

Bron Afon



Welsh Housing Quality Standard 2023

Compliance Policy



Introduction

The Welsh Housing Quality Standard 2023 (WHQS23) came into effect on 1st April 2024. It aims to build on the positive outcomes of the previous Standard (WHQS 2002), ensuring the quality achieved with WHQS 2002 is maintained and further improved. WHQS 2023 is a tenant focused Standard, designed to upgrade social homes in a way that contributes to positive health, education and wellbeing outcomes, while responding to impacts from, the wider world such as climate change and technical advancements in building fabric.

Bron Afon has taken a proactive role in contributing to the development and refinement of WHQS23, working in partnership with the Welsh Government and others in the Welsh social housing sector. We identified the key WHQS23 focus is on:

- More customer engagement and involvement
- Addressing the climate emergency and taking action
- Being open about reasons for decisions and actions by social landlords
- Continuous improvements through regular reviews
- How the Standard connects with other laws like the Housing Health and Safety Rating System, the Renting Homes (Wales) Act 2016, and building and fire safety rules.


This guided our approach to preparing our business and our workforce for the implementation and delivery of WHQS23.



Our Policy

This policy explains how we will develop and implement WHQS 2023, considering our business position and Corporate Strategy. It will be regularly reviewed to ensure continuous improvement during the timeline of the WHQS.

In line with the WHQS 2023 (issued April 2024), this policy provides critical information on the following subjects:

1. Approach to WHQS, reflecting local resources and circumstances.
 2. Database/asset management software.
 3. Customer engagement.
 4. Independent verification.
 5. Compliance statements for new customers.
 6. Elements not measured, to be covered by detailed explanatory statements.
 7. Cost prohibitive activity.
 8. Target Energy Pathways narrative.
 9. Redevelopment, demolition and carbon.
 10. Community benefits.
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Our Approach to WHQS23

Strategic Direction


As well as proactively engaging with Welsh Government and others in the Welsh social housing sector, we prepared our workforce, with a particular focus on the implications of the new and additional requirements under the new Standard.

We developed a new Sustainable Asset Management Strategy which sets our strategic approach to WHQS23 implementation, to ensure the Standard is an integral part of our asset management, fully embedded in our planning and delivery.

The Sustainable Asset Management Strategy (2024 – 2029) is underpinned by four principles, which also apply to our WHQS23 approach: -

- Remain customer focused
- Optimise data intelligence
- Robust investment needs
- Effective and meaningful monitoring and reporting

This Strategy connects with our wider policy and strategic context, to ensure a cohesive business direction and that WHQS23 is embedded in our operations. All of which aligns with our current Corporate Strategy, and includes:

- Our DLO Vision (2023 – 2038), building our workforce to support the delivery of WHQS23 and beyond.
 - Decarbonisation of Homes Strategic Commitment (June 2021)
 - Customer Voice Strategy (2023 – 2026)
 - Retirement Living Strategy
 - Placemaking Framework
 - Annual business planning cycle
 - Development and Regeneration strategic direction
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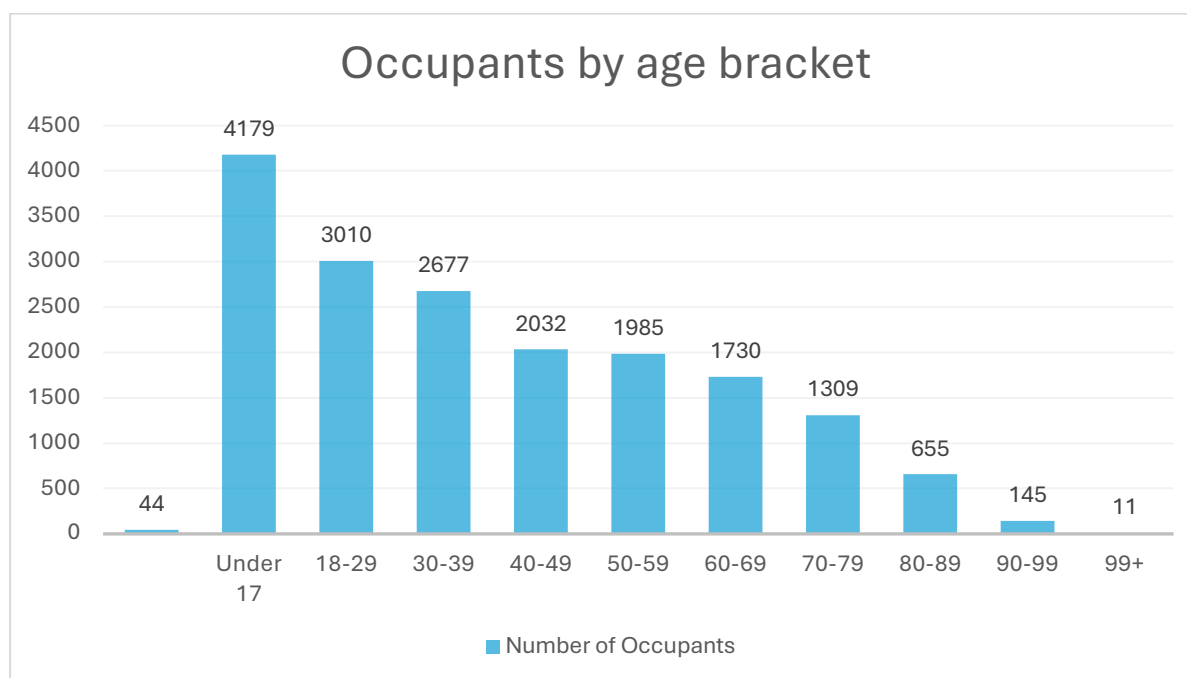
The objectives of this strategy are to deliver the specific outputs highlighted below, with the intended outcome of a more prepared, evidence-based, effective and efficient, innovative, and proactive approach to asset management.

