London Assembly Environment Committee

Submissions to Keeping out the chill: fixing London's cold, damp and mouldy homes investigation – from organisations

(27 February 2019)

From: [redacted]
Sent: 14 January 2019 17:41
To: [redacted]
Cc: [redacted]
Subject: Re: Cold and damp homes in London

[redacted]

Hi [redacted]

[redacted] my team is responsible for energy efficiency policy work so do feel free to come to me directly should you need anything in the future.

You're probably aware that we sit on the London Fuel Poverty Partnership, where issues around energy efficiency and advice are often discussed.

Re: the energy efficiency of consumers in homes in the private rented sector.
Last year we did a lot of work on the minimum energy efficiency standards for homes in the PRS - in late 2017 we published some economic modeling, and spent some time last year discussing the issue with the committee for fuel poverty, BEIS and other stakeholders, and responded to the Govt consultations etc. This blog gives a summary of this work, and links to the research: https://wearecitizensadvice.org.uk/how-the-government-can-help-renters-in-cold-homes-4653f3130237

The Government originally proposed a cap of £2.5K - after consultation this was improved to £3.5K: however, it remains our view that a cost cap of £5K would be most effective in really tackling household energy efficiency issues for consumers in the PRS. I think there is possibly a significant role for the GLA in coordinating the way London boroughs act on this.

Re: cold homes and ill health
This page on our website gives a useful overview of our work on cold homes and health. It focuses on the cold home toolkits for councils and health organisations that we developed jointly with Cornwall Council. But it also includes a report, and summary report, of our work in this area at the bottom of the web page: https://www.citizensadvice.org.uk/about-us/how-we-provide-advice/advice-partnerships/cold-homes-toolkit/.

We worked with BEIS, NEA and others on organising a conference in October last year on the topic of cold homes and ill health. Following the conference, BEIS has agreed to set up a fuel poverty and cold-related ill-health working group.

Re: your request for contacts and consumer journey for people who contact Citizens Advice in London

I am going to look into this - unfortunately, the attachment to your original email got lost in the chain - can you forward it to me please? Also can you let me know what timeframes you are working to?

Lastly, for info - there is a GLA funded Citizens Advice energy project (2 days a week) concentrating mainly on East London Boroughs. The person in this role delivers energy training to local Citizens Advice staff and volunteers across London also encouraging use of our comparison website to find the best energy deal for local clients. [redacted] works very closely with

SHINE and promote local schemes available to residents (i.e ECO Flex and Warmer Homes London).

best,

[redacted]

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Summary

This is L&Q's written evidence for the London Assembly Environment Committee investigation into cold and damp homes in London. It supplements the oral evidence given by Liz Blackwell at the scrutiny session on 6th December.

L&Q houses roughly 250,000 people in more than 92,00 homes, primarily across London and the South East. Our core tenure is social rented housing, genuinely affordable for people on lower incomes. L&Q is committed to tackling fuel poverty and making homes and communities places where our residents are proud to live.

Issues relating to cold and damp are of major concern to L&Q. We use significant resources dealing with reports of damp and associated mould in properties. From a customer experience perspective, we know that these types of issues often result in complaints or interaction with local councillors and MPs. By way of an indication of the scale of the issue, we have estimated that the capital investment required to bring our stock up to EPC level C or higher that are in fuel poverty across our stock to be in the region of £50million over the next ten years. This in itself will not address all instances of fuel poverty, cold and damp but does cover a lot of the more challenging circumstances. L&Q have estimated that under current fuel poverty guidelines and from our own assessments that an estimated 10,500 residents are in fuel poverty and are below an EPC band C.

As is well known, the issues around mould and damp are complex. They involve multiple interlocking issues of building design, energy efficiency, maintenance, lifestyle and poverty. We do not expect there to be any simple solutions but do think the time is right to have a better approach to improve the lives of residents – it is for this reason that we are investing £700,000 in 2019/20 to try out new approaches to damp and mould. In our response to the Government's Green Paper on social housing we have suggested that any successor to the Decent Homes Standard should have a greater focus on ventilation, damp and mould because it is such an important issue to residents.

There are a lot of initiatives relating to damp, cold, mould and energy efficiency but there is little systematic learning in bringing everything together and focussing on scalability of solutions. We are supportive of the GLA's plan to focus its funding efforts on understanding deep retrofit so that the challenging stock that exists in London is not put in the "too difficult" pile. However, in taking this approach there is a risk that the impact is restricted to the small number of properties where work is carried out. It is therefore critical that the GLA has a rounded and robust approach to distilling learning, disseminating this and starting to develop the trades and markets that will enable the role out of those measures that work well. Overall our key ask is that the GLA takes a leading role in the generation and promotion of good practices in managing damp and related issues in London the housing context.

L&Q will, of course, be willing to do its part by continue to share the learning it receives from its planned investments in damp and mould in 2019/20 and beyond.

In addition to the above we do comment that many organisations have benefited from the support of the current RE:Newprogramme and the GLA should consider how it can continue to provide ongoing support to enable landlords to continue to make progress now, with existing technologies and measures.

1. **What are the key issues or challenges to making London homes easier to heat and avoiding associated damp?**

L&Q's experience is that making homes easier to heat and avoiding associated damp and mould is a particularly challenging problem. As set out above, based on our experiences and information about our stock we have estimated that a £50 million capital investment over 10 years will be required to achieve SAP C in fuel poor homes. This figure would not cover homes where there are damp or ventilation problems that are not linked to energy efficiency measures so the full figure to tackle cold, damp and mould is significantly higher The most challenging stock type overall is Victorian properties although inadequate ventilation in newer properties also causes issues.

On a day-to-day level we know from analysis of customer contact that when an initial contact mentions the words damp or mould this is the most likely form of contact to ultimately lead to a complaint. When seeking to address complaints and service requests from customers our experience is that there are a range of complex interlocking issues that need to be untangled to identify root causes – including looking for leaks and other forms of water penetration, build design, maintenance issues and issues concerning how families live in their homes – which can often be driven by poverty. From the experience of dealing with these cases we know that it can often take several attempts to identify root causes and customers are often not happy with the outcomes. In turn these dissatisfied customers involve councillors and MPs. Quite aside from the capital investment required to address cold and damp homes landlords need to develop an appropriate range of responses to the ongoing issues.

Beyond the day-to-day level, we are an organisation that has been actively involved in energy efficiency projects for a number of years. Over this time we have experienced numerous challenges when attempting to carry out energy efficiency improvement works to our homes. These challenges include access issues, planning and a limited number of skilled contractors, as well as the high cost of many measures.

