

# Agenda – Climate Change, Environment and Rural Affairs Committee

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Meeting Venue:

Committee Room 3 – Senedd

Meeting date: 22 January 2020

Meeting time: 09.20

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## Pre-meeting (09.20–09.30) PRIVATE

### 1 Introductions, apologies, substitutions and declarations of interest

### 2 Fuel Poverty – evidence session 3

(09.30–10.30)

(Pages 1 – 49)

Shaun Couzens, Chief Housing Officer – Caerphilly County Borough Council

Gaynor Toft, Corporate Manager, Housing – Ceredigion County Council

Representative – Swansea Council

Attached Documents:

Research brief

Paper – Caerphilly County Borough Council

Paper – Ceredigion County Council

Paper – Swansea Council

## Break (10.30 – 10.40)



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### **3 Fuel Poverty – evidence session 4**

(10.40–11.40)

(Pages 50 – 81)

Matthew Kennedy, Policy and Public Affairs Manager – Chartered Institute of Housing

Bethan Proctor, Policy and External Affairs Manager – Community Housing Cymru

Tim Thomas, Policy Officer – Residential Landlords Association

Attached Documents:

Paper – Chartered Institute of Housing

Paper – Community Housing Cymru

Paper – Residential Landlords Association

### **4 Paper(s) to note**

#### **4.1 Correspondence from the Chair of the Committee on Assembly Electoral Reform – invitation to submit views**

(Pages 82 – 83)

Attached Documents:

Letter

#### **4.2 Correspondence from the Minister for Environment, Energy and Rural Affairs – Inter–Ministerial Group Environment, Food and Rural Affairs (IMG EFRA) meetings**

(Page 84)

Attached Documents:

Letter

### **5 Motion under Standing Order 17.42(vi) to resolve to exclude the public for the remainder of the meeting**

**PRIVATE (11.40 – 12.00)**

- 6 Consideration of evidence received under items 2 and 3 of today's meeting**

Document is Restricted

**Cynulliad Cenedlaethol Cymru | National Assembly for Wales**

**Y Pwyllgor Newid Hinsawdd, Amgylchedd a Materion Gwledig**

**Climate Change, Environment and Rural Affairs Committee**

**Ymchwiliad i Dlodi Tanwydd | Inquiry into Fuel Poverty**

**FP 08**

**Ymateb gan : Cyngor Bwrdeistref Sirol Caerffili**

**Evidence from : Caerphilly County Borough Council**

## **The scale and impact of fuel poverty in Wales**

WG have already indicated that approximately 12% of households remain in fuel poverty, which is linked to reducing income levels, increasing living costs and increasing fuel costs. The figures are disappointing when considering all the investment being made into homes within Wales, particularly as we near the end of the WHQS programme nationally, but it is accepted that this is a problem in the private sector as well as social housing.

Fuel poverty will obviously impact on people's wellbeing, health and the living environment and we hear of incidents whereby households need to make a choice of whether to put food on the table, buy clothes for the children or heat the home. Poverty can also result in increased instances of anti-social behaviour and crime outside the home, impact on children's education and contribute to problems with condensation, dampness and respiratory problems within the home. This results in increased resources being called upon in the public sector including the health service, social services and housing services to name a few.

## **Why the WG failed to meet its statutory target of eradicating fuel poverty in Wales by 2018**

This is a question that WG should answer but a number of reasons could include the following:-

- Changes to the welfare system which have been outside of WG's control.
- Climate change.

- Problems with previous initiatives aimed at improving thermal efficiency of homes e.g. cavity wall insulation, air source heat pumps, solar panels, technology.
- Cost of energy efficiency work and new technology.
- Cultural and intergenerational issues with many failing to engage to seek employment to increase income.
- Lack of understanding, training/educating of households to optimise the use of energy and new technologies within the home.
- Limitations of existing housing stocks which fail to lend themselves to some of the more cost effective energy efficiency solutions.
- Funding has been an issue whilst organisations have focused on achieving WHQS which has perhaps limited the extent of energy efficiency work undertaken in the public sector. Also delays have been incurred through the bidding and approval process of some schemes e.g. Arbed, together with tight timelines for completion which has resulted in work being undertaken in the worst weather periods of the year, work being rushed to meet the deadline leading to quality issues.
- Designing with energy efficiency in mind is far easier than retrofitting and more cost effective.
- Energy companies need to play their part and increase the offer of 'green' energy and reduce costs to customers.
- The increase in reliance on the private rented sector, particularly for low income households and the reluctance of some landlords to invest in energy efficiency measures that would benefit their tenants.
- The lack of success of the 'Green deal' initiative.

### **How WG action to date has helped to combat fuel poverty, in particular, the impact of the Warm Homes Programme and WHQS**

The energy efficiency initiatives introduced and supported by WG such as NEST, Arbed and WHQS, would clearly have had a positive impact on addressing fuel poverty, but the actual impact is not known at a local level as it is only available on a national level.

Support is provided across both public and private sector with advice, financial assistance or specific schemes and more recently this has looked at

an holistic approach across an area which is of great assistance. It is often not practical to try to target social or private housing in isolation.

### **How the WG's successor to the fuel poverty strategy, should differ from it's 2010 strategy**

WG need to consider the cost of retrofitting to improve energy efficiency as in some cases the cost can be higher than the property value.

We agree with the fabric first approach where possible, particularly for the elderly and social housing, as many appear to struggle with new technology or fail to use systems correctly which can actually increase their costs or lead to other problems as mentioned above.

A number of initiatives have been tried and tested, is there clear evidence to suggest what has worked well and what has not? For example we have used air source heat pumps and electric heating systems within Caerphilly, but we have encountered problems with both resulting in their replacement. EWI seems to be applied extensively nationwide, but again the longterm sustainability of this is not known and we are also encountering problems with some EWI installations within Caerphilly.

There is real concern in relation to the delivery of new social housing in particular that the increased requirement for improved quality, DQR, fire safety, SABS and energy efficiency will impact on the viability of some sites, with the pressure being applied to the level of social housing that can be provided.

The attainment of carbon neutral homes will be extremely difficult without the contribution from energy providers to deliver green energy.

There needs to be a consensus on the definition and interpretation of 'carbon neutral', 'carbon positive' etc across organisations.

Can energy targets for homes be offset by other measures e.g water recycling, planting trees particularly for some sites or properties which may struggle technically and financially to deliver on the targets?

What research has taken place to determine the carbon contribution of the delivery process e.g. obtaining and transportation of raw products, manufacturing of EWI, transportation and storage of manufactured products, installation, maintenance and how long it would take to turn this into a benefit?

**What steps the WG should take to ensure that new build homes, as well as existing homes, are highly energy efficient to prevent them causing fuel poverty in the future.**

Suitability – as we have found with CWI – the solution might not be the right one for the geographical area. It is important that the right solutions are chosen for the right geographical area.

The use of technology needs to be easy to understand and user friendly, taking into account all prospective and existing households

Consider the impact that improved quality and energy efficiency will have on the number of homes being delivered

Review schemes completed under the IHP and establish what has worked well, if it is affordable and if costs can be reduced to make the wider roll out affordable

Energy providers and manufacturers need to play their part in contributing towards carbon neutral homes

The whole construction and retrofit journey should be taken into account, as well as the life time use of the home to determine energy efficiency.

Provide unambiguous definitions of terms such as carbon neutral for use across the sector so that accurate comparisons can be made.

Consider options for dealing with existing homes which may be problematic from a practical, technical and financial perspective.

Consider how the impact of fuel poverty can be measured and provide clear and consistent guidance on how it can be tackled, as this is not purely a housing related issue.

Hard to treat properties are often easier to improve when the property is vacant. Could funding be made available to target such properties when these circumstances present themselves, e.g. internal insulation?

Improve energy advice and ensure this is targeted at those identified as potentially being in fuel poverty.

### **Scale and impact of fuel poverty in Wales**

The Housing Conditions Evidence Programme recently published detailed analysis of the fuel poverty estimates for Wales 2018. Key points from the analysis were:

- 155,000 households were living in fuel poverty (12% of all households);
- Private rented sector households were more likely to be fuel poor with 20% of these living in fuel poverty;
- 50% of single person households without children were living in fuel poverty;
- Households living in older properties are more likely to be fuel poor (20% of households living in pre 1919 dwellings were fuel poor);
- 21% of households living in properties with uninsulated solid walls were fuel poor;
- 30% of households in properties lacking central heating were fuel poor; and
- 43% of households living in properties with lower energy efficiency (EPC bands F and G) were fuel poor compared to 5% of households living in properties in bands B to C).

Evidence indicates that there is higher poverty in rural areas especially where they are off mains gas. Citizens Advice Research shows that 46% of households in Wales who are off mains gas are also in fuel poverty (against 26% in England).

In Ceredigion, 82.4% of properties are not connected to mains gas and these households are heavily reliant on more expensive forms of heating such as oil with the need for bulk purchases. Paying for such fuel is challenging amongst low-income households, leading to self-disconnection and under-use of

heating. 33% of the housing stock in Ceredigion is pre 1919 and these have the highest percentage of homes without central heating (16%). In 2015, 24.91% of Ceredigion households were considered to be fuel poor (total of 7643 households).

Importantly, the number of households in fuel poverty are greater than those officially recorded because some households are not spending greater than 10% of their disposable income on fuel bills as they are living in cold homes which they are under heating. A large number of households with one or two pensionable aged occupants on state pension are in fuel poverty and living in cold homes.

The impact of fuel poverty on a household can be substantial and this is in direct conflict with the well-being objectives of the Well-being of Future Generations (Wales) Act 2015. Poor quality and difficult/expensive to heat homes can contribute to feelings of isolation, loneliness and health issues that can come at an enormous cost to the NHS, Social Services and other public services.