Prepared	Effectively prepare the workforce and the business for the transition into the early stage of WHQS 23 implementation with a view to ensure the delivery of WHQS 2023 requirements and compliance with regulatory obligations.
Evidence-based	Enable an evidence based and long-term investment planning, with a focus on informing our approach to placemaking and regeneration to benefit our customers and communities.
Effective & Efficient	Demonstrate how our homes are performing against financial and sustainability measures, as well as delivering value for money by undertaking and reviewing asset grading/performance.
Innovative	Maximise the use of technology and innovation, including ways of working, funding approach, and innovative financial tools, to increase sustainability of services to customers.
Proactive	Reduce the demand for, and cost of, reactive services through structured and sustainable investment in our homes and estates.



1. Our baseline and local challenges

We are the largest private landowner and social landlord in Torfaen. Almost 18,000 people live in our properties, with around 24% under the age of 17. The overall population in Torfaen is projected to increase by 5.5% by 2043. Significantly, the number of people over 65 is expected to increase by 28% and the number over 85 by 70%. Our assets have a major role to play in the health, wellbeing and prosperity of our customers today and in the future.



Based on our current data, Table 1 shows the count of property age by type and Figure 1 shows the percentage of the stock by age and type.

Dwelling Age.	Detached	Semi-Detached	End Terrace	Mid Terrace	Maisonette	Flat	No Type Data	Total
No Age Data	-	-	3	3	-	3	21	30
Pre 1930	3	31	35	107	-	11	-	187
1930 to 1949	3	546	111	166	-	65	-	891
1950 to 1982	42	804	1,192	1,841	182	2,546	-	6,607
1983 to 1995	2	23	33	28	-	120	-	206
1996 Onwards	5	40	14	19	-	83	46	207
Total	55	1,444	1,388	2,164	182	2,828	67	8,128

Table1 – Number of properties per age per architype

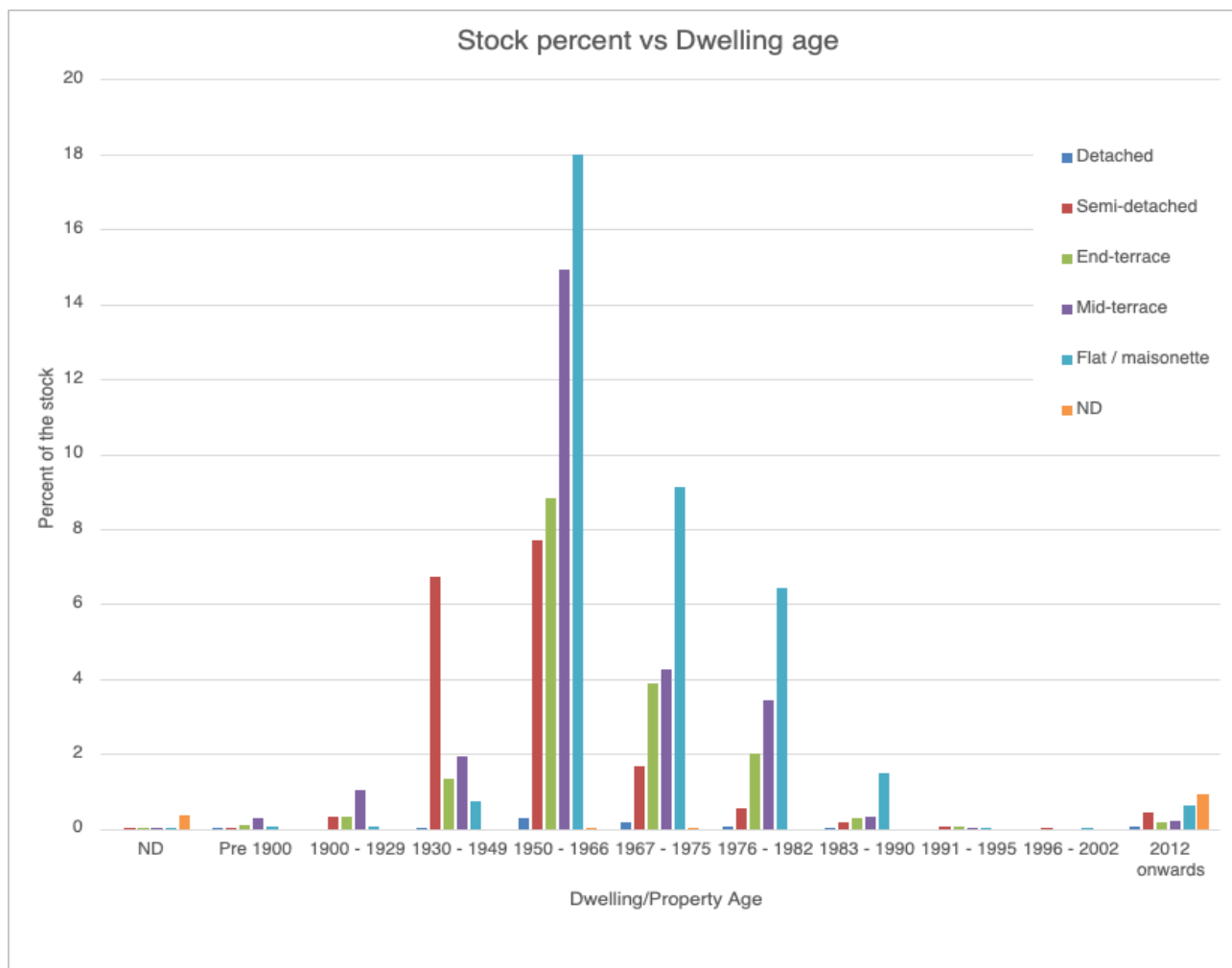


Figure1 – Proportion of properties per age per architype

Our assessment of stock data against the WHQS23 decarbonation elements shows most of our properties have average SAP and Environmental Rating band C and D, as per Table 2 and 3 and Figure 2 and 3.

