



## WHQS 2023 Consultation Response Form

### By TPAS Cymru July 2022

TPAS Cymru as the Tenant Engagement organisation for Wales welcomes the opportunity to contribute to the WHQS2 consultation. We have taken the opportunity to consult with tenants on the standards of the homes they live in.

We recognise the success of the original WHQS in raising standards and recognise these new standards seek to build on the principles of a secure, warm place to live by addressing key climate change objectives.

We have always supported the goals set out by Welsh Government to reach the Net Zero target by 2050, as we believe that a NetZero Wales is more sustainable Wales, which in turn creates more resilient communities. These goals are interlinked with other issues taking place in Wales such as fuel poverty and more recent media attention on damp & mould.

We recognize the size of the financial and operational challenge and that significant costs are needed to reach this goal together. We urge Welsh Government to seek opportunities to engage on financing this challenge and improve the Welsh supply chain and provide prosperity opportunities for Wales.

Our response to the WHQS is based on:

1. Four online sessions with tenants and front-line staff focused on WHQS2 (3 with WG staff present)
2. Nine sessions run during our Net Zero Week, which took place from June 13<sup>th</sup> to June 17<sup>th</sup>. During Net Zero Week, we discuss in detail subjects like Retrofit, technologies like IES, tenant engagement so far, tenant experience and what net zero housing means.
3. Tenant Pulse surveys on What Matters in your home (Oct 21) Energy Efficiency & NetZero (April 21 and July 22)
4. Equally important, we are continually engaging with tenant groups, staff etc within the sector on specific subjects such as flooring, damp & mould and energy efficiency.

We acknowledge there are concerns in the sector surrounding the ten-year period goal to become Net Zero in social housing, and we have observed that the entire sector is not fully bought in on this goal. We see some landlords who are already taking early positive steps, but there some who are adopting a 'wait and see' approach. If social housing is to achieve these goals or any revised goals, there needs to be more co-ordinated collective effort with greater shared learning -not just within technical teams but with tenants and wider stakeholders.

We believe wider clarity is needed on the standards. We have spoken to technical staff within RSLs who demonstrated to us with SAP modelling that a target of NetZero and EPC-A can be contradictory. ie you can sometimes achieve EPC A easier with a fossil fuel boiler than with a heat pump. Similarly, you can achieve NetZero but sometimes not get higher than EPC-B.



Tenant response has been mixed regarding Net Zero goals. In this cost of living crisis, tenants want lower energy bills, but initial feedback have been mixed. They have expressed concerns about feeling like guinea pigs, with untried methods, technologies and solutions being installed in their home. For the Net Zero agenda to succeed, there needs to be much more transparency and focus on the tenant experience. We recognise that is what ORP1/2 set out to do, but they share learnings have currently within in a too small circle.

The final point is that social housing tenants have fed back in sessions that they do not want to be treated differently. They want to see fairness and equity across housing tenures. Why should social housing tenants be restricted on flow of a shower or capacity of a bath, or the type of cooker they have when this doesn't apply to private tenants or homeowners. Building standards should apply to all in the fight against climate change.

## QUESTIONS

**Question 1:** The definition of social housing used in the proposed Standard has been expanded to include a wider range of properties:

'The Standard [WHQS2023] applies to all self-contained properties owned and managed by local housing authorities (LHA's) under Part 4 of the Housing (Wales) Act 2014 and registered social landlords (RSL's) who are regulated by the Welsh Government. It includes intermediate rent properties and properties owned for the purposes of social housing by Local Authorities not in a Housing Revenue Account.'

Do you agree with this definition?

YES

However, we are unsure from the definition on whether that includes shared ownership and extra care homes managed by social landlords

**Question 2:** Having a high-quality home has a positive impact on health and wellbeing.

Do you agree that the proposed Standard goes far enough to improve the quality of social homes in Wales?

YES

Yes, we agree that the Standard will improve the quality of social homes in Wales. Tenants recognise that high quality homes do have a positive impact on health and well-being. This can be seen especially in new build low carbon homes where the tenant feedback has been very positive. The challenge is retrofitting existing homes and answering question about how to complete this with little disruption on the tenants and ensuring they have lower energy bills. Tenants have welcomed: 1). The Welsh Government building on already existing standards, 2) Initiatives that help with tenant well-being in social homes, 3). Water efficiency and flooring and 4). Standards that should help tackle issues damp & mould due to underheating, poor insulation etc.