Impacts include:

#### Lifestyle

The household live in a cold home that may be damp and have mould growth. Such conditions in the home can cause physiological and psychological impact on the householder. A household in energy debt and finding it difficult to pay future bills can experience a negative impact on their mental health, causing severe anxiety and an ever increasing circle of poverty. They may only be heating one room adequately therefore the whole family would spend their time together in this one room; this can impact on the dynamics of the family and evidence indicates that this can negatively affect children's education.

#### Social and Community Influences on Health

Feeling of isolation/loneliness as they are unable to invite family and friends to the home. Insufficient funding for leisure and enjoyment, and a feeling of being trapped within their own home.

### Mental well-being

Isolation, anxiety, depression and stress as well as possible addiction to various drugs/substances. Insufficient money to fund all essential bills. Lacking in confidence.

### Living and Environmental Conditions affecting health

A cold home can be damp with associated mould growth. This affects the air quality and may exacerbate any underlying respiratory conditions with the added cost to the NHS.

### Economic conditions affecting health

Lacking in confidence due to mental health associated with living conditions and lack of money. This may mean that occupants are unable to find employment and feel isolated. There can be a necessity to decide whether to heat the property or buy food for the family to eat.

### Access and Quality of Services

Lack of services in rural areas and households must rely on public transport. In rural areas public transport is infrequent and the bus stop may be a considerable distance from their home. Lack of internet access in the home to deal with everyday life and to assist children with their education is common.

### Why the WG failed to meet its statutory target of eradicating fuel poverty in Wales by 2018

WG Arbed Warm Homes scheme and the Nest (British Gas) scheme have helped in reducing the number of households in fuel poverty however this has not been sufficient for various reasons as listed below.

### Timescale

The schemes have had their flaws and as with the Arbed scheme, it was difficult for Local Authorities to deliver the schemes within the deadlines as the funding was only available for the financial year.

In Ceredigion we have been successful in 3 applications under Arbed 2 and 3. Notification of the funding was towards the end of autumn and delivery of the scheme was over the winter months. Due to the nature of the works (i.e. external wall insulation) this was difficult due to the product not being able to be installed/applied in poor weather and low temperatures. In addition to this, a large percentage of the homes were privately owned, therefore it was necessary to have additional lead in time for the home owners to see the benefits of the works included in the scheme and to agree to the works.

The schemes were run over a tight timeframe, from application stage, through the delivery and to completion in a matter of months (working to the end of the financial year). This was a difficult deadline to meet without the added problem of the inclement weather.

#### Local contractors

There was funding available from Welsh Government in the form of revenue to assist local Small Medium Enterprises (SMEs) to train and qualify in the installation of insulation/heating installations. However, this meant a large commitment on the part of the company with no promise of work over the future years. Every Local Authority had to submit an application for funding for the various schemes on a yearly basis through competitive bidding. There was no continuation/guarantee of work and therefore the contractors would not commit. In addition, due to the short delivery times the contractors would not be qualified in sufficient time to deliver the ongoing scheme. The added disadvantage is that local companies are not qualified to install the energy efficiency measures for private works or to engage in the conversation with the private owners encouraging the installation of energy efficiency measures. All the main contractors employed for the scheme were not Ceredigion based, although local contractors were used for some of the associated works (e.g. plumbing, electrician).

#### Area approach does not deal with the pockets of fuel poverty

Rural areas like Ceredigion have pockets of deprivation and not large areas, therefore using a street/area approach does not address the worst issues in the County. The application process should be based on a countywide area. Client applications would be received with a Test of Financial Resources

completed and hence targeting the individuals in greatest need and not the areas.

### Enabling Works

Enabling works due to poor housing was not covered by Arbed and Nest. Pointless to insulate the loft if the roof is leaking and cavity wall insulation cannot be installed if cavities are poorly pointed (thus allowing water ingress). There should be funding towards repair items to enable insulation works to be undertaken. Cost of loft insulation is low, however cost of ensuring roof is water tight is high therefore works cannot be undertaken. Home Improvement Loans are available but in the majority of cases where households qualify for the Arbed or Nest they would not satisfy the affordability check for the loan.

### Nature of the measures carried out

The original Arbed schemes concentrated on external wall insulation and this had a greater impact on the households. However, the more recent scheme targeted minor energy efficiency installations (i.e. loft and cavity wall insulation and heating systems). The majority of loft insulations have been carried out over the years and as most of Wales are an Exposure Zone 4 this means that cavity wall insulation is not suitable in the cavities. It is worth noting that there are new beads on the market for cavity wall insulation but clients need to be educated following the poor press received from the failed cavity fills already undertaken.

### Other influences on fuel poverty

Average Income levels are particularly low in the county and across Wales, and this is linked to the quality of employment opportunities such as part time working, self-employment. When this is combined with poor, difficult to heat homes, this increases the numbers of households in fuel poverty. Therefore it is our opinion that there needs to be greater links and awareness within employment and regeneration programmes of the importance of income maximisation as part of the provision of good quality employment opportunities. Furthermore, there has been insufficient emphasis within the national schemes run (Arbed, ECO, Nest) on the importance of behaviour change as well as income maximisation as part of these capital energy

efficiency schemes. We provide evidence below of how in Ceredigion we have blended both capital housing improvements with revenue funded behaviour change programmes linked to income maximisation and energy efficiency resulting in significant increases in household income. This is work that we have commissioned locally using the third sector Citizens Advice service. However, the difficulty with such schemes has always been that they are short term project funded and not integrated as part of the capital schemes, so happens in a piecemeal fashion depending on funding availability.

### **How WG action to date has helped to combat fuel poverty, in particular, the impact of the Warm Homes Programme (including Nest and Arbed) and the Welsh Housing Quality Standard**

WG have provided funding avenues for the installation of energy efficiency measures in properties in Wales in the form of Nest, Arbed and Home Improvement Loans. The works undertaken to date has resulted in a reduction of households in fuel poverty from 23% to 12% with the delivery of the schemes.

Funding that has been available for these improvements has had a positive impact on the households who have received the installations.

In Ceredigion alone, through the Arbed scheme, WG have funded:

#### Capital Projects:

- i) 2013–2015 – Llandysul. 109 external wall insulation and minor measures to the value of £1.3 million.
- ii) 2015–16 – Cardigan and Llanarth. 109 External wall insulation and minor measures to the value of just under £2 million.

#### Revenue Projects:

- i) 2014–16 Project Manager, EPCs and GDAs, Energy Advice and behavioural change advice and training of local contractors.

Other non–WG funding / initiatives have been secured including:

- National Grid and Community Interest Company, Affordable Warmth Solution (AWS) established a £150m Warm Homes Fund (WHF) designed to assist local authorities, registered social landlords and partnership organisations to address some of the issues affecting fuel poor households. Ceredigion County Council has been successful in obtaining funding from the Warm Homes Fund to install first-time central heating systems in properties that do not currently have full central heating systems, located in the Tregaron and hinterland area. The scheme is called Caron Cynes/Cozy Caron and eligible households must meet the following criteria:
  - The property must be energy inefficient.
  - The property must not have an existing full central heating system.
  - The household must be on low income and vulnerable **and/or** living in fuel poverty.
- Ceredigion County Council also backs the ECO 3 Flexibility Scheme. The aim of the scheme is to install energy efficiency measures in properties that are currently energy inefficient which in turn reduce households' fuel bills. Under ECO Flexibility, Councils can define their own criteria to help vulnerable people get funding towards heating and insulation upgrades in their homes. As such, a broader range of vulnerable people can be supported. Ceredigion County Council qualify households based on the information supplied on the application form and issue declarations for those who could benefit from improvements. Funding is available to owner occupiers and private rented tenants. To be eligible for inclusion of flexible eligibility in Ceredigion:
  - your home must be energy inefficient; and/or
  - the householder is;
    - a. spending greater than 10% of their income on fuel bills; or
    - b. on a low income and vulnerable to the effects of living in a cold property

Unfortunately, there is a missed opportunity with ECO flexibility because the funding is only available directly from OFGEM. This makes it difficult for Local Authorities to run and manage these schemes without any degree of local accountability to govern the quality of the installations, avoid cold calling on vulnerable residents as well as ensuring whether the objectives have been achieved in terms of bringing the household out of fuel poverty.

## How the WG's successor to the fuel poverty strategy (due for consultation in Autumn 2019) should differ from its 2010 strategy

### Countywide Scheme

Funding should be given to LAs to deliver an energy efficient scheme in-house with a means test to determine the worst cases and not make these area based. Rural areas lose out with area based schemes as they do not have large numbers in one area to substantially reduce costs. Also rural areas like Ceredigion have higher works cost due to its rurality and distance from M4 corridor.

### Enabling Works

Enabling works to be included to improve poor housing conditions prior to the installation of energy efficiency measures.

### Local Contractors

Local contractors should undertake the works thus enabling funding to be brought back into the local community. This would assist in raising incomes and bringing households out of fuel poverty. There needs to be continuation and a guarantee of work for local contractors so that they are prepared to invest time and money into the training. This would help to facilitate the development of skills and jobs in the local community.

### Longevity of programme

Ideally 3-5+ year programme to attract local contractors to become involved (long term programmes). If this is not possible then the flexibility should be allowed for LAs to either carryover funding across financial years, or provide funding in advance.