SAP Band	Percentage
A	1
B	2
C	48
D	40
E	5
F	0
G	0
Unknown	5
Total	100

Table 2 SAP Bands proportion of all stock

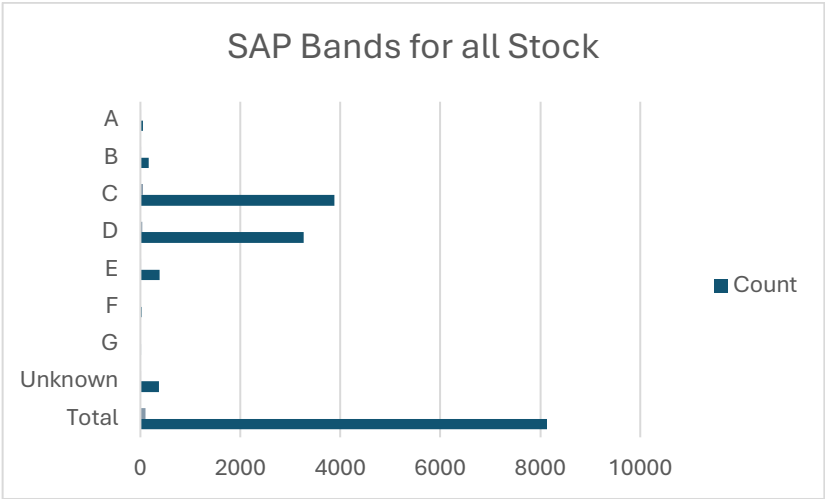


Figure 2 SAP Bands count for all stock

EI Band (Calculated)	Percentage
A	0
B	5
C	44
D	36
E	9
F	0
G	0
Unknown	5
Total	100

Table 3 EI Bands proportion of all stock

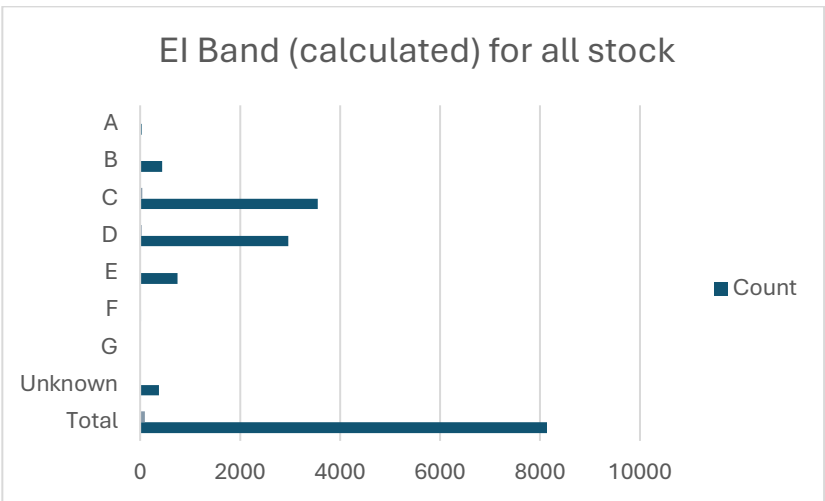
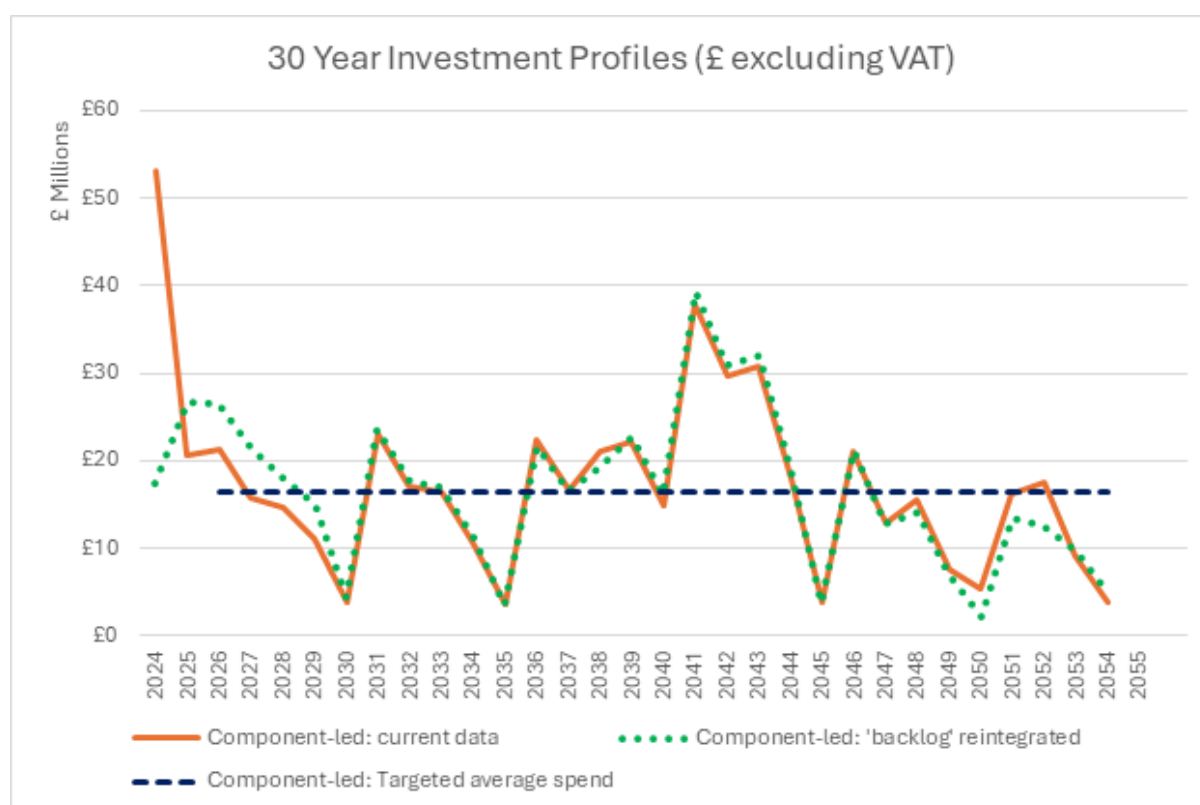


