

Appendix III - Feedback from the public consultation

- A number of respondents asked why para. 1.7 & 1.8 are duplicates.
This was an administrative error and no information had been lost.
- There was a query raised as to what Figure 1 was actually showing.
This has resulted in a refresh of the way the data is presented in the Strategy. Again, for Figure 2 an issue was raised in relation to the colouring of the maps. This has been reviewed with revisions to the way that the data is displayed.
- A respondent felt that the original 2022-2025 timescale was far too short.
We have reviewed the timescale and have extended this to be in line with the Council's 2030 'Net Zero' target. There will be annual reviews and updates as necessary.
- A number of respondents suggested different approaches to the way that the Strategy and the Action Plan are presented. Also, the many references to other Council strategy documents.
The reference to other strategy documents is used to highlight the corporate approach across the organisation and sets the backdrop of government strategy and the frameworks which a local authority must operate. The delivery of the affordable warmth strategy is not dependent on the other strategies.
- A respondent felt that that there was no evidence of adopting best practice from elsewhere in the UK or Europe.
The Strategy sets out the Council's approach which utilises national best practice, fabric first and whole house retrofit model. The Council is regularly participating in national forums where best practice is shared and is a member of the Association of Local Energy Officers (ALEO) and is a member of the Retrofit Academy.
- A respondent stated that they felt that the Strategy does not set any targets /volumes of activity or measurable objectives. Similarly, it does not set out how funding will be sort or allocated.
Due to the nature of government funding waves which have to be bid for in competition it is not possible to structure the report or action plan in that way. There is no annual grant paid to the Council to carryout a programme of improvement works. However , as a Council we have been very successful in recent funding rounds and have secured significant levels of funding for affordable warmth and energy efficiency measures. These programmes have a full range of targets, volumes of activity and measurable objectives and will be reported in the annual review of the strategy document.

- A couple of respondents queried the approach of trying to get developers and Housing Associations to deliver to a higher thermal quality housing ahead of any mandatory requirement as naïve, suggesting that builders build down to a standard, not up to an expectation and therefore Supplementary Planning Documents in advance of the adoption of the new Local Plan. A further concern was that trying to achieve the Council's Net Zero goal by 2030 may result in lost government investment by achieving Net Zero by 2030 instead of the Government's target of 2050.

The Strategy recognises that increasing standards outside of any mandatory requirement is a challenge, but an important part of the strategy is to work across multiple fronts to improve affordable warmth and energy efficiency. In response to lost investment the team are actively securing all sources of available government funding to improve the housing stock in Shropshire now and through to 2030 and beyond.

- A respondent felt that there were no details about how Shropshire Council plans to improve households' income.

Further explanation and detail have been added to the document to explain how the AWEE team working in partnership with the Council commissioned Keep Shropshire Warm Service, which includes income maximisation for fuel poor households, warm Homes Discount, state benefits and the most cost-effective energy tariffs.

- A respondent felt that the document contained no information about the current situation or baseline.

The Strategy does contain baseline data on fuel poverty in Shropshire (2020), EPC data, modelling costs in reaching net zero in Shropshire. The same respondent went on to say that they felt that there was insufficient information about how Shropshire Council intends to fund the delivery of the actions needed now and the changes needed in the future. The strategy has been amended to identify the specific funding streams Local Authority Delivery (LAD) and Home Upgrade Grant (HUG). Information has also been included on the Council taking the opportunity to bid twice for HUG 2 funding and that we were also successful standalone bid plus joining a consortium bid with Midlands Net Zero Hub. Information has also been provided in the Strategy on how the Council is investing resources into the Retrofit Academy Infrastructure Partnership alongside Telford & Wrekin and Herefordshire Councils.

- A respondent commented on the format of the report and suggested that the Action Plan should not be in the Appendix, and that it should immediately follow the introduction.

The Action Plan is standalone and referred to as an appendix and follows council guidelines.

- A respondent suggested that the priorities for action in the plan, listed under the three objectives should be merged in to the Action Plan to make it more credible and easier to monitor.

Again, the Action Plan is seen as a standalone document and has been retained as an Appendix.

- A query was raised to say that Objective 2 would benefit from a financial balance sheet of cost estimates and funding possibilities for each year of the strategy to determine what breadth of pathway is possible.

Due to the complex funding regimes and the variation of the reporting requirements between each wave of funding it is not possible to present cost estimates in a meaningful way. However, all funding streams have detailed project plans, which have detailed financial forecast based on specific energy efficiency measures, which complement our fabric first retrofit model and would therefore use this to benchmark our success on our pathway to net zero. It is also very hard to predict future government policy which is highlighted by the closedown of the Local Authority Delivery scheme which supports on gas homes. At the time of writing this scheme is due to end the end of September 2023, the government has announced no additional support for on gas properties going forward.
- A suggestion that the use of words such as 'ongoing' should stop, and their meaning be more precisely defined to make progress measurable.

Where possible and where appropriate the use of 'ongoing' has been limited and specific timelines used.
- A respondent said that the information on pages 4 -16 should become Appendices because they contain the legal and research background underpinning the strategy.