### Energy Efficiency and Income Maximisation Advice

The cause of fuel poverty is two-fold, namely cost of fuel and income. There should be a requirement for Energy Efficiency Advice and Benefit Entitlement Check. The fuel bills can be reduced through raising awareness of energy efficiency measures and current schemes, changing behaviour, switching energy provider/tariff, budgeting advice, discussing and reducing fuel debts

and assessing household eligibility for Warm Homes Discount. In some cases by reducing their fuel bills and increasing their income this may ensure that the households are brought out of fuel poverty.

Inclusion of Energy Efficiency and Income Maximising Advice to all receiving the heating and insulation measures under the various schemes available. This will ensure that the occupants are receiving the full benefit from the measures and bringing them out of fuel poverty. Ceredigion have run an advice scheme concurrently with the Arbed schemes in the past and have realised the benefits of this to the households.

#### Cold Weather plans for Wales

There should be a cross party group to tackle fuel poverty and improve energy efficiency together with the development of cold weather plans for Wales in order to address winter mortality.

#### ECO schemes: top-up grants/funding from Welsh Government (where schemes do not cover whole cost of the install).

Consideration to be given to top-up grants for ECO, etc. to bridge the gap between the amount of funding and the amount of grant aid available as not all schemes are fully funded. In the majority of cases the households may not be able to fund the difference themselves or via the Home Improvement Loan. Furthermore, revenue funding needs to be available alongside these capital schemes to ensure that effective programme management is in place and that income maximisation happens alongside the capital improvements.

ECO funding to be available directly to Local Authorities so that LAs can run/manage the schemes. This would give local accountability to govern the quality of the installations, together with the ability to assess whether the households receiving the installed measures have been brought out of fuel poverty.

#### Gas Networks

Working with Gas Networks in the area and providing funding for the installation of the boiler/heating system for the client. Possibly considering this for the able to pay as well to ensure maximum sign up – economies of

scale. Provision of free or low cost connections to the network for first time central heating customers.

#### Small Medium Enterprise (SMEs)

Training and continued improvement in energy efficiency knowledge/skills for advisors, installers, contractors, apprenticeships, etc. Map work against skills and identify gaps in the supply chain. This is also needed in response to the WGs drive to build additional zero carbon homes, as investment is needed to ensure the contractor base is ready to meet the challenges of such construction projects.

#### Deliver projects with Community Benefits

To include SMEs, apprenticeships, etc. and improvements to local community amenities. This will maximise the benefits of the money brought to the area by the works/scheme being delivered.

#### Better support for vulnerable customers at risk of disconnection

There are inconsistencies between suppliers. Self-disconnections by customers can be the result of lack of credit in payment meters, affordability, connection issues, forgetfulness and customer choice.

#### Proposed Log Books for each property

Welsh Government to fund Log Books for all residential properties to include details on the existing thermal measures, heating elements, etc. and a list of the required energy efficiency improvements required.

#### Bring energy efficiency and fuel poverty awareness into schools as part of their education/curriculum

#### What steps the WG should take to ensure that new-build homes, as well as existing homes, are highly energy efficient to prevent them causing fuel poverty in the future

There is cross linkages with this aspiration to the Affordable Housing Review recommendations.

It will be necessary to look at the carbon cycle of new development (cradle to grave approach) and construct sustainable homes. Planning and Building Regulations to include the necessity for all new builds and conversions to be a Band B on an EPC. These should include some form of renewable technology.

There is a need for a new generation of social housing with the creation of innovative housing at scale and pace, achieved through sustainable communities.

Social Housing to have a 10 year programme and Welsh Government funding to bring every home to EPC A (30,000 homes per year). Department for Business, Energy and Industrial Strategy (BEIS) have launched a whole house retrofit programme for social landlords, and this links with the Decarbonisation Proposal report recently published by WG.

Research into innovative measures and more Welsh Government funding for innovative pilot schemes.

Welsh Government to fund energy efficiency and renewable technology schemes for privately owned properties, both owner occupiers and private rented sector.

Need to deliver a holistic package for all tenures to encourage change.

## Cynulliad Cenedlaethol Cymru | National Assembly for Wales

Y Pwyllgor Newid Hinsawdd, Amgylchedd a Materion Gwledig

Climate Change, Environment and Rural Affairs Committee

Ymchwiliad i Dlodi Tanwydd | Inquiry into Fuel Poverty

FP 04

Ymateb gan : Cyngor Abertawe

Evidence from : Swansea Council

### 1. The scale and impacts of fuel poverty in Wales

1.1 In terms of the private sector, Wales still has the lowest average SAP rating of UK nations, impacting significantly on levels of fuel poverty. SAP ratings have improved over the last 10 years following various Welsh Government funding programmes such as NEST and Warm Homes Arbed schemes, aimed particularly at vulnerable, elderly, disabled, low income households in Wales. However the Welsh private housing stock is the oldest in the UK, predominantly pre1919 terraced solid wall properties, measures to date have not improved matters sufficiently.

1.2 The scale of the issue is outlined in the recent WG publication 'key statistical bulletin Fuel Poverty Estimates for Wales 29<sup>th</sup> August 2019'. The Authority have enquired whether these statistics can be broken down into Authority area but WG confirmed that this could not be done.

1.3 It must be recognised, that the current definition of fuel poverty is very broad and doesn't take into account a household's disposable income and actual energy spend. It is more a measure of poverty in general. A low income family might have access to discounts in other household expenditure e.g. Welsh Water HelpU, free TV licence, free bus travel, discounted leisure service membership, warm home discount, winter fuel payments. These other benefits could therefore mean that the fuel expense is manageable.

## **2. Why the Welsh Government failed to meet its statutory target of eradicating fuel poverty in Wales by 2018**

2.1 Austerity measures have exacerbated incomes of families living in Wales, leaving them with less money whilst the cost of living has continued to rise. Private rental costs between 2010 – 2015 rose by 15.2% whilst cuts to benefits and freeze on benefit uprating have significantly reduced income. For example, in 2011 the local housing allowance was reduced to the 30<sup>th</sup> percentile which has reduced the eligible rent figure that is used in calculating financial support (i.e. Housing Benefit) to help claimants pay their rent.

2.2 Uprating of benefit rates were changed in 2011, using retail price index instead of consumer price index and from 2016 benefit rates were frozen, affecting all working age claimants (with the exception of those who have limited capability for work related activity) particularly affecting those in low paid employment and those with children. In addition, there have been other significant cuts / removal of benefits including the reduction of support provided for childcare reduced from 85% to 70% within tax credits; the increase of the percentage of income taken into account when calculating entitlement to tax credits from 39% to 41%. The removal of the elements, including the 50+ and baby element, together with the abolition of the work related activity component within Employment and Support Allowance and the introduction of Universal Credit.

2.3 These cuts will have reduced income, thereby reducing the available amount of disposable income which would impact on the numbers of households experiencing fuel poverty.

2.4 The ageing housing stock in Wales across all tenures makes it more difficult to bring properties up to high SAP/EPC levels. For example 43% of tenants in the PRS are living in pre 1919 houses. In addition only 10% of Welsh homes were built in the last 18 years.

2.5 In more rural areas of Wales a significant number of properties are 'off gas' properties which have to rely on expensive alternative fuel sources.

2.6 In the private sector many solid walled construction properties have failed to receive the required 'whole house' approach when energy efficiency programmes have been introduced.. Instead, many WG funding programmes have seen pepper potting improvements to households rather than area based improvement programmes involving large numbers of stock. Hence, these programmes have had a limited impact on fuel poverty. In addition a number of the funding programmes have concentrated on the easiest install measures that quickly improve SAP ratings such as boiler replacements and loft insulation, without addressing the problem of improving the thermal efficiency of the fabric of the dwellings.

2.7 Households living in poor thermally efficient homes can suffer from fuel poverty even where there is a decent household income as a result of increasing fuel prices, heat loss through the fabric and ineligibility for WG grant programmes.

### **3. How Welsh Government action to date has helped to combat fuel poverty, in particular, the impact of the Warm Homes Programme (including Nest and Arbed) and the Welsh Housing Quality Standard**

3.1 Since 2011, more than £265m has been invested in 55000 homes through the Arbed and Nest schemes in Wales. Swansea Council have been heavily involved in Arbed from its inception 2010 to the present day. We have delivered various schemes to both the private and public sector housing stock, incorporation measures including solid and internal wall insulation through to new boilers and the introduction of renewables in the form of photovoltaics and solar hot water. There has also been assistance on the education of energy use.

3.2 Since 2003, over £1bn has been spent by Authorities on bringing their stock up to WHQS. By 2021 Swansea Council would have spent nearly £500m on its stock since 2003 in bringing its stock up to the WHQS with there being a positive impact for all tenures. However it is difficult to quantify how the WHQS has benefited tenants.

3.3 The Homes as Power Stations project, which forms part of the Swansea Bay City Deal with the Welsh and UK Governments, aims to deliver smart, low carbon, energy-efficient homes across the City Region. The project will

deliver a programme of new build developments, the retro-fitting of existing buildings and local supply chain development. The project will help to tackle fuel poverty, cut carbon emissions and meet the need for more housing in the region. The health and well-being aspects of warmer homes and the reduction in fuel poverty will be monitored as part of the project. A pilot scheme to inform the Homes as Power Stations concept is under development in Neath.

#### **4. How the Welsh Government's successor to the fuel poverty strategy (due for consultation in Autumn 2019) should differ from its 2010 strategy**

4.1 The strategy should recognise that post achievement of WHQS in 2020, the private sector should be targeted in terms of measures to improve fuel poverty as its likely the most extreme cases of fuel poverty exist in this sector with many pre 1919 properties having received little or no improvements to bring them up to modern thermal efficiency standards. Therefore the strategy should review the minimum EPC rating for PRS properties.