Figure 3 EI Bands count for all stock

Based on our current stock data, of which 90% is 5 years old or less, we fully understand the significant component replacement requirement and the level of capital investment needed to deliver. Through the implementation of the Sustainable Asset Management Strategy, the outstanding component replacement needs have been rationalised, and reintegrated into a revised, sustainable delivery programme. Figure 4 below shows the investment profile, based on current cost assumptions, before and after the rationalisation of the outstanding component replacement, and an indication of the average spend over the 30-year period.



The profile of actual investment will be continuously reviewed to maximise Value for Money and technological advances. Part of our dynamic approach to delivering this Asset Strategy and business plan will include routine data quality improvement and analysis and incorporate WHQS23 requirements.


2. Asset Management Software

Our asset management system, Apex, is provided by Rowanwood Professional Services Limited. Apex is a well-established Housing Asset Management system specifically designed around the needs of housing providers in England, Scotland and Wales. APEX has been a 'cloud-based' system since 2023.

This software product supports a variety of asset data management. It hosts the stock condition database and enables data collection from properties (including stock conditions, energy performance, and HHSRS). It enables the whole stock assessment, including against WHQS. Our surveyors use the associated Rowanwood Survey Manager mobile app to collect data on-site. The software also provides the main platform for the management and development of medium- and long-term investment plans.

The software can hardcode our interpretation of WHQS into a rule-based algorithm. This helps ensure consistent compliance checks for each property. It also makes compliance reporting more reliable and less subjective, as the system keeps a history of all quality checks, which can be traced back to the specific tests used.

In addition to Apex, we introduced Intelligent Energy, a product developed by SAVA, which is compatible with APEX. SAVA's product is specifically designed to enable visualisation of energy efficiency and carbon emissions of the whole housing stock. It can also drill down to specific components or property attributes such as wall finish, roof type etc. Intelligent Energy is also a modelling software, where properties can be selected for specific energy improvement measures and we can set a target energy level or carbon output level. This was valuable for our first iteration of Whole Stock Assessment and Target Energy Pathways, required under WHQS23.



3. Our Customer Engagement

Our approach to customer engagement and involvement aligns with our Customer Voice Strategy. Our WHQS23 Communications and Engagement Plan is designed to ensure that customers feel fully informed, involved, and supported throughout the implementation of the Standard. This section summarises key elements of the Plan.

By communicating clearly and engaging appropriately with our customers, our aim is for customers to understand the benefits of the WHQS 23 objectives and work with us on the implementation in their homes. This will help us achieve value for money, reduce avoidable repairs and build trust and satisfaction as we work on improving the quality of our housing stock.

3.1 WHQS23 Communications and Engagement Plan Objectives


- Awareness: Ensure our customers are aware of the WHQS 2023 and understand what it means for them.
- Inform: Provide clear information about how/when these standards will be implemented in their homes.
- Engagement: Involve customers where they can influence and inform the decision-making process to changes in their homes.
- Feedback: Use our existing channels for customers to share feedback.
- Support: Signpost customers to support and information during the programme of works.
- Value for Money: We intend to demonstrate how our value for money strategy informs how we will achieve greater financial value so we can reinvest in homes and the communities we work in.

3.2 Audiences

- Key Audience: Customers.
- Other relevant Audiences: Colleagues, Board, TCBC, partner organisations.

3.3 Communication Channels

We will take a multi-channel approach to communicating and engaging with our customers, colleagues and stakeholders. This includes website, intranet, social media, newsletters and face to face. We have partnered with TPAS and other Housing Associations to co-create and produce content and information for customers to help keep them informed and updated about WHQS 23 and what it means for them. All our messaging will be tailored to the relevant audiences, and we will use a mix of print, graphics and video content.




3.4 Engagement

Engagement activities will be led by our Customer Voice team with support from Community Housing Officers, Independent Living Officers, and Support Teams. We will use existing platforms, forums and community activities to listen to our customers and gather feedback and insight.

3.6 Feedback and Support

We will ensure customers can share their feedback and access support in several ways so they can choose their preferred method of contact. We will use existing platforms including digital channels, face to face contact and regular updates using our communications channels.

3.7 Evaluation

- **Monitoring Feedback:** CV team to review customer feedback from the platforms they use to share feedback with us. These include: Your Voice, Rant & Rave, Complaints and focus groups.
 - **Trust & Satisfaction Survey:** Annual survey – we will monitor for changes in results and sentiment related to WHQS programme.
 - **Measuring impact:** We will use our existing engagement and communications channels to analyse and understand the impact of the communications and engagement plan. Including but not limited to social media analytics, newsletter open rates, Rant & Rave scores, Website data, focus group sentiment.
 - **Adjustments:** We will regularly collate and review customer feedback and adjust messaging if required. We will use ongoing feedback to make necessary adjustments to the engagement strategy.
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4. Independent Verification

Independent verification of our WHQS23 compliance will be incorporated into our financial business planning cycle and WHQS reporting cycle. The annual key milestones are:

- February: Budget proposal for Board's approval.
- March to May: Refining Business Plan based on Board's approved budget; checking and reconciling the proposed plan vs assumptions.
- June - Stress testing and sensitivity analysis of the Business Plan.
- July – To Board for approval.
- August - Submission to Welsh Government.