**Question 3:** Do you agree the proposed Standard covers all the key areas that you would expect?

NO

There are four things raised in our consultations that are not covered under the proposed Standard:

- 1). Broadband connectivity
- 2). Electric vehicle charging

The third and fourth only applies to tenants who have a garden area.

- 3). External power supplies. External power supplies can be crucial for those who may need to plug in an outdoor device like power tools and an electric scooter or other device and cannot inside.

- 4). Outside taps that can be used to water plants.

There has been concerns raised those new homes are being built or planned under new WDQR that will not meet these new WHQS standards. This includes S106 homes. This needs to be aligned quickly to avoid further retrofit costs.

**Question 4:** It is proposed that social homes in Wales should comply with the Standard by the end of 2033. Do you agree with this timescale?

YES

TPAS Cymru welcomes the challenging target that has been made in response to the climate emergency. But, in order to achieve this goal, the Welsh government and housing providers need to work together urgently to figure out how this can be achieved on 2 key issues - funding and resources. We are seeing a mixed response across the sector; some are fully supportive and others moving slowly. Welsh Government need to work with stakeholders to develop funding and resource plan to action this goal. Greater focus on tenant experience is also needed to capture tenant experience to date and awareness of new solutions that will be put in their home. We can help with that.

**Question 5:** Appendix 5 sets out the dates by which each element in the proposed Standard should be met.

Are these reasonable?

Unable to confirm

We are not best qualified to comment on this. We commend efforts of quicker wins such as water saving and floor installation and believe that completing this on more homes will be beneficial for tenants. The tenant experience to date is that is that fabric first must be done before options such as heat pumps. The second challenge we believe that needs to be resolved is Do RSLs do 'fabric first'



for all first or do whole homes completely in one go, to avoid distribution, education, second round of costs.

**Question 6:** 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?

NO

There wasn't much to comment on and the requirement is currently vague and weak. This needs significant strengthening. TPAs Cymru would like to work with stakeholders to help define this better.

This is very different to WHQS1. Upgrading windows, bathrooms, kitchens etc requires a lower level of engagement and require lower levels of ongoing support tracking of experience. WHQS2 involves significant changes in home living.

Tenant engagement is a crucial part of these works in tenants' homes, and it is beneficial for landlords/contractors etc if there is good support for tenants in advance to have these works done to their homes. This is especially significant when deciding to put in new lower carbon technology and additional operations into homes. During tenant engagement sessions we learned:

- 1) There is not enough educational engagement in advance on regarding what to expect when getting new systems such as heat pumps in the house and what support will come once the fitters have left and most importantly the change in lifestyle needed (pre-heating and limiting family use of a set cylinder volume of hot water to shower compared to always on combi boiler). Tenants have shared a concern around costs and affordability of new heating systems and the implications of having to buy new appliances.
- 2) Tenants are currently unaware of the significant upheaval that comes with installation for these new systems, and this leads to disappointment/upset when there may be material consequences of the installation that are not 'made good', and they are unsure of their rights.
- 3) Regarding the new technologies, these inevitably have new ways of operating/living, greater engagement for tenants prior to instalment to help them learn how to use things such as an air source heat pump or an IES. We have learnt from failings in previous damp mechanical/technical solutions that the training/tracking needs to be not just on those living in the property at time of the installation but also tenants who move into a void property later with these new systems when their previous home did not have them?
- 4) Being honest about the shortcomings and how successful outcomes can be achieved will help tenants understand how their home may or may not change. Landlords must be held accountable for informing their tenants on planned works for their homes and they must participate in engaging the tenants before and after these works are planned and completed.

**Question 7a:** Higher standards usually mean higher costs.

[To be asked only of Social Landlords from selection above]



As a landlord what specific financial challenges do you foresee for **your own organisation** in complying with the proposed Standard?