4.2 In addition the new strategy should:

4.3 Recommend that Energy Suppliers simplify tariffs.

4.4 Recommend that energy customers are not automatically placed on the highest priced tariff at the end of a tariff contract period.

4.5 Include an action about Smart Meters so that take up can be encouraged.

#### **5. What steps the Welsh Government should take to ensure that new-build homes, as well as existing homes, are highly energy efficient to prevent them causing fuel poverty in the future?**

5.1. Swansea Council would like the WG to take the following steps:

- 5.2. Monitor properties built under IHP to determine which specification is the optimum one in term of addressing fuel poverty
- 5.3. Carry out retrofit pilots to determine what solutions are best for certain property types
- 5.4. Introduce incentives for owner occupiers to undertake improvements
- 5.5. Implement the recommendations in Better Homes, Better Wales Better World that refer to new build. This is relatively easy to achieve with social new build as it can be made a condition of grant but how will this be tackled in private sector.

# Agenda Item 3

Cynulliad Cenedlaethol Cymru | National Assembly for Wales

Y Pwyllgor Newid Hinsawdd, Amgylchedd a Materion Gwledig

Climate Change, Environment and Rural Affairs Committee

Ymchwiliad i Dlodi Tanwydd | Inquiry into Fuel Poverty

FP 21

Ymateb gan : Sefydliad Tai Siartredig Cymru

Evidence from : Chartered Institute of Housing Cymru

The Chartered Institute of Housing (CIH) is the independent voice for housing and the home of professional standards. Our goal is simple – to provide housing professionals with the advice, support and knowledge they need to be brilliant. CIH is a registered charity and not-for-profit organisation. This means that the money we make is put back into the organisation and funds the activities we carry out to support the housing sector. We have a diverse membership of people who work in both the public and private sectors, in 20 countries on five continents across the world. Further information is available at: [www.cih.org](http://www.cih.org)

In Wales, we aim to provide a professional and impartial voice for housing across all sectors to emphasise the particular context of housing in Wales and to work with organisations to identify housing solutions.

## General Comments

CIH Cymru welcomes the opportunity to provide information to the Climate Change, Environment and Rural Affairs Committee as it undertakes an inquiry into fuel poverty in Wales.

Our response is informed by feedback from our members, our knowledge of the housing industry and expertise from our policy and practice teams.

CIH Cymru supports the development of Welsh policies, practices and legislation that aim to address the key housing challenges we face, to improve standards and supply, promote community cohesion, tackle poverty and promote equality. We promote a *one housing system* approach that:

- places the delivery of additional affordable housing at the top of national, regional and local strategies as a primary method of tackling the housing crisis;
- secures investment to ensure the high and sustainable quality of all homes in a sustainable framework;
- improves standards and develops the consumer voice within the private rented sector;
- promotes the concept of housing led regeneration to capture the added value that housing brings in terms of economic, social and environmental outcomes;
- recognises that meeting the housing needs of our communities is a key aspect of tackling inequality and poverty;
- ensures that there are properly resourced support services in place to prevent homelessness and protect the most vulnerable;
- uses current and potential legislative and financial powers to intervene in housing markets and benefit schemes;
- promotes consumer rights & tenant involvement;
- and supports the continued professional development of housing practitioners.

## **1. Introduction**

- 1.1 Fuel poverty continues to be a substantial challenge in Wales having a wide-ranging impact on individuals and communities. Housing professionals and the housing sector more broadly are in an influential position in addressing the impact and working to reduce and eradicate fuel poverty. Significant progress has been achieved through working toward the Welsh Housing Quality Standard in addressing the fuel efficiency of current homes and the Innovative Housing Programme as a means to test new ways to reduce the carbon footprint of delivering and maintaining newer forms of housing.

1.2 Added to this, the affordable housing review recommendations focus heavily in some areas on the standards current and new homes should seek to achieve linking to modern methods of construction and innovative technologies, it is timely to reflect and consider how best to make further progress in this area.

## 2. The scale and impacts of fuel poverty in Wales

2.1 The Welsh Government most recent statistic in this area reflect that:

- 155,000 households were living in fuel poverty. This is equivalent to 12% of all households in Wales.
- Households living in the private rented sector were more likely to be fuel poor with 20% of these households living in fuel poverty.
- 50% of those living in fuel poverty were single person households without children.
- Households living in older properties are more likely to be fuel poor. 20% of households living in pre-1919 dwellings were fuel poor.
- 21% of households living in properties with uninsulated solid walls were fuel poor and 39% of people living in properties that do not have central heating were fuel poor.
- 43% of households living in properties with poorer energy efficiency (EPC Bands F and G) were fuel poor compared to 5% of households living in properties in bands B to C.

2.2 Whilst these figures are clearly significant and reflect the importance of maintaining and accelerating momentum in this area, the percentage of people living in severe fuel poverty has fallen to 2 per cent of all households, having been at around 5 per cent of all households in 2008.

2.3 Despite this, fuel poverty is one of the driving forces perpetuating the difficult decisions individuals and families in these circumstances have to make between heating, eating or paying rent.

**3. Why the Welsh Government failed to meet its statutory target of eradicating fuel poverty in Wales by 2018.**

3.1 We welcomed the ambition by the Welsh Government to eradicate fuel poverty by 2018. We believe that a combination of factors has led to this not being achieved. Poverty levels, generally speaking, have remained static in Wales at around 24 per cent of the Welsh population, despite good progress in reducing unemployment. It is clear that given the stubbornness of these figures the economic impetus required to begin turning the tide on issues like fuel poverty (and other related areas such as food poverty) has not been consistently present.

3.2 Our members report that since the introduction of Universal Credit, increasing numbers of tenants are at risk of struggling with their finances. Anecdotally, this can be caused by a number of factors including initial delays in payments, sanctions reducing payments and delays in accepting supporting evidence sometimes required when making a complex claim.

3.3 Whilst these material aspects clearly have some influence over people's ability to afford to heat their home efficiently, there is also the physical infrastructure to consider. The Welsh Housing Conditions Survey reports that Wales has some of the oldest housing stock in Europe. Whilst it is therefore a challenge across all housing tenures for homes to be made more energy efficient, we are concerned that private landlords who are largely smaller businesses, may not be able to leverage the investment required to upgrade their homes at the pace, scale and to the standard required without considerable technical support and expertise to draw from, in addition to financial support.

**4. How Welsh Government action to date has helped to combat fuel poverty, in particular, the impact of the Warm Homes Programme (including Nest and Arbed) and the Welsh Housing Quality Standard.**

4.1 We support the call within the [The Better Homes, Better Wales Better World](#) to ensure all schemes mentioned are re-appraised in the context of zero-carbon and gain a greater understanding of households/circumstances that are prioritised.

- 4.2 The Welsh Housing Quality Standard has been a significant programme of work for the social housing sector in Wales – substantially increasing the quality and efficiency of older homes in Wales whilst increasing employment opportunities and supporting local contractors.
- 4.3 Compliance with the Welsh Housing Quality Standard has continued to increase with 91 per cent of all social homes now complying with the standard in all social housing intended to be achieved by December 2020. Levels of compliance is higher for housing associations at 99 per cent, including acceptable fails compared to 77 per cent for local authority homes.
- 4.4 According to the latest analysis on the energy efficiency of homes in Wales, gathered through the Welsh Housing Conditions Survey, social housing is by some margin, the most efficient form of tenure with 50 per cent of home achieving EPC rating band C or above. This is compared to around 25 per cent for homes in the private rented sector and those that are owner occupied. This difference is clear evidence of the impact achieved through activity in bringing homes in line with the WHQS.
5. **How the Welsh Government’s successor to the fuel poverty strategy (due for consultation in Autumn 2019) should differ from its 2010 strategy.**
- 5.1 **Measurement of fuel poverty:** We support calls by a number of organisations working this area, including the Energy Saving Trust to re-consider the definition of fuel poverty in Wales, mirroring the approach now taken in Scotland. The current definition considers anyone who spends over ten per cent of their income on heating their home as ‘fuel poor’. The Scottish model is more refined in its approach considering people to be in fuel poverty who are on both low incomes and spend a high proportion of their income on heating their home.
- 5.2 **Links to decarbonisation:** We believe the increasing the quality and efficiency of our existing (in addition to new) homes should be a main area of focus for the future. [The Better Homes, Better Wales Better World](#) report calls for a 30-year decarbonisation plan and a long-term approached supported on a cross-party basis. We wholeheartedly support this approach and believe

there are additional opportunities to learn from practice delivered through the Welsh Government's Innovative Housing Programme to increase quality, consistency and economies of scale.

- 5.3 The Welsh Government has committed to undertaking modelling for social housing and those homes in fuel poverty to bring these homes up to standard by 2025; it seems sensible that this costing should be linked with how activity is prioritised within any new strategy.
- 5.4 **Clear links with the affordable housing review:** The affordable housing review has set the tone for the next evolution of providing affordable housing in Wales. We believe that any strategy linked to this area should show an awareness of and sensibly link to relevant aspects of the review's implementation. In the context of fuel poverty, we feel these areas should include:
- Housing standards and DQR being utilised across section 106 agreements for affordable housing
  - Accelerating the use and impact of modern methods of construction to meet immediate housing demand with homes that are energy efficient and high quality
  - Prioritising social homes and those in fuel poverty for investment in the immediate 10-year period in relation to retrofitting and improvement activity
  - The future of the dowry and major repairs allowance for stock transfer housing associations and stock-retaining local authorities
6. **What steps the Welsh Government should take to ensure that new-build homes, as well as existing homes, are highly energy efficient to prevent them causing fuel poverty in the future.**
- 6.1 Many of our members have voiced concerns over the decarbonisation targets for existing homes, calling for greater clarity on what financial and technical support will be available to social housing providers in ensuring older homes can achieve such a high efficiency rating. There is a need to carefully consider how the financial outlay associated with this work will be supported with [The Better Homes, Better Wales Better World](#) report suggesting that annually the cost of decarbonising homes in Wales could be around £0.5 billion – £1 billion.

