



Sustainable Housing Action Programme (SHAP)

Market Research Report

**The provision of advice to Housing Associations and
Private Developers, and the barriers to incorporating
sustainable energy measures in housing new build and
refurbishment**

**Produced by Hestia Services Ltd.
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Executive Summary

The Sustainable Housing Action Programme (SHAP) market research on which this report is based, had three main aims:

1. Highlight the existing levels of advice on sustainable energy being provided through Energy Saving Trust programmes to Housing Associations and Private Developers
2. Explore the barriers to incorporating sustainable energy measures in new dwellings
3. Research statutory duties that are in force, pending, or for which there is a body support, in order to identify pathways through which minimum sustainable energy standards could be enforced

The key findings are as follows:

1. An increasing number of housing associations in the West Midlands are joining regional or sub-regional partnerships, and accessing advice and support from local and national Energy Saving Trust programmes or those offered by related organisations and professionals bodies such as National Housing Federation and the Chartered Institute of Housing. The drive to be involved in sustainable energy projects is also demonstrated in the number and variety of best practice case studies contained in the SHAP case study and resource database, produced in November 2005.

However, private developers operating in the region do not yet appear to be seeking information or support on sustainable energy technologies, other than what is provided through professional bodies or trade associations. This may be due to lack of knowledge of the support available, or because Energy Saving Trust programmes have to date, focused support at local authority or housing association partners, with targets for improving the energy efficiency or thermal comfort of homes. However, with their being no legislative (or in many cases) local requirements for private developers to build new homes which incorporate sustainable energy measures above Building Regulation standard, there also exists no commercial advantage.

2. At present, new build developments by housing associations are the main route through which best practice in high specification energy efficiency and renewable energy technologies are being incorporated into regional new build housing projects. The drivers behind these best practice projects are often legislation and funding based, with the Decent Homes Standard providing a platform and capital funding requirements of the Housing Corporation providing an incentive.

However, there are also regional examples of housing associations integrating environmental sustainability into internal policy and housing management (South Shropshire HA, Black Country HA) above and beyond that required by government. Some have also founded exemplar sustainable energy projects. These exemplar projects and organisations are providing a regional platform from which others are keen to learn. However, improved access to funding, greater corporate commitment and education and training of staff and tenants will be essential to their more widespread implementation.

Whilst smaller in number, private developers are beginning to engage in the sustainable energy in new housing agenda. However their driving force is government or landowner minimum requirements. Private developers are driven by competition and end user demand, so until a significant commercial advantage in investing in sustainable energy technologies is demonstrated, end user demand for energy efficient homes increases, or minimum standards are raised, it will prove difficult to encourage more widespread private developer investment in such technologies.

3. Local authorities have a number of opportunities within their remit, through which sustainable energy standards can be required. Few local authorities in the UK, and not one in the West Midlands, are taking advantage of their planning policy power to require standards above Building Regulations in all new dwellings, although some others routes are being utilised. Routes available include:
 - Adopting a planning policy that requires minimum renewable energy on-site generation e.g. London Borough of Merton
 - Requiring a higher than minimum standard as part of the Section 106 Agreement with a developer
 - Requiring a higher than minimum requirement on the sale of all local authority owned land e.g. similar to the minimum EcoHomes rating required by English Partnerships
 - Requiring higher than minimum standards in all new housing Design Briefs

A number of central government and national movements are currently underway to raise the energy efficiency standards of new buildings, for example the Code for Sustainable Homes and Climate Change and Sustainable Energy Bill. This increasing pressure from National government provides a platform from which to demonstrate the importance of local and regional planning policy sustainable energy targets, and the expertise of exemplar councils should be used as a means to engage at the local authority level.

This research report will inform the planning of a workshop, which will take place February 2006, and focus on the routes through which sustainable energy best practice can be imposed through regional and local planning and development activities. It will also form part of the final report on the Sustainable Housing Action Programme, to be produced in March 2006.

Housing in the West Midlands

The West Midlands region is home to 5.3 million people. At its heart lies the conurbation (Birmingham, the Black Country, Solihull and Coventry) one of the most densely populated areas of the country with a population of 2.25 million. More than 80% of the land area of the West Midlands is rural or semi rural, with more than half of this containing isolated settlements. However, such settlements account for less than 3.5% of the region's housing stock. The vast majority (85%) of dwellings are located in urban areas with a population of more than 10,000 people.

The number of households in the region is expected to increase by about 250,000 between 2001-2021, with the majority of this growth taking place in the Central Housing Market Area (around 156,000 households) where almost two thirds of the region's population (64%) and households (63%) reside. In terms of Affordable Housing (based on Regional Spatial Strategy household forecasts), there is a need for nearly 78,000 affordable housing units 2001-2021 and almost 47,000 social housing units in the same period.