While the simpler energy efficiency measures are often easy to complete, there are many measures we would like to carry out to benefit our residents. We have learnt from our participation in TSB/Innovate UK-funded 'whole house retrofits' and have seen that long-term management costs can result in carrying out deep retrofit due to the complicated and technically risky nature of works. Previous deep retrofit schemes have had an insufficient focus on ventilation measures so damp and mould issues can still arise.

With regards to residents that are in experiencing cold as a result of fuel poverty, it can often be challenging to identify them without detailed one-on-one interviews. Clearer guidance is needed to establish an easier approach for housing associations and local government to identify customers in fuel poverty. Data is difficult to come by when assessing fuel poverty. At the moment, L&Q are identifying fuel poor homes through funding secured from the Warm Homes Fund, allowing us to assess 10,000 residents, however this is not a viable funding route at scale, and government support to simplify the process of identifying fuel poor homes is needed.

To practically reach the SAP C target by 2030/35 EPC legislation needs to be reviewed for it to be fit for purpose. It is not enough for EPCs to be used in isolation, instead it would be prudent to allow the actual occupancy to be included in any analysis, along with actual fuel bills. This would allow a more accurate report to be completed, helping residents understand their properties and their energy usage first hand – this "educational" approach would help with the broader issue of resident complaints about cold and damp.

One of the biggest practical challenges in making improvements is access to relevant skilled labour. Our experience is that whilst funding is available pools of skilled labour to carry our remedial measures develops but when funding programmes end the relevant labour force can rapidly dissipate meaning it becomes challenging for the measures to become self-sustaining. More generally there are skills shortages across maintenance and construction trades.

2. How, and how well, do the mayor's current policies and programmes help promote energy efficiency measures in London Homes

We have generally been supportive of the RE:New programme. L&Q is a large landlord with its own energy team, specialist procurement capability and capital resources for investment in energy efficiency measures. Even in this context we have found the support and guidance of the RE:NEW support team invaluable – providing expert guidance on new and developing practices. We can imagine that smaller landlords are even more dependent on this advice.

We understand the logic for focussing funding on some of the more challenging stock in London but in doing so the GLA should not lose the benefits of a scheme of broad based support for landlords to enable any learning that is gained from the projects to be turned into practical programmes at scale.

3. What new or different ideas and approaches could improve the mayor's policies? Are there examples from other parts of the country or the world?

As is implicit in the rest of our response, we do not believe that there will be any "magic bullets" to improve energy efficiency and damp and mould – particularly in the prevalent housing stock types in London.

In relation to damp and mould, in L&Q we are investing £700,000 in the 2019/20 financial year to try out a range of approaches with the ultimate aim of having a broad toolkit at our

disposal to use in a range of different property types and for residents in different circumstances.

In the initial phase of this work we will be selecting 20 properties to trial and evaluate some simpler solutions. Some of these are technological, some focussing on encouraging resident behaviour change and others trying to improve how we join up our internal services so that there are stronger lines of communication between our specialist Homesave officers and maintenance operatives to improve issue resolution. Throughout the remainder of the year we will try out and evaluate a range of other approaches with the aim of mainstreaming those that are effective into our service offer.

We know we are not alone in facing these problems in relation to damp and mould. However, in our preparatory work for our own programme have concluded there is a limited, up to date body of practical good practice that can be drawn on to tackle cold, damp and mould in a holistic manner across varied stock types. We have some of our own existing learnings from previous approaches and previous energy efficiency schemes and others do too. However, so far as we are aware, there isn't a systematic way of bringing this together. We would certainly intend to share any practical learning we derive from our investment next year but we do think that there could be potential for the GLA in taking a role here. With the coming into law of the "Homes, Fitness for Human Habitation Act" a range of landlords will be incentivised more than ever to adopt good practices.

Our work on damp and mould is separate to but complementary to our significant and long-standing programmes of work on energy efficiency across our stock.

Due to the scale of energy efficient measures required to reach the government's 2030/35 targets, L&Q are committed to minimising the impact on residents and are proposing, where possible, to install energy efficiency measures at the void stage, and when carrying out complimentary planned and cyclical works. In effect mainstreaming energy efficiency work into our ongoing maintenance programmes. This is not a model that has been widely used and again is something that we would hope to evaluate and share our learning, and to see case studies of where this has already been achieved elsewhere in the sector. When looking at the cross- London perspective it will be important to understand how much scope there is to bring about improvements when landlords have to carry out work in any event rather than seeing energy efficiency as being about "special projects and programmes".

Where residents are identified as being in fuel poverty, L&Q hope to deliver the proposed energy efficiency measures needed to make the property an EPC band C with the least disruption to residents. Under the WHF Home Save programme residents are also helped with behavioural change over a 12-month period to help them understand their energy usage and are referred to organisations such as Citizens Advice Bureau when extra support is identified. This rounded approach is needed in order to tackle cold and damp more generally.

L&Q have estimated that the capital investment needed to bring our properties up to EPC C, eradicate fuel poverty and mould and damp to be at least £50 million over the next 10 years. As external funding is not clear over the next 10 years L&Q are looking at

government to provide certainty and radically overhaul the energy funding to make it clearer and accessible at the point of delivery to help the residents that need it the most.

Looking at government funding programmes as a whole (not just within the GLA), we feel delivery would benefit greatly from government providing the following:

- Funding provided directly to the social housing sector, with which projects can be defined on the stock need and appropriate measures as part of planned programmes or a whole-house approach. This could be a tiered approach, including low, medium and high cost measures. Deliverables would be carbon and energy based instead of strictly time-limited. This will give a more realistic approach to cost and installation as deep retrofit projects can be costly and take a long time to do and negates the risk that funding expires before install is complete.
- An energy efficiency campaign to educate and encourage residents in the benefits of energy efficiency measures to increase access. To be delivered by co-branded government support to give residents assurance that if issues were to arise then the works are guaranteed and approved.
- Increasing funding substantially for fabric efficiency measures such as high cost solid wall insulation, double glazing including double glazed sash windows and secondary glazing to comply with planning is needed.
- Incentives for social and private sectors to achieve and surpass 2030/2035 SAP C leading to a bolder approach to energy efficiency legislation that tackles 3 key areas at once: EPC rating, fuel poverty and mould & damp.
- Acceleration of energy efficiency upgrades with a robust framework that can be accessed by housing associations and councils that shows best practice and the ability to use specialised suppliers quickly and efficiently.
- Clear and transparent mandatory regulations for the social and private sector.
- Planning departments working closely with housing associations and local councils to deliver the best possible result for residents and the surrounding communities, removing blockages and improving efficiency.
- Support to help accelerate the development of a skilled supply chains via graduate and apprenticeship schemes to ensure quality installation and maintenance of measures with higher technical risk, e.g. Heat Pumps, External Wall Insulation (EWI).
- In-built behavioural change support for all residents.

