



Llywodraeth Cymru  
Welsh Government

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Welsh Government  
**Welsh Housing Quality Standard Consultation –  
summary of policy responses**

September 2023

Mae'r ddogfen hon ar gael yn Gymraeg hefyd / This document is also available in Welsh  
Rydym yn croesawu gohebiaeth a galwadau ffôn yn Gymraeg / We welcome correspondence and telephone calls in Welsh

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## Overview

The existing Welsh Housing Quality Standard (WHQS) which has been in place since 2002 is to improve the quality of social homes in Wales. All social homes in Wales are required to meet and maintain this standard.

This Standard is to be replaced by a new standard, WHQS2023 to reflect changes to how people live, work and feel about their homes, and to start decarbonising the Welsh social housing stock at scale.

The new standard was consulted on in 2022 and all the responses to the consultation have been analysed and reflected upon.

The results of the analysis were summarised and published on our website in December 2022. You can view that report here: [Welsh Housing Quality Standard 2023 | GOV.WALES](#)

Welsh Government has now considered the analysis of the consultation responses and agreed the amendments to be made to the standard.

These are listed below, and more detailed information can be found in the spreadsheet in Appendix 1.

The area of biggest change is in Part 3 of the standard, the section on Affordable Warmth and Decarbonisation. A planned approach is to be adopted and this is outlined in Appendix 2.

## **Action Required**

This document is for information only.

## **Further information and related documents**

Large print, Braille and alternative language versions of this document are available on request.

## **Contact details**

For further information:

Housing & Regeneration Division  
Welsh Government  
Cathays Park  
Cardiff  
CF10 3NQ

Email: [housingqualitystandards@gov.wales](mailto:housingqualitystandards@gov.wales)

## **Additional copies**

This summary of responses and copies of all the consultation documentation are published in electronic form only and can be accessed on the Welsh Government's website.

Link to the consultation documentation: [Welsh Housing Quality Standard 2023 | GOV.WALES](#)

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Consultation questions		Welsh Government response and action
Q1	Do you agree with the expanded definition of social housing?	<p><b>WG response:</b> whilst there was overall support for the definition, we acknowledge that further clarity could be introduced.</p> <p><b>Action:</b> the wording of the definition will be strengthened to provide further clarity on properties within scope of the definition.</p>
Q2	Do you agree that the proposed Standard goes far enough to improve the quality of social homes in Wales?	<p><b>WG response:</b> we note that overall respondents felt the standard did go far enough however, the issue of damp and mould could be strengthened.</p> <p><b>Action:</b> the wording in element 1b is to be strengthened to include persistent condensation.</p>
Q3	Do you agree that the proposed Standard covers all the key areas that you would expect?	<p><b>WG response</b> – the majority of the respondents agreed with the scope of the standard, however, we note the concerns around Part 3.</p> <p><b>Action:</b> Part 3 of the standard will be updated to reflect the planned approach.</p>
Q4	It is proposed that social homes in Wales should comply with the Standard by the end of 2033. Do you agree with this timescale?	<p><b>WG response:</b> we acknowledge that many respondents found the timeline challenging in relation to Part 3 of the standard and have therefore revised this section.</p> <p><b>Action:</b> Part 3 of the standard will be updated to reflect the planned approach.</p>
Q5	Appendix 5 sets out the dates by which each element in the proposed standard should be met - Are these reasonable?	<p><b>WG response:</b> whilst we accept that some respondents would like to see faster implementation, the identified barriers to achieving these were significant.</p> <p><b>Action:</b> Part 3 of the standard will be updated to reflect the planned approach.</p>
Q6	Do you agree that the proposed Standard places sufficient obligations on landlords to ensure they meaningfully engage with tenants about planned works to their homes?	<p><b>WG response:</b> we accept that whilst this obligation is implicit within the standard it needs to be strengthened.</p> <p><b>Action:</b> the standard will be strengthened in relation to the requirement for landlords to undertake effective tenant engagement.</p>