The initial review will take place during the first quarter of FY 2026/27, two years after the Standard comes into effect, as specified under WHQS23.

We identified three options as suitable bodies to undertake an independent verification. We want to maintain our ability to select a different option or multiple options at each of the scheduled independent verifications, as we feel this will offer different perspectives to help us improve as we progress with our delivery of the Standard.


Option 1: A customer focus group.

We will bring together a customer focus group in line with our Customer Voice Strategy. This will form part of our on-going customer engagement and involvement in the delivery of WHQS23.

Option 2: Use of an external consultant(s).

As part of our cyclical Governance and Assurance activities, Bron Afon has an existing arrangement for internal audits and independent assessments for a wide range of business operations, such as Health & Safety and Landlord Compliance. The WHQS23 independent verification can be included as part of this arrangement. The benefit is that existing consultant/auditor is familiar with Bron Afon's wider operational context but is not directly involved in the delivery of the Standard.

Where appropriate, particularly where 'industry specialist' skills and knowledge are necessary, we will engage 'experts' to provide an additional level of independent assurance on specific activities on a cyclical basis.



Option 3: Another registered social landlord or a similar size of stock

A neighbouring social landlord of a similar stock size is likely to be facing similar challenges to Bron Afon. This option allows an opportunity for collective learning and improvement, which could optimise positive outcome for local communities.



5. Compliance Statement for New Customers

Within our customer information pack at the point of re-letting, we will provide a compliance statement in the format included in the Appendix to this Policy.

The statement will clearly explain the purpose of WHQS23, the deadline for meeting it, what it includes, where the home meets the Standard, and any areas that still need improvement, along with reasons why.



6. Elements not Measured

There are five elements included in WHQS23 that are not formally measured. Our commitment and approach to progress the delivery of these elements are as follows.

6.1 Element 3d: Landlords must carry out a Whole Stock Assessment and produce Target Energy Pathways for their homes.

Bron Afon took part in the Welsh Government's study to pilot its guidance for WHQS Part 3 'Affordable Warmth and Decarbonisation'. The final report (May 2024) was provided to Welsh Government following the pilot study to help further develop the guidance for Welsh Social Landlords.

The table below summarises our progress on the Whole Stock Assessment and the development of our Target Energy Pathways, following our completion of the Welsh Government's Pilot.

Relevant section of guidance	Sub-section	Current status	Future requirement
Whole Stock Assessment	Data quality assessment	Extensive assessment undertaken	Ongoing process to be continued by Bron Afon
	Data quality improvement plan	Principal data issues and remedial measures identified.	Ongoing process to be continued by Bron Afon
	Summary of current energy efficiency and other stock characteristics	Simple summary completed. Some more in depth analysis likely to be required but achievable by Bron Afon staff	Ongoing process to be continued by Bron Afon
	Software	Essential tools in place.	Complex data processing may require additional software
	Skills	Skilled staff in place but may require analytical support	Complex data processing likely to require external support
Target Energy Pathways	Initial Target Energy Pathways	Complete for 95% of stock	Implementation of data DQIP will resolve remaining 5%
	Target Energy Pathway (with target date)	Principles of recommended cost optimization approach to scheduling established based on integration with expected capital program	Complex data processing likely to require additional software and/or analytical support
	Target Energy Pathway narrative	Draft included in report	Ongoing process to be continued by Bron Afon
Sequencing housing stock improvements.		Approach to sequencing integrated into TEP scheduling	Complex data processing likely to require additional software and/or analytical support
Reporting to Welsh Government		Requirements described. Measures identified for 95% of stock. Target dates dependent on completing TEPs	Complex data processing likely to require additional software and/or analytical support

The results from this pilot have been used to create an asset investment program. We will continue to improve our target energy pathways. Every year, we will review our entire stock and update our target energy pathways as part of our investment and business plan.

6.2 Element 6d: Homes should suit the specific requirements of the household.

Our Equality, Diversity, and Inclusion Policy, confirms our commitment to “create an inclusive and supportive environment where everyone from all backgrounds feels valued, able to be themselves, can perform at their very best and knows their unique contributions are welcomed and valued”.

Guidance and advice is available to everyone to encourage and support colleagues to consider and understand different cultures and religions, so that all our services for customers are sensitive, respectful, and open-minded.

All our new policies, strategies, procedures, and changes to services including delivery app undergo an Equality Impact Assessment. This is a risk-based assessment, to ensure equality, diversity and inclusion for our customers, communities and colleagues.

6.3 Element 6e: Disabled and older people’s housing requirements

We are committed to the assessment and delivery of adaptations to homes for disabled customers through our Occupational Therapy Service. We remain a critical partner for Torfaen County Borough Council (TCBC) and continue to work collaboratively with them on a borough-wide approach to provide accessible housing and enhance housing opportunities for disabled customers requiring accessible/adapted homes.

As we progress the implementation and delivery of WHQS23, we will continue to align our Occupation Therapy Services with WHQS23 delivery. This service already sits within in the Asset Strategy and Investment department.

We have taken steps to understand and respond to the future housing demand for older residents. Key considerations:

- The overall population in Torfaen is projected to increase by 5.5% by 2043. Significantly, the number of people over 65 is expected to increase by 28% to 24,643 people and the number over 85 by 70% to 4,186 people.
- Applying these same projections to the current Bron Afon demographic means that by 2043, there could be up to 3,767 customers aged 65 or over, of which 1,117 could be over 85.




We will take a strategic approach to ensure we can offer appropriate and desirable services for older residents in our communities, in the form of a long-term deliverable Retirement Living Scheme.