14,153 new homes in total were built in the West Midlands during 2004-2005 with the majority of these (12,997) being built by private enterprises and the remaining 1,156 by social landlords. This growth accounted for 8.4% of the total new housing in England and for 9.4% of private and 6.9% of social landlord new build¹. Between the years 2001-2002 and 2004-2005, 8181 affordable housing units have been built in the West Midlands through the Housing Corporation's Approved Development Programme. 2144 of these were built during 2004-2005.

In terms of housing refurbishment the total number of homes undergoing works is not so easily measured, however the West Midlands has two Housing Market Renewal Pathfinder areas within which major housing regeneration is taking place and a number of other area based Neighbourhood Renewal programmes underway. The two Pathfinder areas are RENEW North Staffordshire, which will involve the refurbishment or modernisation of 36,000 properties; and Urban Living in Birmingham and Sandwell whose long term plans include the refurbishment of over 15,000 homes and environmental works to a further 12,800. Area based programmes include the government's New Deal for Communities initiative in Wolverhampton, Sandwell, Coventry, Aston, Kings Norton and Walsall. Approximately 4,000 households are involved in each of these areas. The Decent Homes 2010 target for housing association and local authority managed dwellings and vulnerable households in the private sector is also driving significant investment in housing improvement works.

¹ ODPM Statistical Release, 16 February 2006.

1.

The existing levels of advice on sustainable energy being provided through Energy Saving Trust programmes to Housing Associations and Private Developers

Introduction

There is a significant amount of support available to housing associations and private developers through the various Energy Saving Trust programmes and also other national or regional organisations and agencies. This section of the market research investigated the extent to which housing associations and private developers access these services, and the level and scope of the support provided. The section is divided into three, based on whether support is provided through national organisations, regional or local agencies.

Regional support offered through national organisations, professional bodies and trade associations

The Energy Saving Trust offers housing professionals across the UK support through national programmes of work, in particular Practical Help, the Energy Efficiency Partnership for Homes and Best Practice in Housing Programmes.

Practical Help:

Practical Help is the Energy Saving Trust's one-stop shop information service for housing professionals in all matters relating to energy efficiency. Between April 2005 and January 2006, 16 West Midlands based housing associations have been in contact with Practical Help, and/or regularly have received their email bulletins or quarterly newsletters. These regional housing associations are listed below and the recipients have included surveyors, housing services managers, tenant representatives, business development managers, asset managers, housing consultants, improvement managers, sales managers and in three cases Directors:

Accord Housing Association Ltd
Ashram Group
Beechdale Community Housing Association
Black Country Housing and Community Services
Bromford Housing Group
Festival Housing Group
Heantun Housing Association Ltd
Heart of England Housing Group Ltd
Homezone Housing Ltd
Servite Houses
Sevenside Housing
The ExtraCare Charitable Trust
The Wrekin Housing Trust Ltd
Trent & Dove Housing Ltd
Walsall Housing Group
Whitefriars Housing Group

A number of West Midlands based commercial organisations have also contacted or received information from Practical Help since April 2005. These organisations are as follows:

Agility UK Limited
Arup Midlands Campus
Hearle & Brown, Ground Source Energy Agents
Opportunity Bewdley
Profit Focus
Solutions 4 Energy
Tribal Dundas Ltd

Energy Efficiency Partnership for Homes:

The Energy Efficiency Partnership for Homes brings together the key UK players involved in delivering energy efficiency improvements to the domestic housing sector. The Partnership contains a number of theme groups and interested individuals can join the Partnership and attend group meetings, as relevant. Theme groups often commission consultancy projects throughout the year in specific areas of interest. At present, the Partnership has no West Midlands based housing association or private developer members.

Energy Efficiency Best Practice in Housing Programme:

The Energy Efficiency Best Practice in Housing Programme provides impartial, authoritative information on energy efficient techniques and technologies. The Programme offers information and advice, develops best practice standards that integrate a package of measures for all aspects of new build and refurbishment and go beyond current building regulations, and provides technical guidance. Four West Midlands based housing associations have directly contacted the Best Practice Programme since April 2005. The names of these organisations are listed below. No private developers have contacted the Programme during the same period, however many resources are available online and may have been accessed by a wide range of individuals.

Housing associations who have directly contacted the Best Practice in Housing team:

A2 Housing Group
Staffordshire Housing Association
Waterloo Housing Association
The Wrekin Housing Trust Ltd

In the UK overall, Practical Help received requests from, or provided advice through events and newsletters, to 156 housing association members of staff between June and December 2005. 294 enquiries were received from local authorities and 276 from energy conservation authorities (those with energy efficiency responsibility for all tenures of housing within their area).

Housing Corporation:

The Housing Corporation is a non-departmental public body sponsored by the Office of the Deputy Prime Minister and responsible for funding and regulating the provision of affordable homes in England. The Housing Corporation provides capital funding for affordable housing developments and also funding for research and projects through the Innovation and Good Practice Programme.

