

Julie James AS/MS

Ysgrifennydd y Cabinet dros Lywodraeth Leol, Tai a Chynllunio
Cabinet Secretary for Housing, Local Government and Planning



Llywodraeth Cymru
Welsh Government

Llyr Gruffydd MS
Member of the Senedd for North Wales
Chair, Climate Change, Environment and Infrastructure Committee
Ty Hywel
Cardiff Bay
Cardiff
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10 June 2024

Dear Llyr

Thank you for your letter of 8 May noting the correspondence the Committee had received from Councillor Joanna Protheroe in relation to the impact of the WHQS23 of local authorities' ability to reach net zero by 2030.

Please find below the clarification you have requested.

1. Can you clarify whether and, if so when, the Welsh Government has committed to a target for all social housing to reach EPC A by 2030? If a 2030 target was set, and has since been revised, can you explain the reasons for this?

The Welsh Government has never set a target for all social housing to reach EPC A by 2030. The previous standard was for all social housing to reach an EPC D (SAP 65), which has been achieved. WHQS23 replaced the previous standard as of 1 April 2024. The new target is for all social housing to reach an EPC A (SAP 92) in future and brings the existing social homes standard in line with the new build social housing standard, published in July 2021.

During the consultation process, the original proposal was for all social housing to achieve EPC A (SAP 92) by 2033. However, this was met by strong opposition due to concerns around practicality, cost, supply chains and skills, and the finalised standard took account of the strong feeling from across the housing sector. A summary of the consultation response can be found here:

<https://www.gov.wales/sites/default/files/consultations/2023-01/summary-responses.pdf>

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

The standard requires all social landlords to fully understand their homes and the steps required to meet EPC A. This evidence must be gathered by undertaking a whole stock assessment and producing individual targeted energy pathways (TEP) for each home by 31 March 2027. These individual TEPs will include the programme of improvements that will be required to ensure home reaches EPC A (SAP 92) in future. These requirements are informed by the early lessons learnt from the Optimised Retrofit Programme (ORP).

2. Can you clarify by when you expect all social homes to achieve EPC A?

Timescales will be informed by the outputs from the whole stock assessment and individual targeted energy pathways (TEP) which social landlords must produce for each home by 31 March 2027. These individual TEPs will include the programme of improvements that will be required to make that home reach EPC A (SAP 92) in future. It is only once these actions have been undertaken, will we be able to clarify when all social homes will achieve EPC A (SAP 92).

Given the need to drive investment and monitor progress towards our long-term target we have introduced an interim target for all social homes to have achieved an EPC C (SAP 75) by the 31 March 2030.

Neither the standard nor the requirement for social landlords to produce TEPs preclude any social landlord from early achievement of EPC A or similar across its housing stock.

All new build social homes being funded under Social Housing Grant are already achieving the energy performance certification of EPC A (SAP 92 or higher) or similar, such as the Passivhaus standard.

3. What assessment has been made of the impact of the standard for energy efficiency on the ability of local authorities with housing stock to meet the Welsh Government's ambition for a net zero public sector by 2030?

The standard requires all social landlords, including local authorities with housing stock to achieve EPC A (SAP 92). However, EPC A (SAP 92) does not automatically equate to a net zero carbon home. Homes that currently achieve EPC A are likely to become net zero operationally in future as electricity supply continues to decarbonise.

The Innovative Housing Programme (2017-21) has been providing valuable insight into tenants' behaviours in low and zero carbon homes and has proved that homes can be designed and built to achieve net zero carbon operationally.

However, the tenant's uses the home, specifically their energy use, has a significant impact on whether that home achieves net zero operationally. In a recent example at a new build development in North Wales which was built to EPC A, two identical homes heating bills were £50 per month and £300 per month. Based on the monitoring sensors installed in both homes, the social landlords could attribute the variation to the tenant's behaviours. After the social landlord engaged with the tenant and with assistance from other tenants in the same development, the tenant was able to greatly reduce their energy consumption, their bills and the carbon emissions from the home.

Energy use by residents in council rented housing and social housing is out of scope of the reporting against the ambition of being a net zero public sector by 2030. The Welsh Public Sector Net Zero Carbon Reporting Guide is available here: [Welsh Public Sector Net Zero Carbon Reporting Guide \(gov.wales\)](#)

In relation to the error noted in the introductory chapter of the WHQS23, a correction has been made to the published document. I hope the above information provides the necessary clarification the committee required.

I am copying this letter to John Griffiths MS, Chair of the Local Government and Housing Committee and to Councillor Joanna Protheroe, Chair of the Vale of Glamorgan Council's Corporate Performance and Resource Scrutiny Committee.

Yours sincerely

A handwritten signature in blue ink that reads "Julie James". The signature is written in a cursive, flowing style.

Julie James AS/MS

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