6.4 Element 8b: Attractive Outside Spaces

Under our Estate Management Policy, we are committed to creating communities where people feel proud to live and work. Our effective and appropriate estate management is led by the following principles

- We know that how we manage our estate affects the physical and mental well-being of communities. This policy aims to create lasting and sustainable improvements, not just meet basic maintenance needs.
- Raise aspirations of residents living and working in our communities. Work together to create safe and attractive environments in line with the principles of our Involvement and Engagement Strategy.
- Create a sense of pride in where we live and work. Promoting proactive, positive and practical actions for improvements.
- Create a culture of respect, responsibility and ownership of estates. Promote shared stewardship and management with customers, residents, colleagues and service delivery partners and contractors.

The implementation of the Estate Management Policy and partnership working will enable progress on the delivery of attractive outside space for our customers and communities. This will apply to:

- Land owned by us that is not subject to a lease or other agreement that gives maintenance responsibility to the leaser.
 - Land owned by us associated with our blocks of flats, but not under the control of a single lease or tenancy agreement i.e. common parts.
 - Land associated with a tenancy or a lease that we hold or have entered into or is let to us by a third party.
 - Un-adopted highway and other hard surfaces on land owned by us.
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6.5 Element 8c: Biodiversity

We are committed to contributing towards a sustainable Wales as defined under the Well-being of Future Generations (Wales) Act 2015, and to proactively take actions to address the climate and nature emergency declared in 2019.

Urban Grassland

Working in partnership with the council, we identified green spaces considered to be suitable areas to promote biodiversity enhancement in the communities. In line with our sustainability aspiration, we want to play our part in supporting Torfaen and Wales to protect and enhance our natural environment.

This initiative involved an extensive community consultation, with information provided to residents and communities likely to be affected. We asked for their views on potential issues or concerns as well as support for the project. Following feedback this initiative has been in place since 2021. One of our grasslands is recognised as a local wildlife site, a 'Site of Importance for Nature Conservation (SINC)' for Torfaen.

Woodlands and tree management

Almost 4.5 hectares of our woodlands are being managed as part of the National Forest Wales Network. This Welsh Government initiative aims to:

- Stretch the length and breadth of Wales, making it accessible to everyone
- Be a real community venture with new woodland being planted by communities, farmers and landowners across Wales.
- Create new areas of woodland as well as restoring and maintaining Wales's unique and irreplaceable existing woodlands.
- Protect nature and address biodiversity loss. Support the health and wellbeing of communities.

We will continue to proactively manage our woodland habitats in a way that supports the connectivity of forest of Wales.

Our works to protect and enhance woodlands include planting of new trees on our lands and the proactive management and control of Ash Dieback affecting our trees. We have been a member of the 'Branching Out' partnership since inception and work with our partners to enable tree planting on our land, to help increase ecological connectivity within Torfaen.



Partnership approach

We are involved in a number of partnership initiatives, with many on-going activities. We are also a proactive member of the Local Nature Partnership for Blaenau Gwent & Torfaen. We are open to opportunities for collaboration with community groups, local and national charitable organisations and government authorities to enable real impacts to the local natural environment and benefits for our communities.

Evaluating the benefits

We have ongoing discussions with the council on the monitoring and evaluation of biodiversity values on our land, including working with them to enable an ecological assessment of our biodiversity areas.

6.6 Digital Connectivity

We are committed to addressing digital exclusion and ensuring equitable access to digital opportunities for all our customers. Recognising digital connectivity as a social justice issue, we are adopting an innovative and proactive approach to bridge the digital divide. Through our multifaceted approach, we will promote and deliver equal access to online opportunities and the benefits of the digital age.

We will continue to collaborate with local authorities, telecommunications providers, and technology companies to expand and enhance digital infrastructure throughout Torfaen. This initiative includes:

- Installing high-speed broadband in all residential properties managed by Bron Afon.
- Ensuring that new developments and major refurbishments include -digital connectivity solutions.
- Provide reliable and fast broadband services in our communal spaces.

To alleviate financial barriers to digital access, Bron Afon will:

- Identify internet service providers which offer subsidised broadband packages for low-income families and individuals.
- Explore funding options for the purchase of essential digital devices such as computers, tablets, and smartphones.

We believe that access to digital technology alone is not enough. We work with partners to implement comprehensive digital literacy programs to empower our customers with the necessary skills and confidence to navigate the digital world. These programs include:



- Offering free digital skills workshops and training sessions covering basic to advanced topics, such as internet safety, online banking, and job searching.
- Creating a network of digital champions—trained volunteers who can provide one-on-one support and mentoring to tenants.
- Collaborating with community organisations to promote digital literacy and education initiatives.

Bron Afon will foster a culture of digital inclusion by:

- Establishing a Digital Inclusion Project to oversee and drive the implementation of digital connectivity initiatives.
- Conducting regular surveys and consultations with tenants to identify and address specific digital needs and challenges.
- Creating digital inclusion hubs in community centres where tenants can access resources, attend workshops, and receive personalised support.



7. Cost Prohibitive Activity

As the compliance assessment introduced under WHQS23 is markedly different from its predecessor, we will establish a way to implement the new assessment approach.

It should be noted that at the time of the draft of this first Compliance Policy, there is a pilot on-going to trial the assessment and data collection approach, with involvement from a number of Registered Social Landlords and Welsh Government. The deadline for the first statistical WHQS23 data return has been delayed by WG to 16th May 2025. We will note the outcome from the pilot and will adopt a practical approach to data collation and compliance assessment, to meet the deadline for the first statistical return.

There are seven elements of the WHQS23 which can be assessed as 'Conditional Pass' due to 'Cost Prohibitive'. Part 3 (Affordable Warmth and Decarbonisation) of the Standard, state that some properties can be assessed as a 'Temporary Fail' due to 'current cost prohibitive'.