National Innovation and Good Practice projects that can be accessed by regionally based housing professionals include Sustainable Homes and Green Streets, which are advice and information programmes; and the Environmental Matrix for Housing which helps assess environmental performance and plan activities to reduce the environmental impact of activities. The Warwickshire Social Housing Energy Forum (SHEF) was also originally set up with funding support from the Innovation and Good Practice Programme, and continues to provide locally based support to housing associations. Further information on this Forum can be found below.

BRE's Building Research Housing Group:

The Buildings Research Housing Group was formed in April 1992, and is a 'club' of over 100 of the most innovative and enterprising social housing providers, with collective responsibility for over one million homes. The Group is co-ordinated by a secretariat provided by BRE and approximately 90% of partners are registered members of the Housing Corporation. There is no West Midlands housing association or private developer regional representation within the Group.

Chartered Institute of Housing (CIH):

CIH is the professional organisation for people who work in housing. CIH's 19,000 members work predominantly in local authorities, housing associations and the private sector, and its key aims are to promote the art and science of housing, its standards and ideals, and the training and education of those engaged in the profession of housing practice. CIH has 11 regional branches offering opportunities for local members to network, learn about key national or regional consultations and gain access to information and expertise. The CIH West Midlands branch, based in Coventry, has over 1,500 members and amongst other activities, hosts an annual West Midlands conference.

Royal Institute of Building Architects (RIBA):

RIBA exists to advance architecture and promote excellence in the architectural profession through lectures, exhibitions and events, work in schools, community architecture projects and community architecture schemes. RIBA has a regional office based in the West Midlands, with a professional population of around 1,400 architects in 400 practices. The region is committed to delivering services that will enable members to work effectively as competent professionals, and promote architecture, good design, and public interest in the built environment.

Royal Town Planning Institute (RTPI):

RTPI is a membership organisation of mainly fully qualified professional planners. Almost two thirds are planning officers for local councils; others work for central government, property developers, or as consultants, teachers or researchers in universities. The RTPI has a West Midlands regional office with over 1,400 members across Hereford & Worcestershire, Shropshire, Staffordshire, Warwickshire and the former county of West Midlands.

Royal Institute of Chartered Surveyors (RICS):

RICS is the professional body for Chartered Surveyors and a source of property related knowledge, and independent, impartial advice to governments and global organisations. RICS has an extensive online database of member Chartered Surveyors. As of January 2006, there were 162 registered Surveyors in the West Midlands, based within a range of private and public sector organisations.

National Housing Federation:

The National Housing Federation is a membership funded organisation which represents over 1,400 independent, not-for-profit housing associations in England. NHF work with members to promote their values, successes and future role in housing, represent the strategic interests of the sector, and inform and support members to enable them to pursue innovation and excellence. The West Midlands is part of NHF's Central Region and has 130 housing association members. These members are listed in Appendix A.

Federation of Master Builders (FMB):

FMB is a trade association which aims to protect the interests of small and medium-sized building firms. It is the largest trade association in the UK building industry and has 11 regions and around 140 local branches, including one based in the Midlands region. The branch (covering the East and West Midlands regions) has 1350 members (predominantly those providing small scale house renovation and adaptation work) and holds meetings, conferences and safety and health awareness days.

Guild of Builders & Contractors:

The Guild of Builders & Contractors is a national membership body of around 3000 firms and individuals who are actively involved in the building industry. One of the Guilds key aims is to encourage the continual improvement of construction methods and standards. They circulate information to members on a wide range of subjects via regular bulletins and newsletters. Detailed membership figures for the West Midlands region were not available at time of research.

Home Builders Federation (HBF)

HBF is the principal trade organisation for private sector housebuilders, and voice of the home building industry in England and Wales. Member firms account for over 80% of all new homes built in England and Wales in any one year, and include companies of all sizes. The Federation has a Midlands branch based in Birmingham, representing regionally based house building organisations.

National House-Building Council (NHBC):

NHBC is the standard setting body, and leading warranty and insurance provider for new and newly converted homes in the UK. Its role is to work with the house-building and wider construction industry to provide risk management services that raise the standards of new homes; and provide consumer protection to new home buyers. NHBC also offer a comprehensive consultancy service on EcoHomes, BREEAM (Building Research Establishment Environmental Assessment Method), energy ratings and energy performance in buildings. There are approximately 19,000 house builders and developers on NHBC's Register, with 550 based in the West Midlands region.