Non-applicable

#### **Question 7b** Non-Social Landlords

What financial challenges do you see could be faced by social landlords in complying with the proposed standard?

How this is going to be funded is the big question now. Previously, kitchens and bathrooms were costly but were part covered by ongoing replacement programmes. Tenants have expressed concern that costs will be borne by significant rent rises that are going to be placed on them with no guarantees of tenant benefit in terms of energy bills. Initially, Landlords were proposing to raise rent in exchange for lower energy bills, but there have not been sufficient data to confirm this premise and some tenants have been left disappointed.

**Question 8:** Does the proposed Standard strike the right balance between being bold and achievable?

Unable to confirm

A proposed standard is certainly bold, welcomed and encouraged. We welcome Wales taking a lead. However, achievability is something we are not best qualified to say. We see pushback from landlords already and have observed significant differences in speed/approaches from landlords that challenge these deadlines. The challenges of finance, tenant engagement and supply chain need significant sector collaboration to work out who to achieve this standard.

**Question 9:** 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?

- Identify homes most impacted by cost of living crisis and/or damp & mould
- Bring forward the fabric first deadlines to speed up the process for EPC rating minimums.
- People who are working from home or rely on internet connection are may trouble when trying to find employment because they may not have a suitable connection to carry out online interviews. Tenant's homes need to have better broadband connection, this contributes to mitigating poverty.
- Bring forward the deadlines for flooring to be done for voids.

#### **Part 2 of the Standard: Homes must be safe and secure**

**Question 10:** Should anything be added to the Proposed Standard to make homes safer and more secure?

YES



Session feedback requested better clarity of the standards of windows and doors in homes, pertaining to safety?

**Part 3 of the Standard: Homes must be affordable to heat and have minimal environmental impact.**

Element 3a – Heating systems must be reasonably economical to run and capable of heating the whole of the home to a comfortable level in normal weather conditions (minimum of SAP 92- EPC A).

**Question 11:** Do you agree that SAP/EPC is the best current measure to assess the energy efficiency of social homes?

YES

Whilst there may be better technical standards to measure against, EPC has some consumer understanding, making it better to understand by tenants. Any changes to the measurement needs to be clear to tenants so that they can make an informed decision on their property or potential property. The measurement also needs to work for agents and other stakeholders so they can inform tenants about the energy efficiency of the property that they are moving into.

**Question 12:** If SAP/EPC is the measure used, do you agree that SAP 92/EPC A should be the target for homes?

UNSURE

The scale and principle of EPC A is easier to understand for tenants and has been used to set out the aims of the entire NetZero agenda. We have also spoken to technical staff within RSLs who demonstrated to us with SAP modelling that a target of NetZero and EPC-A are contradictory. ie you can sometimes achieve EPC A easier with a fossil fuel boiler than with a heat pump. Similarly you can achieve NetZero but not get higher than EPC-B. Are we seeking NetZero or EPC-A? or does EPC scale need reform? This is for more qualified people to consider but the goals need to be clear for tenants and not lost technicalities of SAP points.

**Question 13:** Element 3b - 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?

TPAS Cymru is not qualified to answer this question. We repeat the information and measurement used needs to be easy for tenants to understand and allow them to make an informed decision about the home that they are moving into or living in. Tenants also need to be able to know what their property is currently rated at and what their home's pathway to zero is .

**Question 14:** If SAP/EIR is to be the measure used, do you agree that EIR 92 should be the target for homes?



TPAS Cymru is not qualified to answer this question. We repeat the information and measurement used needs to be easy for tenants to understand and allow them to make an informed decision about the home that they are moving into.

**Question 15:** 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?

No

The switch from fossil fuel boilers needs to happen, but heat pumps can only go in once a property has had comprehensive 'fabric first' work done first. Tenant feedback to date shows without it, the tenant is significantly worse off. That can't happen.

Without fabric first, a heat pump boiler must be supplemented with solar pv, when possible, in order to minimize the cost for tenants.

Solar panels are a technology that tenants are most familiar with, and these should support heat pumps either individually or via community energy.