We will develop an asset assessment cost model as part of defining what we accept as 'Cost Prohibitive' which will be based upon our wider financial viability model and value of the asset itself. We will include this in our annual assessment approach of WHQS23 compliance. Once the cost model is established, We will update this Compliance Policy.



8. Target Energy Pathways Narrative

As part of the pilot to develop guidance to Whole Stock Assessment and Target Energy Pathways (TEPs) for Welsh Social landlord, completed in May 2024, all the energy efficiency measures that can theoretically be installed in our stock have been calculated for 95% of the stock. The other 5% of data is subject to data quality improvements.

Some of the most important statistics emerging from analysis of the results of this modelling, tell us:

- While 97% of the stock can achieve the SAP 75 target, only 29% can achieve a SAP of 92.
- Due to the current limitation of the current modelling software, particularly on SAP calculation, if an assumption is adopted that dwellings within 3 SAP points of the SAP 92 will achieve the target, then 51% of the stock have potential to achieve this target.

We provide a short narrative based on the pilot study below. This will be updated as we further improve data quality and processes.


8.1 Approach to generating TEPs

We used energy stock modelling software to run a Net Zero scenario using SAP 2012 default carbon factors. The modelling identified improvement measures that would achieve 2,183 dwellings reaching the target SAP rating of 92 or more (42 already achieved this target) and only 230 dwellings failing to achieve SAP of 75.

The measures specified have been matched to component replacement dates where possible to coincide with likely capital programmes thereby maximising operational efficiency and delivering a future installation profile. It is likely that many iterations of this process will be required to identify and remove or replace impractical measures, vary installation dates to smooth the installation profile and match to available resources.

8.2 The asset and modelling systems used to gather, record and process information

Sava Intelligent Energy is used to identify energy efficiency improvement measures directly from data stored in the Rowanwood Apex Asset Management System which also holds component type and life expectancy data to support the scheduling process. The scheduling process will be undertaken independently from these systems. The software to be used for this task has yet to be determined.



8.3 A data quality improvement plan

Within the context of the development of Whole Stock Assessment and Target Energy Pathways required under WHQS23, the principal data quality domain concerns are completeness of asset data (i.e. missing data) and accuracy. The extent of the issue has been quantified for energy efficiency data but for component data essential to the scheduling process has yet to be quantified.

Sava IE provides a useful tool to identify energy efficiency data quality and this together with data from the WHQS WSA and TEP pilot project will be used to set targets for improvement.

We have identified a range of approaches to filling the data gaps including:

- Desktop exercises using local colleague knowledge where attributes of missing data are obvious to them
- Desktop exercises using imagery
- Inferences from other internal data sources
- Surveys where the above methods do not deliver the necessary data.

Component data completeness will be quantified for all components associated with energy efficiency improvement measures and a similar approach undertaken to filling data gaps discovered.

Accuracy concerns will be addressed by a random survey collecting data for comparison to existing records. Intelligence gained from the results of this exercise will be fed back into the data and collection process to improve accuracy for any issues identified.

The single serious issue of consistency is the two possible versions of SAP available to us – the EPC RdSAP and the Sava IE RdSAP. We will report the higher of the two values as most higher values reported by Sava IE are associated with real improvements and lower values associated with reduced data inputs compared to the EPC. As soon as Sava IE software is upgraded, we will review whether reporting using SAP 10 is appropriate.

8.4 Information on proposed measures for each significant archetype of property and outline the rationale behind their approach

As we are using energy modelling software to develop TEPs, archetype-based approaches are not appropriate at the mid-stage of TEPs the organisation has currently reached. It is, however, likely that similar TEPs will emerge for archetypes as the process of scheduling and sequencing TEPs develops.

8.5 Information where homes will not reach the targets set out in the standard

The table below summarises the results of the Sava IE modelling. The information below, assumes all measures identified by Sava IE can be implemented. In practice this is likely to reduce as barriers to retrofit are identified during retrofit assessments.

	SAP75	% (of dwellings modelled)	SAP92	% (of dwellings modelled)	EIR92	% (of dwellings modelled)
Dwellings able to meet target	7520	97%	2225	29%	3393	44%
Dwellings not able to meet target	230	3%	5525	71%	4357	56%
Dwellings close to achieving target (within 3 points of relevant target)	131	2%	1724	22%	1051	14%
Dwellings close to or achieving target	7651	99%	3949	51%	4444	57%
Dwellings not able to meet or get close to target	99	1%	3801	49%	3306	43%
Total dwellings modelled	7750		7750		7750	
Total dwellings not modelled (due to data quality issues)	378		378		378	
Total dwellings in stock	8128		8128		8128	

The modelling indicates that 97% of dwellings can achieve SAP of 75. This improves to 99% if a margin of 3 SAP points is allowed for improvements in technology and/or data input accuracy.

The SAP 92 target, however, is far more challenging with only 29% of dwellings able to meet this target, increasing to 51% if a margin of 3 SAP points is allowed for improvements in technology and/or data.

9. Carbon Consideration in Redevelopment and Regeneration

9.1 Whole Life Carbon Assessments (WLCA)

For any projects redeveloping or regenerating existing properties, we will expand our current assessments for operational emissions to include embodied emissions (to satisfy Building Regulations and grant funding requirements). This means we will conduct 'Whole Life Carbon Assessments' (WLCA) following the Royal Institute of Chartered Surveyors (RICS) WLCA Standard to measure both embodied and operational carbon emissions throughout a building's entire lifecycle.