6.2 We believe that there should be a recognition within affordable housing targets set by the Welsh Government of the resource and time implications involved in working towards decarbonisation targets whilst also delivering more high quality affordable housing at pace without the current benefits of economies, reliable supply chains able to cope with demand that offer value for money over and above financial considerations. There needs to be tolerance in relation to the time required to realise these benefit as well as the implications for the social housing sector investing considerable financial and staff resources in delivering new affordable home and upgrading existing homes at pace in tandem.

## Cynulliad Cenedlaethol Cymru | National Assembly for Wales

Y Pwyllgor Newid Hinsawdd, Amgylchedd a Materion Gwledig

Climate Change, Environment and Rural Affairs Committee

Ymchwiliad i Dlodi Tanwydd | Inquiry into Fuel Poverty

FP 28

Ymateb gan : Community Housing Cymru (CHC)

Evidence from : Cartrefi Cymunedol Cymru (CCC)

### About Us

**Community Housing Cymru (CHC)** is the representative body for housing associations and community mutuals in Wales, which are all not-for profit organisations. Our members provide over 158,000 homes and related housing services across Wales for around 10% of the population.

CHC launched its twenty-year 'Housing Horizons' vision for Welsh housing associations in November 2017. Our vision is a Wales where good housing is a basic right for all, and the vision's commitments include a pledge to build 75,000 new homes by 2036.

Our members work closely with local government, third sector organisations and the Welsh Government to provide a range of services in communities across Wales.

#### **CHC's objectives are to:**

- Be the leading voice of the social housing sector.
- Promote the social housing sector in Wales.
- Promote the relief of financial hardship through the sector's provision of low cost social housing.
- Provide services, education, training, information, advice and support to members.
- Encourage and facilitate the provision, construction, improvement and management of low cost social housing by housing associations in Wales.

CHC welcomes the opportunity to provide written evidence on fuel poverty on behalf of the sector for the Climate Change Environment and Rural Affairs Committee.

## The scale and impacts of fuel poverty in Wales

CHC is pleased to see that the number of social housing tenants living in fuel poverty has continued on a downward trend. According to the fuel poverty estimates for Wales 2018<sup>1</sup>, 9% of social housing tenants were living in fuel poverty, compared to 20% of privately rented households and 11% of owner occupiers. The percentage of households in the social housing sector living in fuel poverty decreased from 26% in 2008 to 9% in 2018. A rise in incomes since 2008 and a reduction in household energy consumption have contributed to this downward trend.

Despite housing association's (HA's) continued work in improving the energy efficiency of its housing stock through WHQS, Arbed and other energy efficiency programmes, some social housing tenants remain or have become fuel poor. The scale of social housing tenants living in fuel poverty equates to approximately 20,000 households across Wales, and, this continues to be an issue felt most prominently by the most vulnerable members of society, including older tenants and the unemployed, as they are often on fixed income and spend disproportionately more time in their homes.

Fuel poverty causes long term health issues which tend to be felt more so by older people who are more likely to be at risk of heart and lung disease, as well as worsening conditions like arthritis and rheumatism. A report produced by Public Health Wales, BRE and Community Housing Cymru in 2019 found that 10% of excess winter deaths can be attributed directly to fuel poverty<sup>2</sup>. Living in a cold home can also lead to social isolation, stress and worry about heating bills and debt. This can affect children as well as adults and have a negative impact on various aspects of life, including mental health, growth, and attainment at school.

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<sup>1</sup> Fuel Poverty estimates for Wales, 2018 <https://gov.wales/fuel-poverty-estimates-wales>

## **Why the Welsh Government failed to meet its statutory target of eradicating fuel poverty in Wales by 2018**

In 2003 the Welsh Government set an ambitious target to eradicate fuel poverty in social housing by 2012, and in Wales by 2018. Whilst there has been significant reduction in the incidence of fuel poverty within the social housing sector, CHC members have expressed that despite the good intentions of the 2010 Welsh Government Fuel Poverty programme, the scale of change could have been greater. Lessons were learnt from Arbed 1 and Arbed 2 but the potential of the programmes were limited. The competitive and laborious bidding process for Arbed 1 and Arbed 2 funding meant that many HA's (particularly smaller housing associations), who had intended to use the programme to support large scale retrofit of existing homes, were unsuccessful and unable to proceed with their ambitions.

The Arbed programme and WHQS requirements naturally led to activity being focussed on measures that provided the best value for money and improved the energy performance rating of properties, which mainly included boiler replacements, cavity wall insulation and external wall insulation. Whilst these measures did lead to significant improvement in the energy performance of properties and comfort for many social housing tenants (the majority of properties improved from EPC rating F to a C), our members have reported that the measurement and evaluation of these programmes did not show positive outcomes for lowering energy costs and overcoming fuel poverty. Whilst tenants felt an improvement in comfort in their home this did not necessarily lead to a reduction in their energy consumption, and the cycle of paying a disproportionately higher amount on energy bills compared to income therefore continued for some. This demonstrates the importance of wrap around support and advice to tenants on energy switching, managing finances, and (if applicable) access to welfare, in addition to the improvement in the fabric of the property.

In addition, the scale of impact was particularly limited for 'hard to treat' properties that still require significant levels of intervention, and funding, to improve their stock condition. Pre-1920 and rural housing are the least energy efficient homes due to their age and the complexity and expense of the measures required to improve their energy performance. This includes the

installation of internal wall insulation and air or ground source heat pumps for off-grid properties. These properties are still unable to be supported through existing Welsh Government programmes and further research is required to identify a suite of measures that effectively improve the energy performance of these properties, whilst providing value for money for tenants and housing associations.

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<sup>2</sup> Making a Difference Housing and Health: A Case for Investment 2019. BRE, Community Housing Cymru and Public Health Wales. <https://phw.nhs.wales/news-and-publications/publications/making-a-difference-housing-and-health-publications/phw-making-a-difference-housing-and-health-a-case-for-investment-pdf/>

**How Welsh Government action to date has helped to combat fuel poverty, in particular, the impact of the Warm Homes Programme (including Nest and Arbed) and the Welsh Housing Quality Standard**

CHC and HAs in Wales were key strategic partners, with the Welsh Government, in the delivery of both Arbed phase 1 and 2. The Welsh Government invested £30m towards the delivery of Arbed phase 1 with an additional £32m from HAs own budgets and match funding from energy efficiency programmes. HAs in Wales successfully delivered phase 1 on behalf of the Welsh Government using its own local suppliers and Welsh based installers sourced from their Welsh HA supply chain and installer network.

Arbed investment enabled a large number of HA's to install energy efficiency measures, taking a significant number of tenants out of fuel poverty which is evidenced by the significant decline in fuel poverty amongst social housing tenants in recent years. Welsh Government benefited from Melin Homes acting as one of the Arbed scheme managers. Melin Homes previously calculated that for every £1 invested through Arbed phase 2, £2 went back into the community<sup>3</sup>.

Arbed phase 1 model was successful in targeting the householders and areas most in need and in fuel poverty. Using local suppliers and installers kept money in Wales. Through Arbed phase 1, funding HAs and homeowners benefited significantly from investment in the installation of a mix of energy efficient measures including solid wall insulation, solar PV, new boilers, communal solar thermal systems and other technologies. As a direct result, a significant number of tenant and homeowner beneficiaries were lifted out of fuel poverty.<sup>4</sup>

Arbed phase 2 was delivered differently to Arbed phase 1, instead focusing on the private rented/owner occupied sector and led by local authorities. Local authorities were required to work with HAs and other partners to develop their bids. The delivery mechanism for Arbed phase 2, targeting homeowner properties over HA owned properties and being led by local authorities meant that less HA energy inefficient properties were supported in this phase. While we recognise that Arbed is a programme which should apply across tenures, we believe that the change in the application process from Arbed phase 1 and

2 led to a patchy approach which is too dependent on local government priorities and processes. In some areas good partnership bids were developed, but in others, some HAs were not involved in bids for funding. Various HAs have indicated issues with the delivery of Arbed phase 2 in particular in North Wales, including communication issues and not using the local supply chain, one of the main aims of Arbed.

The Welsh Housing Quality Standard requires all social landlords to improve their housing stock to an acceptable level by 2020. As part of the standard, social housing providers are required to increase their energy SAP rating to 65 and above. As of March 2018, 99 per cent of HA's in Wales were compliant with the WHQS (including acceptable fails), including raising the SAP rating of its tenanted properties to 65 and above. Along with the WHQS, our members have specific long term targets to improve the energy efficiency of its housing stock and reduce the fuel poverty of its tenants.

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<sup>3</sup> Ricardo Report for Welsh Government on the Arbed EU project, page 23  
<https://gweddill.gov.wales/docs/desh/publications/171106-welsh-government-warm-homes-arbed-eu-project-final-report-en.pdf>

<sup>4</sup> Ricardo Report for Welsh Government on the Arbed EU project, page 4  
<https://gweddill.gov.wales/docs/desh/publications/171106-welsh-government-warm-homes-arbed-eu-project-final-report-en.pdf>

**How the Welsh Government's successor to the fuel poverty strategy (due for consultation in Autumn 2019) should differ from its 2010 strategy**

CHC welcomes the Welsh Government's decarbonisation ambitions and the recommendations introduced by the Decarbonisation of Homes in Wales Advisory Group' in the Better Homes, Better Wales, Better World report<sup>5</sup>. Of particular relevance to the successor fuel poverty strategy is the following recommendation from the advisory group: "The Welsh Government should urgently commence a 10-year programme to prioritise the retrofit of certain homes. The Welsh Government should set a target of EPC Band A for homes in social ownership and homes in fuel poverty". CHC welcomes this recommendation; however this ambition can only be achieved if extensive research and modelling is undertaken to identify the true scale of the costs and the types of measures required for all social housing dwellings to meet EPC A. We expect the cost to be significant, particularly for 'hard to treat' properties, as explained earlier in this response.