The Strategy is set out and written in accordance with council guidelines. The legal and research background is a main part of the Council's strategy.
- A respondent states that that Strategy refers to ECO4 a government initiative for insulating homes for poorer households and which Shropshire Council has adopted in its ECO 4 flexible eligibility statement of intent in July 2022.

The Council continues to adopt and support funding for energy efficiency measures to eradicate fuel poverty through ECO4 flexible eligibility statement of intent. An updated statement was published on 18 July 2023 and is available here <https://next.shropshire.gov.uk/media/50qn5vdj/shropshire-council-eco4-flexible-eligibility-statement-of-intent-18-july-2023.pdf>

A new website to help local residents to engage in the scheme will launched on 31 July 2023 www.shropshireflex.org
- A respondent urged the Council to tap into the new funding initiative ECO+, a £1bn scheme focusing on installing loft and cavity wall insulation. which the government is due to unveil in April and will run alongside ECO4 and advise that cavity wall insulation should be suitable and good quality otherwise it can generate damp which creates problems in the future.

The Council is engaging in the newly named Great British Insulation Scheme (GBIS) and is being delivered alongside ECO4.

- A respondent referred to the Norwich Passivhaus Project, the winner of the 2019 Stirling Prize 100% social housing development for Norwich Council, comprising 93 Passivhaus homes spread across 7 blocks aligned in 4 simple rows on a traditional street pattern. On completion in 2019 it took the title of the UK's largest Passivhaus certified residential scheme. If this can be done in Norwich why not in Shropshire? They then went on to ask whether planning permission could only be given to builders in the private sector who are building to Passivhaus standards? Surely the fastest way to cut energy bills and carbon reduction is to ensure that from now on we only also Passivhaus build in Shropshire, becoming a leading Council!

In response the Council would welcome such a ground breaking scheme such as the Norwich Project in Shropshire. As outlined in the Strategy the Council will continue to maximise opportunities to bring external funding into Shropshire to fund a full range of fabric first retrofit improvements to our existing stock. At the same time working with our ALMO STAR and property company CDL to incorporate the latest energy efficiency and low carbon technologies in new build designs. To trial approaches such as Passivhaus and where possible look to scale this up in future developments.

- A respondent asked where the Councils acknowledgement of the larger pool of older properties that are either listed and/or in conservation areas? Properties that the Council imposes restrictions upon in terms of upgrading their energy efficiency? Properties that due to their town centre locations do not have the ground space for heat pumps? The respondent went on to say that this document [Sustainable Affordable Warmth Strategy] reflects the total lack of interest shown by the Council in addressing this issue, although I'm sure that there will be great enthusiasm for imposing penalties on properties not reaching EPC standards, should such a strategy be introduced in the future.

In response to these concerns, the Strategy provides a high-level overview of our intended approach to deliver an affordable warmth strategy across the entire council area. The Council appreciates that there are a number of intricate factors when delivering projects on such scale and complexity and that 'one size' does not fit all. The example provided will require an innovative approach utilising the available types of heating solutions that are currently available at this time and that these would need to be implemented within the current planning constraints applicable to each locality.

In regard to the point about listed and conservation properties the AWEE Team have been working closely with the Historic Environment Team and are actively delivering measures to these types of properties through the LAD (Local Authority Delivery) and HUG (Home Upgrade Grant) schemes. This in despite of government funding streams often not offering the flexibility in finance levels in order to effectively treat these properties. The Council continues to raise these issues with the Department of Energy Security and Net Zero.

- A respondent made the following comment, I simply observe that it [Sustainable Affordable Warmth Strategy] is full of aspirational wording but very little in the way of how the needs will be actually achieved. What exactly is the Council going to do to improve the housing stock!!

The Council has committed to establishing and developing an Affordable Warmth and Energy Efficiency Team. The team is actively bidding for all types of external funding that is available to address fuel poverty and improve energy efficiency across its housing stock. Examples of funding include Home Upgrade Grants (HUG) Local Authority Delivery (LAD) and Social Housing Decarbonisation Fund (SHDF) which have helped to fund a whole range of measures outlined in the strategy to improve heating and insulation. All schemes are utilising a 'fabric first retrofit' approach. The Council's own ALMO STAR is undertaking a Passivhaus pilot. To underpin this work, the Council is working hard with partners to develop a supply chain, which is discussed in the Strategy.

- A view was raised that the Council's roadmap to reach 'Net Zero' by 2030 should match the Government's target of 2050. If not potentially miss out on funding streams. It is logical to assume that during the 27-year period to 2050 the Government will launch funding initiatives to help home owners, landlords and house builders to meet this ambitious target. The respondent stated that if all homes in Shropshire are net zero by 2030 it means investors, landlords and homeowners could miss out on 20 years plus of funding. In a sector that has seen more than double the inflation than the national average for a longer period of time, 2030 is an incredibly difficult target that will make investors think twice about future investment strategies. Also, need to factor in emerging technologies. We are finding that often "sustainable solutions" that we are piloting are causing higher fuel bills for tenants. This is partly down to lack of understanding/fear of new, but also because with each passing year technologies are becoming more efficient.