Looking specifically at the proposed new GLA retrofit programme, in planning its investment in the GLA should:-

- prioritise older more challenging housing stock that is prevalent in London.
- prioritise the use of technologies that are likely to be scalable – and consider the implications in terms of developing a skilled workforce to use the measures at scale.
- Have a specific focus on how energy efficiency measures and ventilation work together

- Ensure that the design of the deep retrofit interventions takes into account evidence of how people live in their homes (i.e. not assume optimum levels of occupation and behaviours).
- Ensures that there is significant programme of post occupancy evaluation after the retrofit to take into account overall impact on how people live their lives in the retrofitted home rather than a purely technical energy efficiency evaluation.

CONTACT FOR FURTHER INFORMATION:

[redacted]

Head of Policy and Insight

[redacted]

From: [redacted]
Sent: 09 January 2019 11:57
To: Environment Committee
Cc: [redacted]
Subject: Cold and damp homes in London

Dear Environment Committee

Please see the following comments below from the London Borough of Camden.

1. What are the key issues or challenges to making London homes easier to heat and avoiding associated damp?

New build homes do not pose a significant heating challenge but building standards driving air-tight construction can lead to condensation and damp risk in cases where mechanical ventilation systems are either poorly designed or maintained. This risk is considered to be greater in new build social housing and there is a need for high quality commissioning and maintenance of mechanical ventilation in social housing to prevent long term issues.

For pre-1919 solid wall homes, typical of many London streets, the heating challenge is more pronounced. Key challenges include:

* Planning restrictions making external solid wall insulation almost impossible to install in conservation areas
* Internal insulation posing significant risks to the building fabric through interstitial condensation
* The cost of insulating a typical pre-1919 home is around £15,000 making the payback uneconomic for owners and impossible to justify for landlords who do not pay energy bills
* Even if it were economic, the failure of the national Green Deal programme has undermined confidence in the “pay as you save” principle
* Where installed, both forms of insulation also have the potential to reduce internal ventilation rates with implications for internal air quality
* The rising cost of heat and the tendency of tenants to be on relatively uncompetitive landlord tariffs with tenancy agreement restrictions on switching supplier also poses a challenge
* There is a growing carbon driven policy shift towards the electrification of heat. The cost implications of this policy for vulnerable residents needs to be considered carefully.
* Evidence could be provided by the Green Deal Finance Company, the GLA’s own analysis, the Pay As You Save pilot led by DECC in 2010.

The Private Rented Sector is a specific area of concern whereby even when measures are identified, there is no incentive for landlords to complete the works (see proposal below)

2. How, and how well, do the Mayor’s current policies and programmes help promote energy efficiency measures in London homes?

* The policies are right but there is a need for a replacement domestic retrofit offer to RE:NEW and the Green Deal, underneath the Energy for Londoners badge. At the time of writing the only known offer/project is the planned Energy for Londoners white label energy

supply. There is no known offer/project from the Mayor which drives physical domestic energy efficiency retrofit beyond the national ECO programme which has limited uptake in the London region due to the high unit costs of retrofit relative to other parts of the UK.

3. What new or different ideas and approaches could improve the Mayor's policies? Are there examples from other parts of the country or the world?

Greater focus on the new Private Rented Sector MEES regulations to make landlords aware of their duty to improve the energy efficiency of low EPC rated properties provided the works do not cost more than £3,500. Promote existing grants to landlords that would enable the above improvements.

Consider the Energiesprong https://www.energiesprong.uk/ model as a method for improving stock where planning restrictions are not prohibitive of major retrofit.

At present the vast majority of fuel poverty spending is spent on income and price support schemes such as the Winter Fuel Payment, Cold Weather Payment, and Warm Homes Discount; which provide financial relief in the form of cash payments or energy bill rebates. They are very expensive policies (£2.6bn per annum collectively), and yet do next to nothing to address long term fuel poverty as their effect is purely temporary and not focussed on improving the energy efficiency of homes. Moreover, they are extremely poorly targeted at the fuel poor (for example the Winter Fuel Payment is available to all pensioner households – only 10% of whom are actually in fuel poverty). The Mayor could consider lobbying to direct this income based support in London towards physical energy efficiency improvements, for example by promoting the opt out arrangement for the winter fuel payment and seeking Govt permission to redirect consequent London savings to energy efficiency schemes in the capital (context here https://www.bbc.co.uk/news/uk-politics-31963099)

Regards

[redacted]

[redacted]
Strategic Lead - Sustainability, Air Quality & Energy
Regeneration and Planning
Supporting Communities
London Borough of Camden

Telephone: [redacted]
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[redacted]

Hackney

Contact
Philip Glanville
Mayor Of Hackney
London Borough of Hackney
Town Hall
Mare Street
London E8 1EA

[redacted]

Sent by email to:
environmentcommittee@london.gov.uk

14 January 2019

Tel: [redacted]

Dear Environment Committee Project Team,

Cold and damp homes in London

Thank you for seeking views on the key challenges that London faces in making homes easier to heat and avoiding damp and related issues.

With 10,000 households on our housing waiting list, 3,000 families in temporary accommodation, soaring private rents and the highest house price increases of any borough over the last 20 years, Hackney is facing an unprecedented housing crisis.
And while this is most commonly discussed in terms of the lack of genuinely affordable housing, the quality of the housing in Hackney has also suffered from a lack of investment in social housing by successive governments and an absence of proper regulation in our private rented sector.

Hackney is already leading the way in tackling issues such as cold and damp homes, fuel poverty and energy inefficiency. Our ambitious Council housebuilding programme is setting the standard for high-quality homes that are genuinely affordable people. Our investment in our existing housing stock is making the 32,000 homes we manage warmer, safer and more fuel efficient. And our Better Renting campaign is pushing for improved standards among the one third of homes in the borough that are rented privately.