Housing, Asset Management, Maintenance and Regeneration Group (HAMMER):

HAMMER is a UK wide forum dedicated to improving communication and knowledge on housing maintenance and asset management within social housing. Affiliated to the National Housing Federation, they also provide advice to the Federation on national issues related to specialist subjects within their field. There are HAMMAR partnerships across the country and 41 housing associations are members of the

West Midlands regional group. The regional Chair is Leon Storer, Asset Manager for Aspire Housing Association. West Midlands based members are as follows:

Accord Housing Association
Adullum Homes Housing Association
Anchor Trust
Ashram Housing Association
Aspire Housing Association
Beechdale Community Housing Association
Bentilee Community Housing
Black Country Housing Association
Bournville Property Care
Broaden Choices for Older People
Bromford Carinthia Housing Association
Caldmore Housing Association
Choices Housing Association
Dane Housing Association
Elgar Housing Association
English Churches Housing Association
Family Housing Association
Focus Housing Association
Gloucester Housing Association
Heantun Housing Association
Homezone
Jephson Homes Housing Association
Mercia Housing Group (Worcestershire Housing Association)
Mercian Housing Association
Midland Area Housing Association
Optima Community Association
Orbit Housing Association
Sanctuary Housing Association
South Shropshire Housing Association
South Staffordshire Housing Association
South Warwickshire Housing Association
Staffordshire Housing Association
The Beth Johnson Housing Association
The William Sutton Trust
The Wrekin Housing Trust
Touchstone Housing Association
Trident Housing Association
United Churches Housing Association
Waterloo Housing Association
West Mercia Housing Association
Wyre Forest Community Housing

Regional support offered through sub-regional or locally based organisations:

Energy Saving Trust:

The Energy Saving Trust operates a network of advice centres across England, Scotland, Wales and Northern Ireland. Their main function is to provide residents with free and expert impartial advice about saving energy in the home. Many centres work with local councils to set up energy efficiency schemes with energy suppliers,

and help develop networks with other local agencies e.g. health services, schools, installers etc.

A number of EEACs also have a dedicated team who provide strategic sustainable energy support to local authorities, housing association and private sector companies. These staff are separately funding through the Energy Saving Trust's Local Energy Support Programme.

There are four EEACs in the West Midlands region, who collectively cover the 34 local authority areas in the Government Office West Midlands region. The four EEACs are Central Midlands, Black Country (both managed by Hestia Services Ltd.), Shropshire Herefordshire & Stoke, and Warwickshire Worcestershire & Coventry (WEEAC). There are also two Local Energy Support teams within the region. One team covers the Central Midlands and Black Country EEAC areas, the other Warwickshire, Worcestershire and Coventry. There is no Local Energy Support coverage in the west of the region (Shropshire and Herefordshire) or north Staffordshire.

In addition to their roles as EEAC and Local Energy Support Programme managers, Hestia and the WEEAC also operate housing partnership forums for local authorities and housing associations in their areas. Hestia's Sustainable Housing Partnership (SHOPAR) also includes members from Shropshire, Herefordshire and North Staffordshire.

Sustainable Housing Partnership (SHOPAR):

SHOPAR is a local authority and housing association best practice forum which enables housing professionals to share, learn and develop best practice in energy efficiency and sustainability. There are two groups within SHOPAR; the private sector housing group is formed mainly of local authority HECA Officers and is chaired by Robin Dunlevy, Energy Efficiency Officer from Solihull Metropolitan Borough Council; the social housing group brings together organisations with housing management responsibility, both local authorities and housing associations, and is chaired by Tony Price, Strategy & Research Manager from South Staffordshire Housing Association. The partnership meets twice yearly as separate groups, and twice collectively to discuss issues of joint relevance. Topics covered to date include *Strategies for delivering Decent Homes, Tackling hard to heat properties* and *Forthcoming legislation* (including the European Energy Performance of Buildings Directive, Housing Health & Safety Rating System and Building Regulations Part L).

The following Housing Associations are members of SHOPAR, alongside 16 of the region's 34 local authorities:

Accord Housing Association Ltd
Ashram Housing Association Limited
Beechdale Community Housing Association
Family Housing Association (Birmingham) Ltd
Festival Housing Limited
Guinness Trust
Heantun Housing Association Ltd
Herefordshire Housing
Homezone Housing Ltd
Moorlands Housing
Nexus Housing (Midlands) Association Ltd

Potteries Housing
Servite Houses
South Cheshire Housing Society Ltd
South Shropshire Housing Association Ltd
South Staffordshire Housing Association Ltd
The Abbeyfield Solihull Society Ltd
The Beth Johnson Housing Association Ltd
Touchstone Housing Association
Trident Housing Association Limited
Walsall Housing Group
West Mercia Housing Group
William Sutton Trust
Woodlands Quaker Home
Wrekin Housing Trust

Working as a partnership, SHOPAR has successfully gained funding to develop and deliver a number of projects involving its housing association members. It has also enabled members to collectively voice their views on issues of joint relevance, for example a group response was submitted to the West Midlands Regional Assembly in 2004, on the Regional Housing Strategy.