The Council's 'Sustainable Affordable Warmth Strategy' timescale has been reviewed and extended to 2030 in line with the Council's 'Net Zero' target. There will be annual reviews and updates as necessary to reflect the levels of government funding secured to improve the housing stock during this period. The Council remains committed to accessing a range of funding to improve the energy efficiency of housing stock across all tenures.

- A query was raised to say that 'District Heating Systems' are very expensive and require extensive new infrastructure work. Where used "successfully" in the UK has always been in city areas. Is Shropshire really suited to this solution?

District heating systems are just one of many options available and therefore listed as an example along with other technologies. The Council's Affordable Warmth & Energy Efficiency Team will continue to devise schemes working closely with our partners to utilise the most appropriate technologies at that time. Currently this is primarily standalone air source heat pumps. In addition, the current iterations of government funding streams don't support the installation of district heating systems. Should this change in the future the Council will of course consider this approach.

- A respondent said that it would be useful to understand who the ‘practitioners’ are who will be educated to give advice.
Shropshire Council has created an Affordable & Energy Efficiency Team and recruited a team of specialist professionals in this field. With the aim to maximise new funding opportunities and to deliver these complex programmes of work for the benefit of Shropshire residents and businesses.
- A respondent stated that the monitoring and inspection of private landlords is not sufficient. There will continue to be an “underclass” of housing provision. This is largely due to fear of reporting incidents from vulnerable tenants. A big issue in cities but will certainly be the case in the parts of Shropshire too.
Shropshire Council recognises that some tenants maybe reluctant to seek assistance. The Council’s specialist Housing Officers are experienced in dealing with such cases in a sensitive and supportive manner to secure the best outcome for the tenant. For example, the Council has recently been successful in accessing external funding to employ dedicated resource to work specifically on Minimum Energy Efficiency Standards (MEES) in the private rented sector.
- A respondent asked what does “Encourage housing developers to build to the ‘Future Homes and Building Standard’ prior to it becoming mandatory” look like? Could put investors and developers off if build costs become more prohibitive (already stretching viability).
As stated, it is to encourage investors and developers to build to a higher standard where possible.
- A respondent felt that the 2025 ban on gas boilers in new build homes needs to be the priority for now and the focus area. This is a huge issue that does not need to be further complicated by introducing additional targets that are ahead of national Government targets. The cost of install and running of non-gas options is still prohibitive. In addition, in Shropshire (and other LA areas) the infrastructure is not capable of carrying and powering the load required for all electric developments. An example was provided for a small community led scheme had a £300k additional cost to bolster the additional electric supply. That is a real unavoidable cost that will be replicated at many other new development locations across the County.
The Council has limited influence over national legislation.
- A respondent asked why do this now? The technology is still evolving. As the new build sector has to move to non-gas solutions post 2025 the investment in new and better technologies will undoubtedly increase, and as demand and use increases the cost will decrease. Pursuing this now will likely result in soon to be outdated technology being installed at a cost that is likely at or near its peak.
The Council would be at risk of failing to act if it insisted on waiting for the next best technological solution. The Council is taking full advantage of government funding streams and many of these prioritise certain technologies over others depending on national policy.

- A respondent said that national developers are still struggling to introduce “eco-homes” premiums on new build homes, hence why they are not doing it until they have to.

Eco-homes is an approach that the Council is keen to support through the Sustainable Affordable Warmth Strategy.

- A respondent stated that the opportunity to work with STAR Housing and Housing Association partners to develop a good practice guide for reducing carbon emissions in new build affordable housing is something that they totally agree with such a fabric first approach here. The respondent explained that they have been building all new homes with a building envelope (except windows) that meets Future Homes Standard U-values since April 2021. The respondent suggests the focus is here while the sustainable heating systems evolve and improve. Pilot projects are required now, but more with a tenant usability focus.

The Council would welcome the continued support of its Housing Association Partners in collaborative projects.

- A respondent suggested that there was a need to assess the impact of STAR Passivhaus pilot, which is still 30%+ more than building simply to regulations. The introduction of a monitoring and quality control system to establish the actual impact of retrofitting and new build technologies across all tenures is something that they as an organisation would want to be part of along with the Council and other Residential Providers on this crucial piece of work.

The Council and the Affordable Warmth & Energy Efficiency Team would welcome the support of partners in this research.

- A respondent made a general comment to say that they felt the document is trying to achieve both an environmental and a financial target which is commendable but difficult. It makes assumptions that changes to properties will lead to less fuel poverty where changes to properties at this point in time might actually be more expensive for the tenant. The respondent said that they were not sure that there shouldn't be two documents, one around financial inclusion and one about saving the planet, maybe as an Appendix A and B. There does appear to be a mismatch between the aspiration of being 'Zero Carbon' by 2030 and the Action Plans. But the Action Plans look more realistic.

The Council recognises that this is a complex area of work which cuts across both financial and environmental targets. All of our Sustainable Warmth Schemes are carefully constructed utilising best available advice and practice at the time. Government design many of the Sustainable Affordable Warmth Scheme, like many local authorities Shropshire Council share their knowledge and experience through 'lessons learned reviews' and respond to consultations etc., to help inform scheme design.