Q7a	Higher standards usually mean higher costs. As a landlord what specific challenges do you see for your own organisation in complying with the proposed Standard?	<p><b>WG response:</b> WG acknowledges that the ambitions as set out in the proposed standard are challenging and a significant amount of funding will be required to achieve them. Reaching the targets within the standard will be a long-term commitment.</p> <p><b>Action:</b> In the short term, funding is available from the Optimised Retrofit Programme and will be in the region of £270m over this term of government and is available to all landlords to help with the decarbonisation journey. This financial year (2023/24) £70m has been indicatively allocated to landlords on a formula funding basis and there is a commitment for a further £70m next year.</p> <p>The planned approach to Part 3 of the Standard will alleviate some of the funding issues and WG is committed to working with the landlords to explore future avenues of funding over the coming years.</p>
Q7b	Non-Social Landlords: What financial challenges do you see could be faced by social landlords in complying with the proposed standard?	<p><b>WG response:</b> WG acknowledges that the ambitions as set out in the proposed standard are challenging and a significant amount of funding will be required to achieve them. Reaching the targets within the standard will be a long-term commitment.</p> <p><b>Action:</b> In the short term, funding is available from the Optimised Retrofit Programme and will be in the region of £270m over this term of government and is available to all landlords to help with the decarbonisation journey. This financial year (2023/24) £70m has been indicatively allocated to landlords on a formula funding basis and there is a commitment for a further £70m next year.</p> <p>The planned approach to Part 3 of the Standard will alleviate some of the funding issues and WG is committed to working</p>

		with the landlords to explore future avenues of funding over the coming years.
Q8	Does the proposed Standard strike the right balance between being bold and achievable?	<p><b>WG response:</b> whilst some disagreed with this statement, others agreed – this is a reflection of the range of stakeholders. Significant objections were raised in relation to Part 3.</p> <p><b>Action:</b> Part 3 of the standard will be updated to reflect the planned approach.</p>
Q9	In the context of the current cost of living crisis, what do you think could be added to the proposed standard to further mitigate poverty?	<p><b>WG response:</b> suggested responses fell outside the scope of the standard. The Affordable warmth element addresses the issue with the properties but has no influence over things like incomes.</p> <p><b>Action:</b> No change proposed to the standard – see spreadsheet for further information.</p>
Q10	Should anything be added to the Proposed Standard to make homes safer and more secure?	<p><b>WG response:</b> suggested responses fell outside the scope of the standard.</p> <p><b>Action:</b> No change proposed to the standard – see spreadsheet for further information.</p>
Q11	Do you agree that SAP/EPC is the best current measure to assess the energy efficiency of social homes?	<p><b>WG response:</b> no significant alternatives were suggested, and SAP remains the industry standard and WG will work with the UK government to understand updates to the SAP model.</p> <p><b>Action:</b> No change proposed to the standard – see spreadsheet for further information.</p>
Q12	If SAP/EPC is the measure used, do you agree that SAP 92/EPC A should be the target for homes?	<p><b>WG response:</b> WG acknowledges that whilst concerns raised in relation to this target are valid, they are not within the scope of the standard. Work needs to include tenant engagement.</p> <p><b>Action:</b> Part 3 of the standard will be updated to reflect the planned approach.</p> <p>Tenant engagement requirements will be strengthened within the standard.</p>

Q13	Carbon emissions from homes must be minimised (minimum of EIR 92). Do you agree that SAP/EIR is the right measure, currently available, to assess carbon emissions from homes?	<p><b>WG response:</b> There is no metric to undertake a whole life cycle approach and we accept that SAP is an evolving standard, and the standard will be updated to reflect changes in the SAP modelling in the future.</p> <p><b>Action:</b> No change proposed to the standard – see spreadsheet for further information.</p>
Q14	If SAP/EIR is to be the measure used, do you agree that EIR 92 should be the target for homes? If no, what target would you suggest is used and why?	<p><b>WG response:</b> WG believes the revised planned approach to Part 3 of the standard will introduce flexibility and address a lot of issues raised. The EIR bands are too wide for the standard to be used in isolation and using the scores provides more granularity, however, the bands will also be introduced to provide consistency. WG is working with the UK government in the carbon offsetting arena to allow landlords to gain access to financial markets for carbon trading.</p> <p><b>Action:</b> Amend the standard to include bands in the EIR score.</p> <p>Carbon balancing guidance will be produced alongside the standard</p>
Q15	In order to reduce carbon emissions, landlords should plan to stop installing fossil fuel fired boilers to provide domestic hot water and space heating from 2026 onwards. Do you agree with this date?	<p><b>WG response:</b> in response to concerns, the 2026 deadline is no longer in the standard. The revised approach to Part 3 will require each landlord to submit a plan and WG will oversee these plans.</p> <p><b>Action:</b> Part 3 of the standard will be updated to reflect the planned approach.</p>
Q16	Landlords must carry out a Whole Stock Assessment and produce Target Energy Pathways for their homes. The Target Energy Pathway refers to a plan to optimise energy efficiency for each home. Do you agree that 3 years is sufficient time to develop these pathways for each home the standard applies to?	<p><b>WG response:</b> WG accepts the challenges around financial and skilled resources in undertaking these and will continue to work with the sector to address them.</p> <p><b>Action:</b> Guidance on the Target Energy Pathways to be produced with the standard.</p>