In support of these objectives we have detailed strategies and fund/support? a wide range of organisations and services providing direct interventions, advice and support. Our pledge is to create a greener and environmentally sustainable borough for all of Hackney's residents and communities, and we would emphasise to the Environment Committee the need to campaign on and highlight the root causes of fuel poverty and energy inefficiency. At one level it simply doesn't matter how many items of legislation we have, how many projects we implement or how progressive our policies -unless and until the government begins to acknowledge and take seriously the root causes of fuel poverty listed

below, local authorities like Hackney will continue to face huge issues and increases in demand for our services:

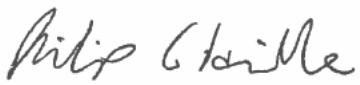
- The chronic lack of genuinely affordable, warm, energy efficient and good quality housing;
- Welfare reform;
- Wider structural issues arising from an energy industry which prioritises profit and shareholder value

I have attached many examples of how Hackney delivers services and advice to tackle the blight of fuel poverty. This evidence base provides a detailed experience which allows us to make some key points to the Environment Committee. These are:

- The need for significant increase in public investment in energy efficiency to keep our homes warm and dry. Energy company profits are at exceptionally high levels and are more than capable of funding increased public investment.
- The need for need more public and community ownership if we want to secure warm homes, lower energy bills and sustainable, cleaner energy sources. We have proposed our own, public municipal energy company with the aim to offer significantly cheaper, cleaner energy to residents and to generate income from which all the borough's residents will benefit. Initially the company will focus upon solar energy, utilising roof space owned by the council. The company will encourage democratic participation and accountability by having residents as board members. We would encourage more communities to follow our lead.
- The need to campaign against the inequalities and injustices caused by welfare reform and policies of minimal wages. Many people are left with 'heat or eat' choices – a position that is simply unacceptable.
- The need for structural reforms which can deliver a fairer energy pricing system. Pricing should change to a system which provides the initial units of energy used much cheaper, thereby decreasing the costs of meeting basic energy need.
- Finally, we support the Mayor of London's campaign to tackle the issues caused by pre-payment meters, particularly the problem of expensive tariffs on pre-payment meters. We would campaign for meter customers to be charged the cheapest tariffs.

Please do not hesitate to contact us should you require any further assistance.

Yours sincerely,



Philip Glanville
Mayor of Hackney

From: [redacted]
Sent: 14 January 2019 15:50
To: Environment Committee
Subject: Call for evidence: response from Lewisham Council

Dear Chair / Secretary
Please accept this email as Lewisham Council's response to The London Assembly Environment Committee's investigation into the problem of cold and damp homes in London. Given enough heat and ventilation, any building can be warm and free of condensation and its associated mould. We recognise that if you cannot afford to heat and ventilate your dwelling appropriately you will eventually be living with damp, cold or both. We know that the single largest cause of damp which affects most homes at some point in time is condensation.

1. What are the key issues or challenges to making London homes easier to heat and avoiding associated damp?

Over the years much of the research and advice which has been produced has complicated the issue for owner occupiers, housing providers and tenants alike. With a tendency for Housing providers and tenants to use the information to blame the other, additionally well-meaning but misguided landlords and tenants can and often do make matters worse. There needs to be a clear message of what is expected by each party and local and central government has its part to play.

Most of the initiatives from local or central government over the years which approached the issue from the perspective of what tenants should do to alleviate the problem have been largely ineffectual. They have either not reached their full potential or have not represented good value. The rented sector has in general lagged far behind the private ownership sector in both the sector's ability to afford the heating and ventilation necessary to keep the property warm and dry. This is often part of a wider circle which includes a toxic mix of high rents and low incomes combined with the lack of any incentive for private landlord to improve the energy efficiency of the buildings they control.

Recent research has suggested that the introduction of a requirement on private sector landlords to undertake yearly Gas inspections and the high cost of providing a gas supply to newly converted dwelling has had the unintended consequence of shifting a significate number of rented dwellings from gas to electric which in turn has led to an approximate doubling of heating cost for this group of tenants.

The challenge across the private rented sector is to break this cycle.

. Financial incentives (grants, loans) for home owners in fuel poverty or low income has been a useful lifeline even if it has only directly helped a relatively small group of people it still has merit.

. The availability of financial support for installing energy efficiency measures has been very variable, and this has limited delivery in a number of ways. The Government's Committee on Fuel Poverty estimates that an additional £2.8bn of Treasury Funded schemes are needed to meet UK's targets for combating fuel poverty

The main source of national funding tends to be through obligations on energy suppliers. This funding is regressive in nature with the cost disproportionally impacting on the lowest income households. The obligations are also poorly targeted and administratively costly. London as a region has not received the share of funding it should, although Londoners still pay an equal share of the cost. Over the course of several energy supplier obligations London comes 6 out of 9 regions in terms of spend through the obligation, but London is 2nd out of 9 regions in terms of the numbers of households in fuel poverty (see 2017 Sub regional fuel poverty data (2016 Data); 2017 Household Energy Efficiency National Statistics).

The identification of homes and/or individuals that qualify for funding is a particular issue, with support for this particularly poorly funded. The stop-start nature and partial approach of most

funding programmes tends to mean that the same household or property often has to be identified multiple times.
That said there are two schemes which have great potential to change the lives of tenants and Home owners. The Energy Performance certificate (EPC) has provide a framework to identify poorly insulated dwellings and a method of how they can be improved. The introduction of a minimum EPC band E or above rating for rented dwelling is a big step forward and further improvements to EPC rating could be though enforcement and or financial incentives.
The average annual energy bills by EPC band in 2014 were as follows: A/B £750, C £1060, D £1330, E £1710, F £ 2180, G £2860.
Lewisham inspects all empty homes undertaking any remedial work before re-letting. As part of this process homes are examined for damp, mould and condensation. If it is agreed that the home is suffering from damp, mould and or condensation the home is treated. This involves changes to the surface temperature by isolating the cold and create a new and warmer surface in order to maintain the heat and prevent condensation and mould growth. This is done by fixing a thermal foam and foil backed plaster board to the walls, to which will both isolate the cold and create a new surface temperature.

The foil acts as a vapour and cold barrier, assist in isolating the cold and retain the generated heat. The thermal material is a dense air tight material, which also plays a major part in the insulation which is closely compacted and enables the thermal resistance to be increased. This effectively resist the cold and effectively retain the heat. The plaster board also acts as insulation but at the same time created the perfect surface for the skim and decor to be applied. Air vent to be installed to allow ventilation and the space to breath. This programme of works also includes the removal of the skirting board, coving, the removal of the radiator and pipe work, skimming and reinstatement of all.
The cost of these works are between £110 - £120 per square metre with the average cost being between£2,500 - £3,000 per home.
2. How, and how well, do the Mayor's current policies and programmes help promote energy efficiency measures in London homes?

The Mayor of London's current policies are helping to address these issues through additional resource that is allowing more expensive and whole house approaches to be undertaken.

However this still appears to be working on a year to year basis. Without the security of longer term approaches to funding it is difficult to build up and maintain the outreach networks and supply chains that are needed to address the problem. There is concern that the Mayor's £10m investment on energy in the London Environment Strategy Energy has no minimum commitment for spend specifically on fuel poverty. There is also some confusion about the Energy for Londoners brand and whether the motivation for a London energy supply offer will unnecessarily use up resources without offering much by way of additional benefits that cannot be found elsewhere.