Collaboration across local authorities and housing associations, and significant investment and support from Welsh Government would be required to meet this ambition. As a sector we are up for the challenge and our commitment and the potential of housing associations has been demonstrated by our work during Arbed 1 and Arbed 2 and through meeting WHQS.

**We would like to take this opportunity to highlight that the Welsh Government's successor fuel poverty strategy must fully compliment the Welsh Government's decarbonisation programme and its ambitions. With the recent surge of support for climate change action there is a coalition of the willing, particularly in the social housing sector, to support these ambitions. Any funding from Welsh Government to support decarbonisation must allow all housing associations to access the fund in a fair and equitable way.**

Many HAs have responded to CHC to state that rural fuel poverty needs to be recognised and addressed specifically by the Welsh Government. The cost of living in rural areas is higher than in more densely populated areas. Tenants and homeowners living in rural areas are more likely to be in fuel poverty as they are required to pay more for energy, transport and food.

Rural traditional HAs have a smaller number of stock and members have stated that this affects their ability to attract energy efficiency funding and tackle energy inefficient housing stock. A number of our member's housing in rural areas is hard to treat with low SAP ratings.

Many householders and tenants living in rural off gas areas do not have a choice on the type of fuel they can have in their properties and have to rely on costly oil and LRG gas to heat their homes. Rural HAs also have the highest proportion of homes off grid with higher energy costs. HAs working in rural areas are continually looking at new technology to address rural heating of new and existing houses to assist tenants in rural fuel poverty.

**CHC are keen to work with the Welsh Government to develop specific rural fuel poverty policies to support rural tenants living in fuel poverty.**

The new fuel poverty strategy should also support the delivery of a holistic programme that directly, and equally, targets the three determinants of fuel poverty: housing condition, the financial circumstances of the occupant, and energy behaviour. The 2010 strategy largely focussed on improving the condition of housing, and whilst we recognise that this work needs to continue, we believe that a gap in services exists to support households with income maximisation, switching energy providers and behaviour change. Local, community based services rather than call centre advice services are essential to proactively identify tenants in need of support (often through word of mouth) and provide wrap around support.

CHC members provide this type of local community based support and are proactive in supporting fuel poor tenants to obtain their entitled benefits that relieves them of fuel poverty, helping tenants secure the Warm Home Discount and Winter Fuel Payments. Our members also provide tenant fuel debt advice by supporting them, for example in negotiating re-payments of gas and electric debts with energy providers (Appendix 1).

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<sup>5</sup> Independent review on decarbonising Welsh Homes, Better Homes, Better Wales, Better World <https://gov.wales/sites/default/files/publications/2019-07/independent-review-on-decarbonising-welsh-homes-report.pdf>

Some housing associations have gone a step further and developed specific energy efficiency advice programmes aimed at reducing fuel poverty and reducing energy consumption. A number of these projects have been successful in training and employing unemployed tenants to become energy advisors and mentors and install small scale energy efficiency improvements. These projects have had positive results in terms of encouraging tenants to become more energy efficient, saving them money, and changing their behaviour. Information about specific projects and support provided by HAs is provided in Appendix 1.

Lessons should also be learnt from the evaluation findings of the Arbed and Nest programmes. In 2019 Public Health Wales, Community Housing Cymru and BRE published the report 'Making a Difference: Housing and Health'<sup>6</sup> which identified the most successful housing related measures for improving health. The report highlights the differing outcomes of the Nest and Arbed programmes. Nest targeted individuals at-risk of fuel poverty whereas Arbed targeted areas containing low-income households. An evaluation of Arbed found that while the interventions raised indoor temperatures, reduced energy use, and improved subjective well-being and a number of psychosocial outcomes, the study found no evidence of changes in physical health or reduction in health service usage. However, an evaluation of the Nest scheme found that energy efficiency measures provided a health protective effect, decreasing the number of GP visits for respiratory conditions in the intervention group by 3.9%, compared to a 9.8% increase for the control group.

Comparing these findings it appears that a targeted approach assisting vulnerable households is more effective than an area-based approach, which should be considered in the development of Welsh Government's successor fuel poverty programme. Welsh Government should explore how the data available from Smart Meters (high/low usage consumers) could also be used to target vulnerable households.

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<sup>6</sup> Making a Difference Housing and Health: A Case for Investment 2019. BRE, Community Housing Cymru and Public Health Wales <https://phw.nhs.wales/news-and-publications/publications/making-a-difference-housing-and-health-publications/phw-making-a-difference-housing-and-health-a-case-for-investment-pdf/>

CHC's 'Making a Difference: Housing and Health'<sup>7</sup> report also highlights the type of measures that provide the biggest impact in terms of improved health and wellbeing. Insulating existing older houses in low-income communities has been found to increase indoor temperatures whilst reducing energy consumption and reducing hospital admissions from respiratory conditions. Investing in mitigating against excess cold in homes results in the initial investment being paid back in 7 years as a result of reduced fuel costs, health care costs and improved health-related quality of life.

Effectively identifying people with poor health who are or are at risk of living in fuel poverty requires closer alignment of housing, health and social care, to maximise benefits of collaboration and integration. This requires a greater recognition by the health and care sectors of the significant contribution housing brings in improving health and wellbeing both at an individual and population level.

**CHC would like to take this opportunity to reiterate the housing quality recommendations presented in our joint report with Public Health Wales and BRE.** The case for continued support and investment from Welsh Government to alleviate fuel poverty is profound, and we urge Welsh Government to consider the following proposals during the development of the successor fuel poverty programme:

#### **1) Expand the housing domain of the WIMD**

The housing domain of the Wales Index of Multiple Deprivation (WIMD) is limited to two indicators (people living in overcrowded households; people living in households with no central heating).

Additional indicators that could increase the robustness of this domain include inadequate housing conditions, fuel poverty and lack of affordable housing. Whilst some housing associations have programmes to assist those experiencing fuel poverty who have approached the HA, access to improved data on the incidence and location of fuel poverty would assist with targeting support to those who may go undetected in the system. This is especially important now that we are reaching particularly low levels of those in fuel poverty, most of whom are likely to have so far been undetected and targeted

## 2) Consider the WHCS findings

Findings from the latest Welsh Housing Conditions Survey (2018) can be used to better understand and develop further evidence of the impact of poor housing quality on health and societal costs.

## 3) Appropriate targeting

The biggest returns on investment rely on targeting the vulnerable groups and households most in need, rather than on an area-based approach. Identifying groups with greatest need requires cross organisational working and sharing of intelligence.

**CHC believe that the Welsh Government needs to continue developing energy efficiency and fuel poverty programmes that improve the energy efficiency of tenanted and homeowner properties in Wales and alleviate fuel poverty. CHC and our members have expert knowledge, experience and awareness of fuel poverty issues, and we welcome the opportunity to discuss the future delivery and design of new fuel poverty programmes.**

**CHC believe that Welsh HAs are well placed to lead and delivery future Welsh Government fuel poverty and energy efficiency programmes. CHC members have demonstrated in the delivery of Arbed 1 their flexibility in developing and running successful energy efficiency schemes. They also have valuable knowledge, skills and experience of installing and dealing with hard to treat properties in Wales.**

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<sup>7</sup> Making a Difference Housing and Health: A Case for Investment 2019. BRE, Community Housing Cymru and Public Health Wales <https://phw.nhs.wales/news-and-publications/publications/making-a-difference-housing-and-health-publications/phw-making-a-difference-housing-and-health-a-case-for-investment-pdf/>

**What steps the Welsh Government should take to ensure that new-build homes, as well as existing homes, are highly energy efficient to prevent them causing fuel poverty in the future**

CHC and its members are committed to develop highly energy efficient homes and we believe that good quality housing will prevent fuel poverty in the future. HA's have been instrumental in the delivery of highly energy efficient homes across Wales, including social housing built to Passivhaus standard.

The Welsh Government's flagship Innovative Housing Programme (IHP) has supported housing associations and local authorities to develop high quality housing that tackles poverty by providing homes which are more energy efficient and cheaper to run. The £90m investment from Welsh Government into the IHP programme provided the opportunity for the housing sector to test and develop a range of building techniques including battery technology, solar panels, air source heat pumps, timber construction and modular housing.

Developing low-carbon and highly energy efficient affordable homes is one of the biggest challenges for the housing sector. Developing smart homes that act as power stations, producing more energy than is consumed, will help us meet that challenge. HA's including Pobl Group are leading the way in this area and have developed 16 "active homes" in Neath (further information provided in Appendix 2). These homes are being monitored post-completion to see how the systems perform.

Housing associations in Wales have ambitions to build 75,000 new homes by 2036, and earlier this year, an Independent Review of Affordable Housing recognised that additional investment was needed to meet that ambition. Further collaboration is needed across Local Authorities and HA's to meet these ambitions, as well as a grant system and rent policy that encourages long term planning and sustainability. **We need to see investment in new low carbon energy efficient homes remain as a priority for the Welsh Government to continue the momentum already achieved by the sector.**

**We urge the Welsh Government to consider and review the success of innovative energy efficient developments in terms of carbon production, energy usage and value for money, so that the sector has a good**

understanding of the construction techniques and their suitability for the local community.