Green Housing Toolkit:

In 2005, SHOPAR undertook a green housing project in partnership with South Staffordshire Housing Association. Funding from the Energy Saving Trust enabled SHOPAR to commission e2S environmental consultants to develop recommendations for the environmentally sustainable refurbishment of two South Staffordshire's properties, and also produce materials that could be used to inform and encourage sustainability best practice across all housing sectors. The Green Housing Toolkit is a free resource that provides technical advice to help housing associations or private developers build new homes or refurbish dwellings that are more energy efficient and have a lower environmental impact. The toolkit can be accessed online and over 150 technologies are presented in tabular format. Cost information, maintenance, and usability by residents presented as well as an assessment of both innovation and affordability in comparison to the standard technology. South Staffordshire are currently using the toolkit to assess aspects of their housing maintenance programme, and a training schedule to promote the Toolkit's use is currently being developed by Hestia.

Ashram Housing Association Affordable Warmth Strategy:

Following a risk-based assessment of its managed housing stock in 2004, Ashram requested support in developing an Affordable Warmth Strategy with the aim of providing warm and healthy homes to all tenants. The strategy is one of the first of its kind in the housing association sector, and was developed in partnership with a wide range of internal and external partners across the West Midlands. The strategy was launched in December 2005.

Housing Association Energy Strategies:

Awarded funding by the Energy Saving Trust in December 2005, this project will provide five West Midlands based housing associations with support to develop corporate energy strategies covering their managed stock, business premises, repairs, transport and the consumption of supplies and services. The project will review performance, draw upon best practice, and help construct a strategy and

action plan, including monitoring and evaluation mechanisms. It will also enable SHOPAR to organise training and introduce the Green Housing Toolkit to a wider audience, promoting its use in comparing traditional technologies to more environmentally sustainable counterparts.

Conserving Energy: A What, Which. How event for Social Housing Landlords:

In November 2004, SHOPAR and the Warwickshire & Worcestershire Social Housing Energy Forum (SHEF) hosted a regional event for housing associations. The aim of the event was to raise awareness of the energy and affordable warmth issues that affect housing associations, and offer delegates practical advice and information on how to tackle these issues. The day was attended by 16 different housing associations and resulted in new housing association members joining the SHOPAR and SHEF partnerships.

Warwickshire and Worcestershire Social Housing Energy Forum (SHEF):

The Warwickshire and Worcestershire Social Housing Energy Forum (SHEF) is a housing association best practice forum which enables housing professionals to share, learn and develop best practice in energy efficiency and sustainability. All SHEF members hold energy advice Service Level Agreements with the Warwickshire EEAC. They also host regular tenant days with residents of three housing association members: Festival Housing Group, Whitefriars Housing Group and Heart of England Housing Group. SHEF are also currently working with Heart of England Housing Group to develop an Affordable Warmth Strategy.

SHEF housing association members are as follows:

South Warwickshire Housing Association
Festival Housing Group
Sanctuary Housing
Bromsgrove District Housing Trust
Wyre Forest Community Housing
Hastoe Housing
Worcester Community Housing

Shropshire, Herefordshire and Stoke EEAC:

In addition to the support provided to local authorities in Shropshire, Herefordshire & Stoke, the EEAC is currently negotiating Service Level Agreements with housing associations in their area. The Agreements will include the provision of energy efficiency advice to tenants, information on grants and discount schemes, exhibition support, training, information packs and home visits. The following housing associations have expressed interest in these services:

Aspire Housing Ltd
Wrekin Housing Trust
Bournville Village Trust

An energy advice referral system is already in place between the EEAC and Bournville Village Trust's Home Maintenance Advice Team. Wrekin Housing Trust is currently developing an Affordable Warmth Strategy with support from the EEAC.

2.

Exploring the barriers to incorporating sustainable energy measures in new dwellings

Introduction

The SHAP national and regional best practice case study report highlighted a wide range of best practice housing projects across England and the West Midlands. However, whilst many housing associations are building or refurbishing to increasing environmental standards, few private housing developers are yet to go beyond the minimum required by current Building Regulations.

The best practice seminar on 25th October was attended by a number of different housing organisations involved (or with an interest) in sustainable energy housing schemes, and highlighted the drivers behind existing projects. Discussions at the event also identified some of the barriers to implementing sustainable energy best practice. The second part of this market research aimed to build upon these discussions, and identify in greater depth, barriers to the integration of sustainable energy technologies in new build developments.

Methodology

Telephone based market research was carried out with 18 West Midlands based housing associations and 5 private developers. The market research questions considered what sustainable energy technologies (if any) the organisation had considered or implemented, and any barriers they faced (and may still face) in implementing such measures.

The research was carried out between November 2005 and January 2006. Results are presented below, and an overview of the difference in responses supplied by housing associations and private developers provided as appropriate.

Results

- *The implementation of sustainable energy measures by housing associations and private developers*

Housing associations are required by Government to ensure that all dwellings they own and manage meet the Decent Homes Standard by 2010. The Standard has four criteria for housing improvement, one of which requires a minimum level of thermal comfort. Implementing the Decent Homes Standard is of key priority to all housing associations at present, and significant resources are being channelled into its delivery.