The GLA has been positive in reinforcing the central role that local authorities can have in coordinating action at a local level through the advice and referral networks. It is important that in addition to the public sector, the resource represented by community organisations can be enabled to add value to delivery on the ground. Local authorities can help join this activity up to avoid locally competing and confusing offers on advice. Given the ongoing pressures on the public sector the capacity of local authorities to play this vital role is at risk and there are now many councils where there is no dedicated officer working on domestic energy and fuel poverty. The GLA should continue to work with the sector to encourage and support capacity and avoid the risk of relying too heavily on one (or two) centre(s) of good practice that could itself be at risk if local priorities change or key staff are lost.
Lewisham welcomes the Mayor's investigation and would be keen to become more involved from offering further support to the committee through to being a test authority for any initiatives

that emerge through this process.
Kind regards,
[redacted] (on behalf of Lewisham Council)

[redacted]
Housing Policy and Partnerships Manager | Lewisham Council
t: [redacted]
[redacted]

London Assembly Environment Committee call for evidence: Cold and damp homes in London

Response from the National Landlords Association

January 2019

About the National Landlords Association

1. The National Landlords Association (NLA) is the UK's leading organisation for private-residential landlords, with 40,000 landlord members, ranging from full-time landlords with large property portfolios to those with just a single letting. NLA membership helps landlords make a success of their lettings business by providing a wide range of information, advice and services. The NLA campaigns for the legitimate interests of landlords by seeking to influence decision-makers at all levels of government and by making landlords' collective voice heard in the media. It seeks to raise standards in the private-rented sector while aiming to ensure that landlords are aware of their statutory rights and responsibilities.

2. If you have any questions about this submission, please contact [redacted], Policy and Public Affairs Manager, at policy@landlords.org.uk.

Summary

3. The key challenges in addressing cold and damp homes include the cost and effectiveness of heating the home, ventilation, and the behaviour of the occupant.

4. Energy Performance Certificates (EPC) provide ratings to identify the potential energy efficiency of a home. While they can offer a useful indication of energy costs, this depends on the actions of the occupant to make use of energy efficient options, as well as the core price of energy itself.

5. Our response will consider the position of private residential landlords, and their role in providing suitable homes for tenants.

HHSRS

6. The Housing Health and Safety Rating System (HHSRS) assesses hazards including damp and mould growth, and excess cold.

7. When assessing an excess cold hazard, paragraph 2.26 of the HHSRS Operating Guidance (Appendix D), states: 'The assessment should take account of the adequacy of the heating, insulation and ventilation. This may involve assessing the dwelling energy rating (using SAP) and any other factors which might affect the indoor temperature, such as dampness, or disrepair to the structure or to the space or water heating system.'

8. The Mayor has identified that lack of enforcement by local authorities has meant that criminal landlords are able to continue to let out homes which do not meet the standards required. The recent Fitness for Human Habitation Act will enable tenants to bring claims against landlords who fail to meet their obligations under HHSRS. We have consistently called for local authorities to put more resource and political commitment behind enforcement. With the enactment of the minimum energy efficiency standards (MEES), this provides an additional opportunity to improve standards in the private rented sector (PRS).

9. However, it will only be truly effective if the enforcement is there to back it up. While the majority of landlords will comply with the regulations, criminal landlords and unscrupulous letting agents, who often let to the most vulnerable tenants, will continue to act outside the law.

Energy efficiency

10. The UK Government has introduced MEES for all PRS properties to meet an EPC rating of E by 2020. Our Q1 2018 members survey found that 64% of landlords in London had no properties with an EPC rating of E, F or G and therefore would not be affected by the changes.[1] Our survey also found 84% of London landlords were aware of the requirement to meet a minimum rating of E, with 81% prepared to carry out works on a rental property to meet the requirements. This comprises 43% who would choose to carry out works to maximise the long-term value of their property and 36% looking for the minimum cost to comply with the regulations. Of those who would carry out works, 70% would look to their savings to fund this.

11. The UK Government has introduced a cost-cap for landlords in meeting the requirements at £3,500. The Government estimates that the average cost of improving an F or G rated property to an E would be £1,200. The Government has a further aim of properties meeting a minimum C rating by 2035, with private rented properties to meet the standard by 2030 – pointing to the continuing demand on landlords to improve the energy efficiency of their properties beyond 2020.

12. For landlords, the incentive to improve their property differs. For those letting single tenancies, the benefit of any energy savings accrues to the tenant, who is responsible for paying the utility bills. For landlords of houses in multiple occupation (HMOs) which are let as individual rooms, they are often liable for the energy bills, and therefore they may have an interest in ensuring the property is more energy efficient.

13. It is likely that landlords will seek to recoup the cost of any improvements to the property over time through increased rents, although this may be offset against reduced energy bills for the tenant.

14. However, our research suggests that tenants do not consider the energy efficiency of a property as a priority when choosing where to rent. Our survey of private tenants in June 2017 asked: 'Did you consider the energy efficiency of your home when deciding to live there?'.

15. The majority (64.2%) responded no – either it was not at all important (22.1%) or there were more important factors (42.1%). A further 6.3% could not recall whether or not they did, suggesting it was not a key factor in their decision making. Only 7.0% said it was an important factor in deciding where to live.

16. It should also be noted that the property's EPC rating is only an indication; if the tenant uses the property in a way which does not maximise energy efficiency, their fuel bills may still be high. For

[1] Survey of NLA members; 225 members with rental properties in London.

example, tenants may open windows rather than utilising ventilation options, or may not know how to use energy efficient measures they are unfamiliar with, such as heat pumps.

Behavioural change

17. Condensation can be a common issue, particularly in winter if properties are not well ventilated. Tenant behaviour can often contribute to this – for example by drying clothes inside, on radiators and/or without ventilation. Tenants may also not use extractor fans in bathrooms and kitchens, or fail to reduce moisture build-up for example by putting lids on saucepans when cooking or by opening windows.

18. In the winter, with windows often closed, this can mean the build up of condensation, made worse if the property is cold. We hear anecdotally from landlords that tenants choose not to use mechanical ventilation even when installed, with reasons varying from concerns about energy costs, to disliking the noise associated with them. Educating tenants on the wider benefits of ventilating their homes, and energy efficiency ways to do so, would help ensure that they are making best use of the options available to them.

19. Tenants may also choose to minimise energy costs, for example by air drying clothes even if a tumble drier is available, or by reducing the amount of time that the heating is on in the property. For the latter, the installation of condensing boilers can help to reduce energy costs and also meet much of the requirement to meet an EPC rating of E. However, there can be conflicts between reducing energy costs and meeting carbon emission targets, with gas being the cheapest energy but one with a large carbon footprint.