Q17	All measures recommended through the Target Energy Pathway must be implemented. Do you agree this is the right approach?	<p><b>WG response:</b> the WG's Optimised Retrofit Programme will provide evidence on what works and lessons learnt will be disseminated through the Hwb. Tenant engagement is integral to the success of the standard.</p> <p><b>Action:</b> Part 3 of the standard will be updated to reflect the planned approach.</p> <p>Specific guidance on Target Energy Pathways will also be included with the standard.</p> <p>Tenant engagement requirements will be strengthened within the standard.</p>
Q18	Do you agree with the dates within the example set out in 3d?	<p><b>WG response:</b> the revised approach to Part 3 will introduce flexibility and address the issues raised.</p> <p><b>Action:</b> Part 3 of the standard will be updated to reflect the planned approach.</p>
Q19	The proposed Standard sets out that minimising carbon emissions from homes can be achieved by balancing the performance of homes with a high carbon footprint, against more efficient homes. Therefore, the proposed Standard demands Net Zero from the whole housing stock, rather than Net Zero for individual properties. Do you agree with this approach to achieving Net Zero for the social housing stock?	<p><b>WG response:</b> we acknowledge that some hard-to-treat homes will be more difficult to tackle, however, the standard is about equity across all homes and landlords plans will need to demonstrate they are tackling this issue.</p> <p><b>Action:</b> Part 3 of the standard to be revised to include the installation of smart meters in homes.</p> <p>Guidance on Carbon Balancing to be included in the standard.</p>
Q20	Measures to improve water efficiency and alleviating water poverty must be installed when replacing fittings and fixed appliances. Are the new water efficiency requirements included in the proposed Standard sufficient?	<p><b>WG response:</b> this element is to be tackled through landlord's programme of works to alleviate any intrusive activity to tenants.</p> <p><b>Action:</b> No change proposed to the standard – see spreadsheet for further information.</p>
Q21	At change of tenancy all habitable rooms (bedrooms and living rooms), staircases and landings located within the home should	<p><b>WG response:</b> WG accepts that there is some misunderstanding around this element, and this will be addressed.</p>

	<p>have suitable floor coverings. Tenants have told us how important flooring throughout their home is. Do you agree with the inclusion of the new flooring requirement at change of tenancy?</p>	<p><b>Action:</b> Strengthen the wording of element 6b to improve clarity.</p>
Q22	<p>Please use this space to raise anything else about the proposed Standard that you feel should be considered, excluding funding issues.</p>	<p><b>WG response:</b> Comments to this question have been added to the relevant section and included in the responses above</p>
Q23	<p>We would like to know your views on the effects that the Welsh Housing Quality Standard 2023 would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How positive effects could be increased, or negative effects be mitigated?</p>	<p><b>WG response:</b> we recognise the importance of tenants being able to communicate with social landlords in the language of their choice and will continue to explore any positive impact the standard can have on the Welsh language.</p> <p><b>Action:</b> Publish the standard as a HTML document in addition to other formats.</p>
Q24	<p>Please also explain how you believe the proposed Standard WHQS2023 could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.</p>	<p><b>WG response:</b> WG will continue to explore any positive impact the standard can have on the Welsh language.</p> <p><b>Action:</b> Publish the standard as a HTML document in addition to other formats.</p>

## **Appendix 1**

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Spreadsheet of public consultation responses and Welsh Government's policy position and suggested changes to the standard.

<https://www.gov.wales/sites/default/files/consultations/2023-09/policy-responses.xlsx>

## **Appendix 2 – the planned approach.**

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The area of biggest change to the standard is in Part 3, the section on Affordable Warmth and Decarbonisation. The Minister has agreed a planned approach is to be adopted and this is outlined below.

All landlords will be required to produce an 'Affordable Warmth and Decarbonisation Plan' within 3 years from the launch of the standard.

The Plan will set out when the landlord will achieve the targets of an Environmental Efficiency Rating (EER) of 92 (which equates to an EPC A) and an Environmental Impact Rating (EIR) of 92 for their housing stock.

Guidance will be provided by Welsh Government which will set out how the Plan is to be produced.

The Plan will include a Whole Stock Assessment (WSA) of all the landlords' properties, and this will outline the current EER and EIR ratings of each of their homes.

Landlords will then need to produce a Target Energy Pathway (TEP) for each home which will outline what they need to do to that property to achieve the required targets. The TEP will also include information on the timings of the improvements.

In addition to the above, landlords will be expected to ensure that all their homes reach a fabric-based EPC band C by 2029.

Welsh Government officials will assess the plans and the evidence provided to ensure it indicates a viable timetable to implement the required improvements to achieve the targets within the standard.