The RICS Standard for WLCA's set out how embodied and operation carbon emissions are measured throughout the whole life of a building, i.e. the carbon emissions from the point the extraction/production of materials used to construct the building occurs to the time when the building is deconstructed/demolished. (Note: the RICS standard actually includes the assessment of carbon emissions associated with the non-physical processes i.e. surveys, design works etc. however for most building these are generally assumed to be negligible).


As detailed in section 3.8 of the RICS Standard, some of our projects may fall under the definition of 'smaller projects' i.e. those involving 10 dwellings or fewer (as defined in the Standard). In these instances, the Standard sets out that it is allowable to only assess upfront and embodied carbon (modules A1-A5, B1-B5 and C1-C4), with other mechanisms used to assess and reduce operational carbon (Module B6). In these situations, we will continue to use the current methodologies we already use for assessing and measuring operational carbon emissions.

9.2 Analysis and decision-making.

As we continually evaluate the performance of our existing properties in terms of both the financial measures (generally using Net Present Value methodology) together with a wide range of qualitative data, we will identify those properties which are poorly performing and which need significant investment to improve their performance – financially, qualitatively, carbon reduction and cost in use.

In these cases, we will also consider redevelopment/regeneration of these properties. To enable us to make informed decisions about whether we improve the existing properties or undertake redevelopment we will also undertake WLCA's of the different options and use this in our analysis.

We do not envisage WLCA to be the deciding factor of which option we choose. Instead, it will be an important factor of a range of factors, which we will analysis to help us in our decision-making whether to improve or redevelop the properties.



Whichever option we choose for our various properties, undertaking WLCA's will help inform us on the most suitable products, methods, etc to reduce embodied and operational carbon emissions from our properties in the future.

9.3 WLCA tools and training

Currently, the housing and wider construction sector is learning, developing and adapting to gain a greater understanding of carbon emissions from our buildings. The sectors are also learning and adapting to use the tools, processes and methodologies for undertaking and using WLCA to make informed decisions to reduce carbon emissions. This applies equally to our in-house teams as well as the consultants we engage. We will provide training for our colleagues to enable them to fully understand the requirements and be better placed to use the tools to undertake (either directly or via specialist consultants) WLCA's, as well as analysis and interpret the data and outputs to help inform our decision-making.



10. Community Benefits

As part of our procurement process, we set a requirement from each of our contracted suppliers to commit to a 1% rebate to support community activity.

Our Community Benefits Panel was launched in 2024, with a role to oversee the allocation and use of the rebate funds received through the procured contracts.

The funding is awarded through 3 main channels:

1. 'Pitch for Pounds': Where community organisations/small charities apply for funding towards a specific purpose.
2. Employing apprentices: Giving local people training and job opportunities
3. Ad-hoc requests: Where staff members can request funding on the behalf of community groups in need that they are supportive of.

Any requests for ad-hoc funding will be reviewed and scored by the Panel based on the following criteria:

- Bring added value to the communities we serve.
- Importance to the communities we serve.
- Providing opportunities to local people (training, employment, work experience, supply chain procurement).
- Meeting a specific current/temporary need within the communities we serve (e.g. food banks during a cost-of-living crisis).
- Increases health & wellbeing of the communities we serve.
- Increases provisions for young people living within our communities.

Apprentices:

Using our workforce planning and equalities data we review our apprentice needs annually. In 2024, our approach to recruitment was to partner with TCBC and local training providers to recruit from the pool of engaged but harder to reach Torfaen based young people signed up to their engagement projects. In addition to this we focussed on addressing the gender gap within our trades workforce by recruiting women only.



An Appendix to WHQS23 Compliance Policy: The WHQS23 Compliance Statement Form

Statement of Compliance with Welsh Housing Quality Standard 2023

Property Address	
Unique Property Reference Number	
Property Type	

Introduction

The Welsh Housing Quality Standard 2023 (the Standard) sets the target for the condition of all social housing in Wales and will be implemented from 1st April 2024. The Standard was originally introduced in 2002 and has been successful in raising the quality of social homes in Wales.

The Standard sets the requirements that are grouped into 8 parts

Part 1: Homes must be in a good state of repair.

Part 2: Homes must be safe and secure.

Part 3: Homes must be affordable to heat and have minimal environmental impact.

Part 4: Homes must have an up-to-date kitchen and utility area.

Part 5: Homes must have an up-to-date bathroom.

Part 6: Homes must be comfortable and promote wellbeing.

Part 7: Homes must have a suitable garden.

Part 8: Homes must have an attractive outside space.

A home will meet the Standard when all relevant elements under all the 8 parts are achieved. It is recognised that some elements of the Standard are not applicable to all homes. It is also recognised that not all homes will be able to achieve some elements for various reasons.

Further information on WHQS23 can be found on the Welsh Government website.

This Statement of Compliance provides the most up-to-date information at the point of reletting of the property at [ADDRESS], with regard to the status of its compliance with WHQS23.

Compliance Status

Compliance level (percentage)	%
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Elements of the Standard	Status (Partial compliance or Compliance)	Rationale (n/a, works being planned)
Part 1: Homes must be in a good state of repair		
Part 2: Homes must be safe and secure		
Part 3: Homes must be affordable to heat and have minimal environmental impact		
Part 4: Homes must have an up-to-date kitchen and utility area		
Part 5: Homes must have an up-to-date bathroom		
Part 6: Homes must be comfortable and promote wellbeing		
Part 7: Homes must have a suitable garden		
Part 8: Homes must have an attractive outside space		

Where elements are partially compliant, works will be planned as part of asset investment planning cycle, with the aim that the property is fully compliant for all elements applicable to the property by the 31st March 2034, as required under WHQS23.

Issued by:

Asset Strategy and Investment Department

Bron Afon Community Housing

Issue date: March 2025



Bron Afon

Everyone should have a place they are proud to call home • Dylai fod gan bob un le y maen nhw'n falch o'i alw'n gartref

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