Whilst the Decent Homes Standard requires only a minimum level of insulation and heating to be provided, many housing associations are choosing to integrate more significant, if only traditional, energy efficiency measures. These include condensing boilers (which since 1 April 2005 have become a mandatory requirement), energy efficient double glazing, loft insulation (above the levels required by Decent Homes), cavity wall insulation, low energy light bulbs and in one case external wall insulation (although the work was subsequently halted due to cost)

11 of the 18 housing associations have actively considered renewable or low carbon technologies to date, although few measures have been implemented. One quarter of housing associations interviewed either already achieve a minimum EcoHomes rating in all new developments, or ensure that high SAP ratings are met through the design and integration of energy efficiency measures.

Private developers are currently only integrating standard energy efficiency measures to Building Regulation requirements. Two developers actively incorporate higher environmental standards in their new build developments even where not required. However, for the remaining of those interviewed, higher sustainable energy specifications (under EcoHomes) are only considered when required by e.g. Housing Corporation's capital funding programme or landowners such as English Partnerships.

Three of the five private developer interviewed had independently considered sustainable energy technologies. Redrow Homes and Cornhill Estates have subsequently implemented a range of measures irrespective of funding, land owner or planning requirements. Green roofing was considered by Crosby Homes, but not integrated due to cost to the company.

The range of renewable, low carbon or environmentally sustainable technologies being considered by housing association and/or private developers for new build developments include:

- Small scale / domestic wind turbines
- Solar hot water panels
- Air source heat pumps
- Solar photovoltaic panels
- Mini combined heat and power
- Ground source heat pumps,
- Renewably sourced window frames,
- Ventilation systems including extractor fans
- Heat recovery systems
- Waterless urinals

Whilst only a small proportion of the organisations involved in the research are actually implementing these measures, many interviewees agreed that there is growing interest in environmental alternatives to traditional methods from both front line staff and management.

For housing associations who have not to date considered sustainable energy technologies in their new build developments, the reason stated were related to either the profile of the housing stock managed by the organisation, or the cost effectiveness of sustainable energy measures.

- *The barriers to implementation*

Interviewees identified a number of barriers to implementing sustainable energy technologies, particularly low or zero carbon technologies. The barriers most frequently raised include cost and lack of senior management support, however a number of other issues also hamper the implementation of more sustainable energy schemes:

- Cost
- Pay back periods of some renewable technologies
- Technologies are not seen to be proven
- Fear of vandalism or damage to 'different' installations
- Lack of, or difficult to access funding (central Government and Housing Corporation)
- Lack of senior management support
- Lack of recognition of the increasing importance of sustainable energy from both government and management staff
- Tenants unfamiliarity or awareness of the benefits of such technologies
- Age of tenants (particularly if elderly)
- Technical expertise within the organisation
- The need to modernise peoples thinking (internal staff and tenants)
- Installer expertise
- Decent Homes taking priority
- Fears over the maintenance and repair of systems
- Awareness of the architects designing new developments
- The cost-energy efficiency balance
- The supply chain for alternative technologies (size of industry)

Cost:

Whilst the Housing Corporation requires an EcoHomes 'Good' rating to be achieved by all developments utilising its capital funding programme (rising to 'Very good' on 1 April 2006), the routes through which funding can be levered in for renewable energy measures are not so well known by housing associations, or available for use in new build projects.

Central government does offer capital grants for renewable energy technologies, soon to be relaunched as the Low Carbon Buildings Programme from 1 April 2006; the Energy Saving Trust also offers funding through a number of programmes, and also energy suppliers provide funding for energy efficiency (and some other measures such as fuel switching) through the Energy Efficiency Commitment. However, housing associations and private developers find such grants difficult to access and investigate due to resource and knowledge restraints.

An additional difficulty with Housing Associations accessing the former Clear Skies, now Low Carbon Buildings Programme, grants is that the Housing Corporation treats these (and other Energy Saving Trust, Department for Trade and Industry or ODPM funding) as 'other public subsidy' and every pound awarded through such schemes results in one pound less from the Association's Housing Corporation Affordable Housing Programme grant.

Also, the Energy Efficiency Commitment (whilst being utilised by many housing associations) is focused on funding traditional energy efficiency measures which provide the most cost effective carbon savings (generally loft and cavity wall insulation). As new build developments must meet Building Regulation standards and traditional cost effective measures are integrated within these, the EEC funding stream is often not applicable.

Lack of senior management support:

Projects across the West Midlands that have successfully integrated sustainable energy technologies or used alternative techniques (a selection of which were highlighted at the best practice seminar on 25th October 2005) all had support or a driving force from senior management. Therefore, lack of senior management support for the implementation of sustainable energy measures was seen as a major barrier.

A number of barriers from senior management against the use of sustainable energy technologies were discussed. They include (in no particular order): cost effectiveness against traditional technologies, lack of understanding and attitudes towards alternative methods, the desire to deliver more for money, concerns over repairs and maintenance, health and safety, and the lengthy payback periods (particularly for renewable technologies).