## Appendix

### Appendix 1 – Examples of HA energy efficiency projects

#### **Newport City Homes (NCH) and Switch2 Energy:**

- More than 750 homes connected to NCH's Duffryn district heating scheme have halved their energy consumption by using Switch2 Energy's G6 smart energy pay-as-you-go meters.
- Previously, residents paid a fixed weekly charge for their heating and hot water, but now they have control over their usage and costs, which allows them to budget better and save money.

More information [here](#).

#### **Cartrefi Conwy:**

- Work began in early 2019 to produce low energy homes with Norfolk-based Beattie Passive. The homes which are part of their strategy to create 250 new homes by 2020 are estimated to save residents up to 90% in annual energy costs.

More information [here](#).

#### **Trivallis money advice service:**

- Over the last three years, Trivallis' money advice service has saved its customers over £210,000 through providing energy advice, assisting customers to switch energy supplier and access various entitlements and discounts to reduce their energy costs.
- All members of Trivallis' Money Advice Team hold the National Energy Action (NEA) Level 3 Award in energy advice.
- Trivallis also has members of staff with further training in fuel debt advice, home energy advice and behaviour change.

- Examples of where significant behaviour change could reduce a household's fuel costs by up to £150 over the course of a year
- Communications campaign to promote energy advice online and through social media relating to smart meter rollout, energy switching advice and warm home discounts.

More information about Trivallis, [here](#)

### **Merthyr Tydfil Housing Association – helping tenants tackle fuel poverty:**

- Assisting in the application for a warm home discount if it's offered by their supplier (£140 credit to the account).
- Price comparisons and helping to switch suppliers to ensure the best tariffs.
- If there's debt, working with utility providers to get repayments to a manageable repayment.
- Liaising with utility companies to change meters to credit meters rather than prepayment so that better tariffs are available
- Helping tenants set up direct debits so they are getting the best deal and more tariffs are available to those paying by direct debit..
- Helping where there are billing/meter issues and claiming compensation
- Getting eligible tenants onto the priority register.
- Save money in other areas such as Welsh Water Helpu Scheme to save tenants money so they have more available money.

More information about Merthyr Tydfil Housing Association [here](#).

### **Grŵp Cynefin – Energy Wardens project (reviewed 1<sup>st</sup> April 2018 – 31<sup>st</sup> March 2019):**

- Targeted locations in North Wales where examples of fuel poverty were already prevalent.
- A total of 102 warm home discount applications were submitted, providing an overall saving of £14,280.
- The energy wardens supported 2 tenants recently regarding Welsh Water

Helpu applications providing a saving of £280.

More information about Grŵp Cynefin [here](#).

## **Appendix 2– HA Smart Homes example**

### **Pobl Group – Active Homes model:**

- Partnership with Neath Port Talbot Council and SPECIFIC which integrates innovative technology developed into the homes.
- Builds beyond the concept of carbon neutral homes towards overproduction of energy giving multiple options on how those funds can be reinvested.
- Tenants to receive training on how to use the technology.
- Energy bills are expected to be significantly lower than other houses.

More information [here](#).

Cynulliad Cenedlaethol Cymru | National Assembly for Wales  
Y Pwyllgor Newid Hinsawdd, Amgylchedd a Materion Gwledig  
Climate Change, Environment and Rural Affairs Committee  
Ymchwiliad i Dlodi Tanwydd | Inquiry into Fuel Poverty  
FP 03

Ymateb gan : Cymdeithas Landlordiaid Preswyl  
Evidence from : Residential Landlords Association

## **About the RLA**

The Residential Landlords Association (RLA) represents the interests of landlords in the private rented sector (PRS) across England and Wales. With over 30,000 subscribing members and an additional 20,000 registered guests who engage regularly with the Association, the RLA is the leading voice of private landlords. Combined, the RLA members manage over a quarter of a million properties.

The RLA provides support and advice to members and seeks to raise standards in the PRS through its code of conduct, training and accreditation. Many of the RLA's resources are available free to non-member landlords and tenants.

The Association campaigns to improve the PRS for both landlords and tenants, engaging with policymakers at all levels of Government to support its mission of making renting better.

### **1. The scale and impacts of fuel poverty in Wales.**

#### **The scale**

Fuel poverty is a major public health issue, responsible for an excess death rate of almost 2000 people in the winter of 2010/11. This number has declined since then due to milder winters, but older housing stock and high energy prices mean the population remains vulnerable to a harsh winter especially elderly, disabled or groups of people particularly susceptible to the cold. It has a major contribution towards creating health issues such as respiratory conditions, cancer and circulation problems as well as mental health disorders and for people to not meet their full potential.

In Wales, a person defined as living in fuel poverty is someone who in order to heat their home to a satisfactory standard, will need to spend more than 10 per cent of their household income on fuel. With over 300,000 Welsh households or 24% of total households living in fuel poverty, fuel poverty is a major concern and Wales has some of the highest levels of fuel poverty in the UK.

Of course, fuel poverty is prevalent in all housing tenures. However, it is most prominent in the Private Rented Sector. This is due to several factors including the PRS containing some of the oldest proportion of old stock including a large proportion of pre-1919 stock in comparison to the social sector and owner-occupied sector and the PRS being used to house increasingly high numbers of vulnerable tenants.

According to the Welsh Housing Conditions Survey 2017/18, housing conditions have improved across all tenures. Although the data also indicated that the PRS had the highest proportion of poor-quality housing, the conditions had improved considerably since 1981. The data revealed that around 4 per cent of social housing stock was built pre 1919 compared to 43 per cent in the PRS. This is understandably why the social sector has the highest SAP rating at 68 and an average EPC rating at D compared to the PRS SAP rating of 60. Over a ten-year period, the SAP rating in the PRS had increased by 13 points and was deemed to have made the most improvements out of all tenures.

### **The impact**

One of the grim impacts of fuel poverty, is that it forces the most vulnerable in society to make the choice between heating and eating. As a direct consequence, those impacted can have poor diet, find themselves in debt and have difficulty paying utility bills. Over 50,000 households find themselves in debt to electricity suppliers while data for gas suppliers indicates a similar picture.

The latest data from the Housing Conditions Survey indicates that the PRS is increasingly housing the most vulnerable including more families and elderly people. Evidently more support is needed to target fuel poverty within the

PRS rather than going to the relatively easy to engage households in the owner occupied and social housing sector.

As more family's access the PRS, the impact on children and young people is a concern. According to a survey from Save the Children, 45 per cent of parents said they were considering cutting back on food in order to pay energy bills while over half of respondents believe their children's health will be impacted by fuel poverty. Fuel poverty has a direct impact on respiratory illness such as asthma, bronchitis and wheezy chests.

Elderly people are significantly more likely to suffer or die from Excess Winter Deaths especially during winter months and evidence suggests that cold conditions can further trigger dementia and mental health conditions.

## **2. Why the Welsh Government failed to meet its statutory target of eradicating fuel poverty in Wales by 2018.**

Some progress has been made in tackling fuel poverty. However, eradicating fuel poverty will not be achieved by targeting schemes in the most deprived LSOAs (through the Index of Multiple Deprivation) and in targeting households on means tested benefits and low incomes alone. A more holistic approach is required that not only targets all geographies across Wales including rural communities, but also ensures that all housing tenures have access to support. Some programmes have made significant inroads in tackling fuel poverty in the social and owner-occupied housing sectors but has done little to reduce fuel poverty in the PRS with little access to funding and support to landlords in this sector compared to the social sector.

Where funding is open to the PRS, we are concerned that programmes have inadequate support and communication with landlords to ensure properties in the PRS get access to funding. The RLA is concerned that many funding streams to tackle fuel poverty are not eligible to the PRS and even when access is open to the sector, the coordination and communication can often be weak and lack a coherent strategy for implementation.

One opportunity open to the PRS is ECO funding, which has been allocated from the UK Government and is open to the PRS and owner-occupied sector.

The RLA is concerned that as of late a new funding scheme, known as Eco Flex, is not being sufficiently taken up by Welsh local authorities and distributed to the PRS where the money is urgently needed. From our research and in communicating with Welsh local authorities, we are concerned that a significant number of local authorities are unable to make the most of Eco Flex due to limitations on resources and an inability to allocate the necessary officers to administer and monitor the scheme. On face value, there appears little support for local authorities in terms of monitoring and administering the scheme while English local authorities such as North Somerset are working effectively with local private landlords to ensure the money is used effectively.

We understand that other local authorities or indeed other organisations can administer and monitor Eco Flex applications on behalf of local authorities, and we are in talks with several local authorities in how we as an organisation could support the administration to the funding. We urgently call for greater partnership working between local authorities to ensure the PRS and those most at need get access to Eco Flex and call for the Welsh Government to use its influence in delivering a strategic approach to accessing funds in the most efficient way.

Additional factors other than access to funding include the growing price of energy, which has constitutently risen over the years. However, we accept that the Welsh Government have limited powers to mitigate these factors and we call for the National Assembly for Wales to consider additional powers and solutions to the problems of rising energy costs.

**3. How Welsh Government action to date has helped to combat fuel poverty, in particular, the impact of the Warm Homes Programme (including Nest and Arbed) and the Welsh Housing Quality Standard;**

The Welsh Housing Quality Standard, may have made progress in several factors on housing conditions, including ensuring housing is safe, well managed, adequately heated and meets the needs of tenants. However, this standard only relates to the social housing sector and would have no impact of other tenures where the priority should be met.