20. Where a tenant isn't keeping a home warm, it increases the likelihood of condensation and dampness and the associated health implications of this. Tenants in fuel poverty need support to be able to meet the cost of their energy needs, and while a more energy efficient property can help support this, this is not sufficient.

Potential further action

21. We have advocated to the Treasury the benefit of reintroducing a tax allowance for energy efficiency improvements, such as the Landlord's Energy Saving Allowance (LESA). Allowing all landlords to take advantage of LESA could see tenants across the whole sector benefiting from warmer homes now, instead of waiting five or more years for further regulations.

22. In the absence of any such incentives from the Government, it would be beneficial for the Mayor to consider what he could offer to private landlords to exceed the minimum requirements set out. This could include grants, and there are good examples of grants being offered by local authorities in London. For example, Camden Council's Landlord Grant scheme assists private landlords with up to £1500 per 1 bedroom or bedsit let, increasing to up to £15,000 per building, for energy efficiency measures to bring properties up to C, B or A rating. They also have a Green Camden helpline to provide advice to residents on energy saving, grants and discounts, as well as greener behaviour.

23. Similarly, a helpline has been established by Home Energy Scotland where independent advice can be sought. We would also support a repository of best practice that can be accessed by landlords, tenants and builders, identifying suitable works to building types.

24. Additionally, as outlined above, any further support the Mayor can provide to local authorities to enforce existing legislation will benefit tenants and compliant landlords by removing criminal landlords from the market.

Optivo submission to London Assembly Call for Evidence on Cold and Damp Homes

About Optivo

With 44,000 homes across London, the Midlands and the South East, Optivo is one of the largest housing associations in the UK. We provide housing for a broad cross-section of households, from low-income residents in general needs accommodation, to shared owners, students and key workers. Through our supported, sheltered and extra care schemes we also provide housing and support to some of the most vulnerable people in society. Optivo is a member of the G15 – the group representing the largest housing associations in London – and is one of the largest housing associations to attain SHIFT Gold accreditation marking excellent performance across a wide range of sustainability criteria.

Questions

1. ***What are the key issues or challenges to making London homes easier to heat and avoiding associated damp? You may wish to consider:***

a. *Price of work to improve or correct cold and associated damp*

Optivo has just embarked upon a twelve-year retrofitting programme to improve the energy efficiency of our poorest performing homes. Targeted at homes scoring below SAP 69 (EPC Band C), the programme represents a significant investment and is intended to ensure Optivo meets Government's target for all social housing to reach EPC Band C by 2030. Projects performed by CAN and SHINE suggest the average cost of retrofitting to this standard to be from £3,000 to £4,000 per home. This assumes energy efficiency measures include the likes of loft and cavity wall insulation, insulated doors, new windows and new heating systems.

We are aware, though, that costs could be significantly higher for our London stock due to the large number of homes in our ownership that are of solid wall construction. We estimate we have almost 6,000 homes with solid walls in Greater London, representing just under a third of our total stock in the capital. Many of these are located in Conservation Areas, which adds additional complexity in terms of the

requirement for planning consent before any works affecting the external appearance of buildings (for example, doors, windows and external wall insulation).

Below we have summarised some of the main issues and costs we expect to encounter when improving the thermal efficiency of these harder to treat homes:

i. Solid wall insulation

External Wall Insulation (EWI): this involves applying an outer-layer of thermally efficient board or coating to the existing exterior wall. External wall insulation can be expensive (at around £13,000 for an average-sized property according to the Energy Savings Trust) and often requires planning consent for which the default position of some local authorities seems to be to reject applications rather than consider them on merit. Optivo has tried and failed to gain planning permission for EWI on a number of occasions despite its potential to refresh the appearance of older homes. Some local authorities will only allow EWI to be installed at the rear of a building for fear of its effect on the visual amenity of an area. Post-Grenfell there is also a more general resistance to installing EWI from some London boroughs. We appreciate responsibility for planning decisions rests with the boroughs, but it would be good from our point of view to have some consistency and a more objective appraisal of the use of EWI.

Internal Wall Insulation (IWI): this involves lining the internal walls with insulation to improve thermal efficiency. Installation of internal wall insulation is more disruptive, causing greater disruption to residents whilst works are underway. It is expensive to install at around £7,400 per property according to the Energy Savings Trust, but the truer end-to-end cost is probably much higher when the additional costs associated with replacing skirting boards, rails, mouldings and electricity points are considered. In some cases IWI may also necessitate kitchen and bathroom replacement outside of planned improvement programmes, which leads to much more significant costs, albeit with obvious benefits to residents once the work is complete. For homes requiring more substantial works, the installation of IWI may require residents to be temporarily re-housed, which brings with it extra administration and re-settling expenses on top of those already outlined. Optivo is intending to bid for ECO Innovation Funding to trial new, less intrusive IWI technologies which work by applying a thinner highly-efficient thermal layer and ‘aerogel’. Costs are high, but could be offset against future savings associated with reduced call-outs and retrofit works.

For either type of solid wall insulation (EWI or IWI), the resulting annual energy saving for a detached property amounts to £415; £245 for a semi-detached property and £155 terraced house. Payback periods are therefore quite considerable. However, as a housing association invested in the long-term good of our residents and homes we can view these upgrades as long-term investments.

ii. Windows and doors

Windows can be upgraded to double- or triple-glazed glass with thermally-efficient frames, but planning consent has a long-lead in time and authorities differ on which materials they deem suitable. Windows meeting the requirements of planning

regulations are expensive. There is an opportunity to improve ventilation through the introduction of trickle vents in window frames as a standard specification. Outside London, the cost of a whole house upgrade of windows including front and back doors is typically around £4,200, but costs can be considerably higher in the capital, especially in Conservation Areas. The SAP uplift on windows and doors is quite small in comparison to the cost of the investment.

iii. Behaviour change

Optivo also works with residents to change behaviours associated with temperature and damp. In November 2018 we were awarded best 'Resident Engagement Project on Sustainable Living' by SHIFT, recognising the work of our energy advisors who visit residents in their own home with the aim of reducing their energy bills. Optivo offers a winter energy advice service to all residents as well as targeted energy advice visits delivered through projects in specific geographical areas. The benefits of this work on residents' finances are clear, but it is much harder to demonstrate whether these interventions offer a financial benefit to housing associations in the form of reduced rent arrears or maintenance costs, for example.

b. Identification of homes most in need of work

We are one of many housing associations using Parity Projects' **Carbon Reduction Options for Housing Managers (CROHM)** software to identify over-heating and hard-to-heat properties. We have found the software especially useful in providing the big picture needed for strategic decisions as well as the detail needed to plan and deliver individual projects. One especially useful feature is the ability to calculate the outline costs of specific measures required to upgrade properties to SAP 69 (EPC Band C).