Whilst many interviewees said they were keen to develop best practice case studies and implement alternative sustainable energy technologies into new build projects, the lack of funding support and hence need for the housing association to invest, meant that projects or proposals were often unable to progress. Also, a number of individuals felt that within senior management, there existed generational barriers against using alternative construction or new technologies over those more familiar, and that individuals would first need to modernise their thinking.

Lack of understanding and awareness:

Tenants

The level of awareness of the benefits of energy efficiency across tenants is low, and often their understanding of renewable energy technologies is even more so. This can often result in opposition to implementing new technologies, as tenants do not always realise the benefits of reduced energy use. A number of housing associations also mentioned that they are concerned that tenants will be unable to use new technologies effectively (particularly elderly residents) or maintain systems on a day to day basis.

Staff

In addition to the barriers placed by senior management, a number of interviewees mentioned that there is also a low level of awareness of the benefits of sustainable energy within their organisations as a whole. Technologies are not understood, their applicability to various housing types is in many cases not known, and the time required to investigate alternative technologies is not available to staff. This lack of understanding often results in resistance from a number of departments involved in the new build development process; including maintenance, surveyor and design teams.

Private developers identified a number of similar barriers to the implementation of sustainable energy in their new build developments. Cost, internal awareness of alternative technologies and also the awareness of the end user were all highlighted. This latter issue was however more related to the features that sell the property and customers not being interested in (or aware of the benefits of) energy efficiency measures. Other barriers identified include:

- Lack of legislative drivers
- The need for integration from the early design stage

- Undeveloped supply chains for sustainable energy technologies (size of industry)
- Variety of suppliers involved and possible delays to completion targets
- Internal infrastructure (communication across departments)
- Inadequate internal 'paper' systems (for evidence to meet EcoHomes)

Lack of legislative drivers:

Unless involved in Housing Corporation funded schemes or building on land owned by English Partnerships, which require a minimum EcoHomes standard to be met, private developers are not required to meet energy performance standards above those required by Building Regulations. Operating in a competitive sector, private developers stated that unless they see a marketable advantage to implementing sustainable energy measures, their housing design will only aim to meet the minimum.

However, all developers stated that if they were required by legislation or local policy to meet a minimum energy performance standard, it would be integrated into design and cost plans and subsequently met.

Awareness and understanding:

Internal organisational understanding of sustainable energy technologies, coupled with the lack of customer awareness or demand for energy efficient homes and lack of regulatory incentive, means that developers do not see sustainable energy as commercially advantageous or necessary to their ability to sell homes.

Planning from the design stage:

The private developers with experience in projects requiring higher environmental standards (EcoHomes) stressed that in order to successfully integrate new technologies or techniques, proposals must be integrated from the early design stages and all partners consulted. One interviewee involved in a Housing Corporation affordable housing scheme mentioned that the late notice they received about minimum requirements resulted in only marginal improvements that would enable them to meet the required rating, being made. Greater improvements would have been made had the requirements or aspirations been made clear from the outset.

Production and supply chains:

For one of the private developers interviewed and involved in sustainable energy developments, a major barrier to the ease of implementing measures has been in the size of the sustainable energy technology market. Technologies are manufactured and installed by different companies requiring coordination between many contractors, and because the manufacturing and installer base is small, development completion can be delayed. This issue was also raised by several housing associations involved in sustainable energy projects, and identified as a possible future barrier to the further implementation of sustainable energy technologies.

- *Overcoming barriers*

In overcoming barriers, training, education, and better information on sustainable energy technologies was recognised as a high priority and to be delivered to all – from senior management to sub contractors, sales teams to residents and customers. A number of promotional and awareness raising methods were suggested:

Tenant awareness booklets – providing information about alternative technologies, to help reduce opposition and promote the direct benefits to tenants of implementing new measures in housing renewal or new build developments.

Greater promotion of best practice case studies – offering real life examples of successful schemes, lessons learned and benefits gained. Best practice examples are particularly useful in engaging with senior management and making recommendations as to why standard practice should be changed. Cases studies would also help engage with tenants and demonstrate the real benefit of the technologies e.g. savings made on fuel bills. The promotion of case studies providing evidence on the applicability of sustainable energy technologies to new build or refurbishment design would help overcome skepticism of those involved in delivering housing projects.

Sustainable energy seminars – these would enable individual organisations to share knowledge, best practice, and experience; and discuss ideas of how sustainable energy measures could be more widely implemented.

Feasibility Studies – investigating the feasibility and potential applicability of sustainable energy technologies in new build developments. Information on cost, supply and installation, maintenance and the benefits to the organisation and tenant should all be explored.

Advice to suppliers, installers and surveyors about alternative technologies in installation and use – education of those involved in the physical implementation of measures. Sustainable energy technologies may require different installation procedures/handling from the traditional technologies or products and training should be provided for front line delivery staff or sub-contractors.