Much of the policy around improving energy efficiency within the PRS is being delivered by the UK Government through the Minimum Energy Efficiency Standards (MEES.) Since April, all new or renewed private sector tenancies require properties to have at least an 'E' rating on their Energy Performance Certificate. From 2020 that will apply to all private rented homes with the possibility that standards will be raised to a 'C' by 2030.

The UK Government initially implied that there would be a no cost to landlord's policy, but now costs are capped at £3,500. Our research laboratory, PEARL found 37 per cent of landlords with properties rated F or G are unable to afford to bring their property up to at least an E rating. On average, such landlords reported that it would cost them almost £5,800 to bring their properties up to the required standard. Furthermore, the House of Common's Business, Energy and Industry Strategy Committee have recommended that the cost cap to landlords be increased to £5,000, which we are concerned will further limit the ability of many landlords to make the improvements.

Previous research by RLA PEARL has found that 61 per cent of landlords reported that tax relief for energy efficiency works would encourage them to improve the energy efficiency of their properties. The rapidly changing sector, economic uncertainty, and increasing regulation is taking its toll. The proportion of landlords that are planning to sell properties in the next 12 months has increased by four percentage points since Q3 2016 and now stands at 23%. We estimate that this could be 133,000 net loss of properties to rent over the next 12 months.

While many of these proposals are not in the gift of the Welsh Government, we are calling for greater funding to be open to the PRS to mitigate against these challenges in order to support landlords improve the quality of their homes.

In terms of general action taken to tackle the problem of fuel poverty in Wales, it is a concern that general targets for eliminating fuel poverty were not met and energy prices have consistently risen over the past few years. Indeed, Welsh Government data taken from the fuel poverty projection tool

highlighted that over the period 1999 to 2012, action taken had only reduced fuel poverty by 3% across Welsh homes.

Given the many reasons for fuel poverty including poverty in general, energy costs and societal reasons, the ability of the Welsh Government might be curtailed by the lack of powers to tackle the fuel poverty holistically including tackling the issue of high energy costs.

Since 2012, the Welsh Government have invested over £150 million and improved over 27,000 homes, reducing energy bills and helping households to heat their homes at a more affordable cost. In 2015 – 16 the Nest scheme received £25.5 million and improved 6162 homes. Arbed received £19 million and improved 1971 properties. Schemes are geography based and centre on communities that are in the most deprived areas of Wales according to the Welsh Index of Multiple Deprivation. Nest eligibility is on means tested benefits and for homes that are E, F or G.

Despite the targeted nature of programmes such as NEST and Arbed, many of those homes in most need of support was not getting funding and support that they require including in the PRS. In terms of the NEST programme, the original target was to support 15,000 homes under the HEES. It was disappointing to learn that targets had been reduced to 5,000 during the second year of NEST. To put this in to context, just under 400,000 homes were believed to be in fuel poverty over 2012 around the same time of the second year of NEST.

Support on offer from the NEST programme including providing advice and education was also delivered by the Energy Saving Trust creating duplication in effort. Further to our concerns over the lack of support specifically to the PRS, with little monitoring and evaluation evidence, we have seen no evidence to support the impact support has had on the small cohort of households supported. We have concerns over whether many of these households were fuel poor in the first place and to what extent the issue of fuel poverty was eradicated as a result of the funding.

**4. How the Welsh Government's successor to the fuel poverty strategy (due for consultation in Autumn 2019) should differ from its 2010 strategy;**

Most importantly, we believe that there must be greater dialog and support between local authorities and landlords within the PRS. Local authorities can support landlords through their existing schemes such as empty homes strategies and regeneration schemes. Those landlords who contribute towards these local priorities and schemes should have greater support and be incentivised in making empty or dilapidated accommodation into a home fit for human habitation. We believe that the fuel poverty strategy should place a great emphasis on the issue of empty properties to ensure that funding is in place to support landlords in getting the property up to a sufficient standard, in order to prevent people living in hard to heat homes in the first instance. For the strategy to have long-term success, any objectives should focus on targeting hard to heat homes within the PRS rather than focusing on individual groups. This would ensure that the benefit of improvements to properties could reach more people as they transition into different homes during the lifespan of the property.

We believe that there are several potentially effective schemes on offer to tackle the issue of fuel poverty. However, they must be more effectively coordinated which will require leadership from the Welsh Government. With regards to the UK Government's Flexible Eligibility scheme, local authorities should liaise more closely with energy providers to maximise and target the use of Eco Flex money to target those that need support the most including within the PRS. In this context, we believe that it is essential for local authorities to work together or to work with external organisations to maximise an efficient and well-coordinated delivery of funding to ensure those most at need receive the money.

The Welsh Government should consider tax incentives within its competence including Land Transaction Tax to improve environmental efficiency of homes within the PRS. In addition, the Welsh Government should change current taxation policy on relief for improvements. Current policy sees relief generally provided at the sale of the property for individual private landlords; this should be switched to relief against rental income to encourage and support more landlords to make improvements to their properties. On the subject of energy suppliers and the cost of energy, we would like to see the

Welsh Government reduce any barriers to entry for small energy producing companies and co-operatives, which will also enhance the green energy sector, simplify tariffs to end complexity in the market and enable people to have confidence that switching suppliers will result in the expected savings and to legislate to put an end to companies' powers to disconnect any home from gas or electricity as is the case with water supply.

**5. What steps the Welsh Government should take to ensure that new-build homes, as well as existing homes, are highly energy efficient to prevent them causing fuel poverty in the future.**

The Welsh Government should review the current stock of homes and plans to increase housing across the country, in order to develop a new tenure neutral house building strategy that ensures we have enough homes to meet the challenges of the future.

The RLA calls for a holistic approach which does not just consider the refitting of homes but takes into consideration the people living within homes. In order to tackle fuel poverty, the problem should be part of the Welsh Government's wider anti-poverty programme and should be open to all housing tenures. This holistic approach would consider the impacts of worklessness and welfare and benefits have on fuel poverty.

We would also be supportive of changes in the planning process to ensure a significant number of new builds were zero carbon by 2020 providing there was specific technical advice notices to support local authorities in the production of their development plans.

With any future policy implemented to ensure that new builds are highly energy efficient, we hope that central to any developments will be an improved emphasis on providing local jobs, training and support for local supply chains to ensure sustainability. The installation of low carbon heating and energy efficiency measures often uses local labour and the investment has the potential to boost employment and economic growth. There is also potential for longer-term benefits resulting from the lowering of energy bills which enable higher disposable income for domestic consumers and a reduction in running costs for business, the benefits of which can be spent elsewhere in the economy. The geographic spread of demand means that the

supply chains and manufacturers that support the energy efficiency industry are likely to be located in deprived communities and can provide sustainable jobs across Wales.

Thank you for taking our views into consideration. We look forward to reading your final recommendations.

Committee Chairs  
National Assembly for Wales

16 December 2019

Dear Chair,

### **Committee on Assembly Electoral Reform**

As you will be aware, the **Committee on Assembly Electoral Reform** was established by the National Assembly for Wales in September 2019 with a remit to examine the recommendations of the **Expert Panel on Assembly Electoral Reform**. I am writing to invite your views on the potential implications for Assembly committees of any change in the size of the Assembly.

In particular, we would welcome the views of your Committee on:

- Whether the current size of the Assembly has given rise to any implications or limitations for your Committee's work or the way in which you approach policy, legislative and financial scrutiny of the issues within your remit.
- How any recent or anticipated changes to the Assembly's powers or responsibilities, or the broader constitutional context, might affect your Committee's remit or how you undertake your role.
- Any implications an increase in the size of the Assembly might have for the work of Assembly committees, including the support services they receive.

We would also welcome information about how your Committee assesses the impact of its scrutiny work, and examples of effective scrutiny or missed opportunities. It would be helpful to receive your response **by Monday 27 January 2020**.



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I will be making an oral statement in Plenary on Wednesday 8 January 2020 to provide an update on the Committee's work. In the meantime, if you have any questions about the work of the Committee, or would find it helpful to meet to discuss these issues, please contact the Committee clerk, Helen Finlayson, at [seneddreform@assembly.wales](mailto:seneddreform@assembly.wales) or on 0300 200 6341.

Yours sincerely,



**Dawn Bowden AM**  
**Chair, Committee on Assembly Electoral Reform**

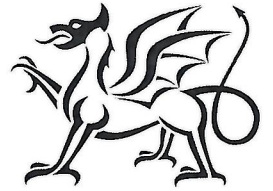
Croesewir gohebiaeth yn Gymraeg neu Saesneg.

We welcome correspondence in Welsh or English.



# Agenda Item 4.2

LESLEY GRIFFITHS AC/AM  
Gweinidog yr Amgylchedd, Ynni a Materion Gwledig  
Minister for Environment, Energy and Rural Affairs



Llywodraeth Cymru  
Welsh Government

Mike Hedges AM  
Chair  
Climate Change, Environment, and Rural Affairs Committee  
National Assembly for Wales

16 January 2020

Dear Mike

I wish to inform you of this year's dates for the Inter-Ministerial Group Environment, Food and Rural Affairs (IMG EFRA) meetings. These dates will be subject to change and are scheduled for the following dates:

- 13 January
- 17 February
- 23 March
- 27 April
- 15 June
- 14 September
- 26 October
- 16 November
- 7 December.

These meetings focus on key issues relating primarily to preparations for the UK's exit from the European Union. All four UK Administrations are represented.

I would also like to inform you the meeting scheduled for 25 November 2019 was cancelled due to the General Election.

Regards  
Lesley

**Lesley Griffiths AC/AM**

Gweinidog yr Amgylchedd, Ynni a Materion Gwledig  
Minister for Environment, Energy and Rural Affairs