Optivo has also begun installing Switchee **smart thermostats** in some of our London homes to identify properties with high humidity or low temperatures. These are quite expensive to fit and have not proved universally popular with residents, some of whom have raised particular concerns about the devices' ability to learn occupancy patterns in an effort to optimise heating schedules. As a landlord the devices offer obvious benefits in terms of reducing cold and damp and their ability to diagnose boiler faults before they result in breakdowns. But many residents have declined to give their consent for devices to be fitted given reservations over the sensitivity and security of occupation data.

c. Availability of support (financial or otherwise) for installing energy-efficiency measures

As mentioned above, the costs of improving the energy efficiency of older properties can be high, especially when meeting Conservation Area requirements. Additional top-up funding recognising the extra costs incurred when retrofitting such homes would enable us to expand and accelerate our energy efficiency programmes.

Optivo is currently in preliminary discussions with the GLA over how we might use the Mayor's Energy Efficiency Fund (MEEF) to draw down funds as required at a fixed low-interest rate to fund new or retrofit projects. However, we are aware some

funding including MEEF is partly funded by the EU and as such vulnerable to the nature of the UK's exit from the European Union. Our understanding is projects which have already secured EU funding will have that funding guaranteed until the project end date. As the leave date approaches, however, Government and the GLA will need to review the availability of support to make sure funding is adequate, especially given the Mayor's ambitions for London to be a zero-carbon city by 2050. One area of opportunity is in streamlining application processes. Our experience of EU-linked funding has been one of time-consuming, bureaucratic application processes, whereas those drawing solely upon domestic funds (for example, the Warm Homes Fund) have been much more straightforward. Our hope is Government and the GLA can continue this simplicity in any future funding programmes.

d. Quality of work to improve energy efficiency and reduce or avoid associated damp

Our primary concern is the availability of experienced contractors able to service and maintain new renewable installations. As a housing association, the maintenance of renewable technologies is largely unchartered territory and we have some concerns about whether our existing arrangements are sufficiently robust. For example, we do not currently have service and maintenance contracts for a large proportion of solar photovoltaic panels installed on our new and existing homes. Our ground and air source heat pumps are theoretically covered under our existing heating service contracts, but we have some concerns as to whether the existing contractors are adequately trained to service and quality assure renewable heating installations. We're seeking to plug this gap by tendering a new renewables service contract in spring 2019. We believe housing associations and others would benefit if the GLA were to establish some kind of protocol describing best-practice in servicing renewable heating installations and realistic assumptions about the likes of pay-back periods.

2. How, and how well, do the Mayor's current policies and programmes help promote energy efficiency measures in London homes? You may wish to consider:

a. To what extent the right homes are being reached and the number reached

b. The benefits of the work done, such as warmer or drier homes, reduced energy bills

We are currently working on a new monitoring framework to capture exactly this sort of information, bringing together intelligence from customer feedback surveys, calls and complaints. Findings from our IFORE project (see question three below) suggested residents' energy bills remained relatively constant as measures to improve thermal efficiency were counteracted by increased energy use brought about by residents buying and using new electrical appliances.

c. Any problems or unwanted effects of the work done, such as reduced ventilation or induced damp

In our experience, poor installation can cause damp issues. Insulation of walls and roofs can occasionally lead to cold breaks, which negate the benefits of the work. This is usually down to faulty work by the contractor.

d. The programme costs and spending

3. What new or different ideas and approaches could improve the Mayor's policies? Are there examples from other parts of the country or the world?

We have a history of working on projects involving partners in other EU countries. Probably the highest profile is IFORE a highly acclaimed Anglo-French retrofit project also involving the French housing association Pas-de-Calais Habitat, the University of Brighton and Universitie d'Artois. Elsewhere in the EU, the use of renewables, communal heating and high heat electric systems is more common than in the UK and there may be lessons to be learnt to unlock their potential here.

CALL FOR EVIDENCE

Cold and damp homes in London

1. What are the key issues or challenges to making London homes easier to heat and avoiding associated damp? You may wish to consider:

- Price of work to improve or correct cold and associated damp
- Identification of homes most in need of work
- Availability of support (financial or otherwise) for installing energy-efficiency measure
- Quality of work to improve energy efficiency and reduce or avoid associated damp

If you could provide or point to specific evidence or evaluations, that would be very helpful. Views and information about issues and challenges varying across London, or in specific parts of London or for specific groups of Londoners, are welcomed.

Peabody Response:

We welcome the opportunity to provide evidence on this issue. Peabody has over 150 years of history, experience and expertise in housing. We provide homes and services to more than 111,000 residents and 8,000 care and support customers. Our mission is to help people make the most of their lives by providing good quality homes, working with communities and promoting wellbeing. Ensuring that our residents live in comfort in their homes free from condensation, damp and mould is a large part of how we can achieve our mission.

Condensation, Damp and Mould (CDM) is a growing problem for our residents, leading to customer dissatisfaction and a rise in ongoing costs to deal with this problem. In 2018 Peabody spent £920,552.52 to remediate problems with CDM on 4,558 properties, with an additional £2,280,576.65 spent between 2016-2018 on our Thamesmead CDM project (see further details below).

The main barriers that we have encountered to ensuring homes are kept warm and free of CDM are an internal lack of technical knowledge and resource time to:

- identify which homes have the highest risk of CDM;
- identify and obtain funding for long-term projects (such as ECO3 funding); and
- identify effective technologies.

Thamesmead CDM Project

Peabody has been running an innovative, evidence-based approach to treating Condensation, Damp and Mould in Thamesmead in south-east London. The works were carried out between October 2016 and November 2018, with ongoing evaluation visits until November 2019.

Thamesmead homes include hard to treat homes. Most blocks have reinforced concrete floors and flat roofs supported on columns and cross-walls. The towers and some lower blocks are clad with pre-cast reinforced concrete panels. Some blocks have brick cladding. Windows and external doors were originally metal or timber framed and single glazed, but in the medium and low-rise blocks most windows have been replaced with PVCu-framed double-glazed units. Insulation is poor, consistent with standards at the time of construction; little or no insulation has been added.

The project allowed interventions to be targeted according to the CDM risk to a home. By using tailored insight and data to identify at risk properties, Peabody developed a programme to tackle the issue proactively. The successful approach included 1) fitting smart, innovative technologies which

require little intervention from the resident, 2) providing an anti-mould paint in each room (rather than a simple anti-mould wash) affected by CDM and 3) providing tailored behaviour change advice, undertaking energy comparison checks and providing information on energy and water grants.

