in future to include other measures or alternative metrics as they evolve. From these perspectives, the SAP/EPC approach was considered by technical experts to be limited in its ability to guide responses because it models the energy efficiency of a home against a set of benchmarks which may be subjective. Some responses, particularly from the technical expert and representative organisation groups, suggested that there is a need to incorporate health and wellbeing indicators alongside technical measures to achieve energy efficiency and carbon reduction. Technical experts also noted a need to allow a degree of flexibility to allow incorporation of new low carbon technologies as they develop, for example hydrogen mixing technology.

## Priorities by stakeholder group

### Tenants

For tenants and their representatives, the ambition of the proposals was recognised and welcomed. The emphasis on improving the quality and efficiency of social housing was appreciated as an important consideration of the Standard to improving the welfare of tenants.

There was extensive support for the expanded remit of the Standard, such as seeking to improve energy performance and flooring. Some tenants felt that the proposals could go further and faster. Together, this suggested that amongst tenants the proposed Standard reflected their interests and concerns surrounding the quality of social homes.

## Social Landlords

Social landlords acknowledged the rationale and objectives behind the proposed Standard. Many felt, however, that the proposals were too ambitious. Social landlords raised a range of potential strategic, operational and financial implications and constraints that may present challenges in meeting the proposed Standard.

The proposed response to decarbonisation requirements, including in achieving EPC A and EIR 92 by 2033, was considered by social landlords to be a particular challenge. It was noted however that SAP EIR 92 is not equivalent to net zero but helps define targets that contribute towards achieving net zero. However, without significant additional funding or extending timescales surrounding implementation, many felt that this could lead to ineffective or inefficient action.

Some respondents voiced concern that the proposed Standard could lead to some landlords taking a “path of least resistance.” This means that without sufficient incentive, they may assess that it is more cost-effective to simply dispose of older properties which require a lot of work and costs to meet the EPC A rating.

## Other Stakeholders

Other stakeholders, including representatives from industry, environmental groups, and broader public bodies presented a more mixed picture. Environmental groups, for example, welcomed the increased emphasis on decarbonisation and responses leaned towards the viewpoint that the proposals could go further and faster.

Other groups, including professional bodies, raised concerns related to barriers to finance and skills shortages that could limit responses to the proposals.

## Stakeholder support for the WHQS2023

The responses highlighted that across the stakeholder groups, there is clear support for the expanded definition of social housing and what the Standard seeks to achieve. The findings suggest that the connection the proposals make between high quality housing and improved social and environmental outcomes was recognised and welcomed across the stakeholder groups.

The findings reflected a real sense of recognition across the stakeholder groups of the need to work collectively to move towards a more sustainable Wales. It was acknowledged that the Standard seeks to drive this forward. The tenant-centric focus of the Standard was broadly recognised and considered a positive foundation for the Standard and moving towards healthier, more comfortable, more efficient and environmentally-friendly homes.

# Appendix: Organisational Responses

This section lists the organisations that contributed responses to the consultation.

Adra	NIBE Energy Systems UK
Age Cymru	North Wales Fire & Rescue Service
Audit Wales	North Wales Housing
BARCUD Cyf	Pembrokeshire County Council
Barcud Monitoring Group	Pobl Group
Betsi Cadwaladr University Health Board Public Health Team	Powys County Council
Bro Myrddin Housing Association	PYC Group
Bron Afon Community Housing	RDE Ltd
Cadw, Welsh Government	RHA Wales
Caerphilly CBC	Rhondda Cynon Taf CBC
Cardiff Community Housing Association	RNIB Cymru
Cardiff Council	Royal Institution of Chartered Surveyors (RICS)
Care and Repair Cymru	Sero Group
Carmarthenshire County Council	Severn Trent Water
Cartrefi Conwy	Shelter Cymru
Chartered Institute of Housing Cymru	Solar Energy UK
CITB Cymru	South Wales Fire and Rescue Service
ClwydAlyn Housing Ltd	Sustainable Energy Association
Coastal HA	Swansea Council
Community Housing Cymru	Tai Pawb
Consumer Council for Wales	Tai Tarian
Cycling UK (cyclinguk.org)	The Bevan Foundation
Cynon Taf Community Housing Group	The Chartered Institute of Building
Denbighshire County Council	TPAS Cymru
Dwr Cymru Welsh Water	TPR Financial Ltd
Elmhurst Energy Ltd	Trivallis
Energy Saving Trust	UK Finance
FCHA	Vale of Glamorgan Council
Friends of the Earth Cymru	Valleys To Coast Housing
Grwp Cynefin	Wales & West Housing
Hafod	Wales Green Party
Isle of Anglesey County Council	Water Regs UK Limited
Kingspan Insulation Ltd	Waterwise
Linc Cymru	Welsh Local Government Association
MAWW FRS	Woodknowledge Wales
MCS Charitable Foundation	Wrexham County Borough Council

Melin Housing Association  
Monmouthshire County Council  
Monmouthshire Housing Association  
National Insulation Association  
Natural Resources Wales  
Newydd Housing Association

## Contact us



0330 122 8658



[wavehill@wavehill.com](mailto:wavehill@wavehill.com)



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