**Question 16:** Element 3c - 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?

YES

To have any chance of achieving these goals in ten years, assessments and surveys must be done within the proposed three years. This is vital to get sector and landlord plans, costs and resources,

If this target fails, its likely the wider targets will fails. The sector needs to address this. We saw action post-Grenfell in standards and training of Fire Risk assessors. Similar intervention is needed here. Pushing back dates for completion will result in a failure of meeting NetZero goals.

Are there sufficiently trained resources to carry out NetZero goals and how do we increase the supply? Others are better qualified to answer.

**Question 17:** Element 3d - All measures recommended through the Target Energy Pathway must be implemented.

Do you agree this is the right approach?

Unsure

As discussed above in Q15, it appears that step 3 heat pumps could be installed without step 2 fabric - if we understand that correctly, that would concern us.



**Question 18:** Do you agree with the dates within the example set out in 3d?

No

We need to align fabric and heat pumps to avoid making the tenant worse off.

**Question 19:** 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?

YES, NO

If no, what would you suggest instead?

**Question 20:** Element 3f – 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?

We welcome improvements to water efficiency and believes it's a positive step, but tenants gave very clear feedback that this applies to them then it should apply to all homes from the same deadline – why should social housing tenants be restricted to capacity of a bath but homeowners not. Same standards should apply.

**Question 21:** Element 6b – At change of tenancy all habitable rooms (bedrooms and living rooms), staircases and landings located within the home should 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?

YES,

TPAS Cymru's 'Floored' report with Tai Pawb achieved significant tenant and sector endorsement and demonstrated the need for this requirement. Whilst we expect some landlord resistance, we have chaired a number of successful events to explore options for achieving this requirement that don't always have significant impact to budgets. Flooring is essential for a tenant's home and is needed. There is not a single solution and we are pleased a number of successful models have been developed.

**Question 22:** Please use this space to raise anything else about the proposed Standard that you feel should be considered, excluding funding issues.

Whilst WHQS1 achieved great things, one of the disappointments for TPAS Cymru has the size of the 'acceptable fails'. There didn't feel enough collective scrutiny, challenge and consequences of acceptable fails at local engagement, board room, and regulation level.





Also individual tenants and tenant groups were not sufficiently made aware and unable to challenge. Learning from this opens up 2 issues we feel needs addressing:

1) There are inevitably some homes in Wales that will be unable to be retrofitted to these new standards. We acknowledge that. In that case, what is the plan of action for the tenants and their homes? If they are unable to benefit from EPC A living and energy savings, do they receive a rent reduction? And what else does landlord need to do to offset these carbon emissions to achieve NetZero.

2) Challenging Acceptable fails – there needs to be much greater transparency, and regulations in place from survey phase so that tenants and tenant groups can understand and challenge the plan for their home. This challenge and transparency needs to be adopted right up into the board room and into regulation

**Question 23:** 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?

Welsh language should be treated with equal status to English for those wishing to live through their preferred language. That includes communications, engagement, and training. With regard WHQS2, key to this is have local trained labour force who have resources who can communicate in Welsh including tenants technical questions and how to operate the systems.

We are excited by supply chain initiatives like Adra's partnership in Penygroes. This should be supported and accelerated to not just improve local supply chain but also provide Welsh language support through a vibrant skilled local workforce.

There needs to be procurement guidance to ensure Welsh speaking resources are available. Failing to do so would be a disservice to those who are Welsh speaking.

**Question 24:** 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.

See above response.

**Question 25:** We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

They most important theme to emerge from our consultations with tenant is that they have expressed very strongly that they do not want to be 'experimented on' to see what works and what



does not, it is dehumanizing and intrusive to have workers constantly coming in and out of their homes as test subjects. Net Zero is about doing and making good, for all of Wales.

We need to see other tenures doing their bit and sharing the experience and learnings. Same standards should apply.

Going Net Zero also means significant lifestyle changes for tenants, and Welsh Government needs to keep this in mind when looking to complete works on homes. We have observed that many tenants have never heard about any of these technologies, and as such, there needs to be awareness of how Net Zero will change the normalities of people's lives. They can't simply be installed and left to their own devices.

TPAS Cymru is happy to have our response to the WHQS published. as part of a community resource. If there are any further questions, our contact details are below:

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July 2022