The key objective of this project was to reduce CDM, ensuring the most efficient use of moisture management, heating systems and understanding of energy bills, which could reduce fuel poverty, whilst also improving residents' satisfaction. Damp management is a key driver of dissatisfaction, Table 5 in Appendix 1 shows the number of CDM-related complaints received by Peabody in relation to Thamesmead homes for the period 2015-2018. The cost of legal disrepair cases for Peabody was £644,416.85 between January 2018 to December 2018, a high proportion of these costs being due to CDM problems.

Two energy advice visits will be undertaken; the first after works have been completed. The second will be one year after works have been completed to assess whether the problems with CDM have reoccurred, and analyse the efficiency of the package of interventions for each risk level. During these visits referrals are made to other services and departments for additional support for residents, which is a key part of the Fuel Poverty Action Plan for London. No insulation works were provided during this project due to budget restrictions.

Identification of homes to be retrofitted

In order to identify the homes most in need of work, Peabody's housing stock database was referred to. The data was used for an assessment of the risk of properties suffering from condensation damp and mould. The information available included condition data, occupancy data, Housing Health and Safety Rating System (HHSRS) assessments and SAP energy rating assessments and some EPCs. More information on how homes were risk assessed can be found on page 2 of Appendix 1.

Three levels of intervention were identified based on the risk assessments and survey data:

- For low-risk homes (< 2.5 Score): energy advice, which is delivered by Peabody's in-house energy advice service; all households will receive this advice.
- For medium-risk homes (2.5 and 3.5 Score): anti-mould paint, energy advice, a smart heating controller, and where appropriate a new heating boiler.
- For high-risk homes (> 3.5 Score): anti-mould paint, energy advice, a smart heating controller and a new centralised mechanical extract ventilation (cMEV) system and where appropriate a new heating boiler.

Cost of Project

The costs of the works are:

For low-risk homes:

Energy advice (two visits)	£236.16
TOTAL including VAT	£236.16

For medium-risk homes:

Anti-mould paint (inc. contractor costs)	£895.69
Switchee (inc. contractor costs)	£887.63
Energy advice (two visits)	£236.16
TOTAL including VAT	**£2,019.48**

For high-risk homes (Full retrofit):

Anti-mould paint (inc. contractor costs)	£895.69
Aereco ventilation system (inc. Enabling works costs)*	£3,382.70
Switchee (inc. contractor costs)	£887.63
Energy advice (two visits)	£236.16
Other contractor costs (Non works costs)*	£946.08
TOTAL including VAT	**£6,348.26**

*See Table 3 and Table 4 of Appendix 1 for break down of these costs.

Outcomes

Individual	Broader society/community	Peabody
Financial impacts An average home saves £211 per year after energy advice visit. Health Impacts One resident stated "My children would wake up in the night, and cough a lot, since the works were completed, they no longer cough". According to the HACT health and wellbeing report, there is a £770 saving attributed to an individual for the rectification of CDM. Satisfaction 100% of homes have not had reoccurring problems with CDM. 100% satisfaction from energy advice visit.	Impact on NHS Physical and mental health savings. Prevention rather than reactive intervention. Societal impact Healthier and happier community.	Reduction in legal disrepair costs The number of legal disrepair cases due to CDM was £644,416.85 between January 2018 to December 2018. There has been a general increase in disrepair cases year on year, a high proportion of these legal disrepair costs are damp related. We anticipate that full CDM works would reduce legal disrepair costs and possibly arrear and void levels. Reduction in Complaints There was a 58% reduction in the number of CDM complaints in Thamesmead between from 2016 and 2017. This saves time for our contact centre and neighbourhood manager teams. Peabody Mission Our mission states that we will provide good quality homes and promote wellbeing. Also in our strategy is the ambition for healthy and happy communities, energy efficient homes and building relationships with NHS bodies and other care providers, recognising the importance of the relationship between housing and health.

The results speak for themselves, CDM was eradicated in 100% of the 277 homes involved, generating savings for both residents and Peabody. Each high CDM risk property has saved an average of £981 including £211 from the home energy advice visit and £770 for the rectification of CDM (according to the HACT health and wellbeing report). This is a highly replicable model for

housing maintenance teams that deal with hard to treat homes which are susceptible to damp and mould.

During the 2nd energy advice visit it was found that residents had made moisture management changes to their home following the initial visit. 75% of residents surveyed stated that they now leave doors closed during and immediately after bathing and cooking, and they dry clothes outdoors when possible. Surveyed residents report a 100% satisfaction rate for home energy advice visits.

A high proportion of residents who participated in feed-back visits found the new ventilation system to be the most beneficial part of the project, followed by the energy advice visits.

The project was funded as part of our improvement plan for Thamesmead to bring properties in that area up to the standard of other Peabody stock. This was a discretionary budget sourced through a mixture of capital investment and revenue funded activities and is therefore limited in its remit to the Thamesmead area. Peabody would need to gather significant additional funding to roll out this project to our other properties.

2. How, and how well, do the Mayor's current policies and programmes help promote energy efficiency measures in London homes? You may wish to consider:

- To what extent the right homes are being reached and the number reached
- The benefits of the work done, such as warmer or drier homes, reduced energy bills
- Any problems or unwanted effects of the work done, such as reduced ventilation or induced damp
- The programme costs and spending

Peabody response: The current Energy for Londoner's programme (EFL) would provide essential technical support in researching into the financing, designing and developing successful deep retrofit projects. Peabody have not yet been involved in this EFL programme but we identify the following as the most effective tools:

- use of a demand controlled ventilation system which requires no interaction from the resident;
- providing each home with a tailored 1-1 advice visit to explain about how any new technologies work and to give tailored behaviour change advice;
- undertake energy comparison checks and provide information on energy and water grants.

Peabody could benefit from technical assistance through the Energy for Londoner's funding for example to support us in achieving a deeper retrofit and enhancing carbon savings per household. Because of lack of staff resources Peabody could benefit from support in identifying and developing funding opportunities. Peabody currently has 54,432 houses from a total stock of 57,200 homes across London with an EPC rating of Band C and below.

- Band C -30,360 homes
- Band D- 22,116 homes
- Band E- 1,681 homes
- Band F- 252 homes
- Band G- 23 homes

Peabody is currently exploring the risk assessment of our entire stock to proactively support our residents, prioritising homes evaluated as higher risk. With a larger number of stock to work across, the cost per household for works will be reduced due to economies of scale. We would welcome being part of the Fuel Poverty Partnership.

Throughout Peabody's CDM project resident engagement rate was high. Out of the 277 homes which had works completed, the sustainability officer visited completed 202 homes, a 73% visit rate. This was done by contacting the residents by text initially (if possible), followed by telephone calls. Contact via text has proved a successful way of liaising with busy residents.

For further information please contact:

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Email – [redacted]