Education and awareness raising across all departments and senior management – a number of interviewees mentioned that there is often a 'fear of anything unknown' and organisational thinking may need 'modernising'. Providing guidance on the suitability of alternative technologies for retrofit and new build was identified as particularly important. Overcoming the barriers created by lack of awareness or understanding will help pave the way towards implementing new technologies.

Literature on funding and how these may be accessed – a guide to the funding available for new build projects and the regional organisations that provide application support e.g. EEACs, regional Forums. This would reduce confusion and the time required by non-energy experts to understand, apply and gain funding to implement measures.

Maintenance, repairs and health and safety training on any installed technologies – to enable internal or sub contracted support teams to understand the systems and effectively respond to problems to resident queries. Also, information and advice to tenants on the day to day maintenance and effective use of any 'new' technologies.

In addition to education and awareness, the following actions were suggested as a means to drive sustainable energy best practice into the mainstream of new build housing projects:

- Careful planning from the design stage and consultation with all key partners
- Information on the market advantage of sustainable energy in new build (particularly where it results better, quicker or more economical building)
- Consistency of planning requirements across local authority areas (e.g. section 106)
- A step change in required standards to integrate sustainable energy into new build and develop the technology supply markets
- Setting local planning policy targets for sustainable energy in new build
- Engagement with regeneration partnerships to ensure sustainable energy is part of the planning and development process
- Regional lobbying to integrate renewable energy technologies into the future Decent Homes Standard (post 2010)
- Appointing a champion to drive sustainable energy up the new build regional agenda and act as a source of advice and support
- Engaging and training architects involved in the design of new homes
- Standardising the methodology used by housing associations reporting annual carbon savings per pound spent, to Housing Corporation

3.

Statutory duties that are in force, pending, or for which there is a body support, in order to identify pathways through which minimum sustainable energy standards could be enforced

Duties and requirements already in force

All new housing developments or refurbishment schemes (private or social housing sector)

Source	Requirement
EU Performance of Buildings Directive	Will require UK-wide introduction of the following: single national energy calculation methodology (SAP), Energy Performance Certificates, minimum energy performance standards, regular inspection system for boilers over 20kW, inspection of air-conditioning systems over 12kW. The Housing Act and Building Regulations help translate the EU Directive into national law.
Building Regulations Part L1A and L1B	To come into force 6 April 2006 and together with the update in 2002, aim to improve energy performance standards by 40 percent. New Part L contains 2 sections and also separate standards for new build and works to existing buildings.– Part L1 is for dwellings. L1A – new dwellings: improved external lighting standards, minimum boiler efficiency rating (SEDBUK) A or B, renewable and low carbon technologies encouraged, limitation of excessive solar gains, improved airtightness L1B – existing dwellings: Energy Performance Certificate to be updated on improvement works, minimum boiler SEDBUK rating A or B, performance standards of extensions increased, improved lighting standards In addition, Gas condensing boiler to be installed from 1 April 2005, Oil-fired condensing boilers from 1 April 2007. The Regulations will be updated again in 2010.
Housing Act 2004	All new and existing homes marketed for sale or let will be required to have a Home Information Pack (HIP) from April 2007. The HIP will include a Home Condition Report and Energy Performance Certificate detailing the

	energy efficiency (SAP) of the property and estimated cost of heating and hot water per year. Also suggested cost-effective energy efficiency improvements.
English Partnerships	Require minimum of EcoHomes very good to excellent by developments on their land.

Housing Associations only

Source	Requirement
The Decent Homes Standard – Thermal Comfort criteria	Following the 2000 Spending Review, ODPM introduced the Decent Homes Standard - a key aim that it would like all social housing to meet by 2010. The Standard includes four criteria, one of which is focused on thermal comfort in the home. The Housing Corporation has adopted this Standard as a key part of its management of social housing.
National Affordable Housing Programme 2006-2008 – Scheme Development Standards	From 1 April 2006, all new developments receiving capital funding to meet minimum EcoHomes 'very good' rating.
Housing Corporation Regeneration and Housing Market Renewal Policy	States that the Corporation will only fund projects which are based on sustainable development principles and which promote sustainability.
Housing Corporation Sustainable Development Strategy (quotes from website)	States that associations should develop their own sustainable development strategies and action plans to ensure coherent and systematic approaches are adopted. Also, that as the main providers of new social housing it is important that issues such as climate change as addressed.
Housing Corporation Regulatory Code, August 2005.	Code 3.4 Housing associations must develop and manage good-quality homes that seek to meet people's needs and preferences now and in the future 3.4a Permanent housing is sustainable, demonstrated by a commitment to effective protection of the environment and prudent use of natural resources.

Local Authorities only

Source	Requirement
Home Energy Conservation Act (HECA)	All Energy Conservation Authorities (LAs with responsibility for housing) to prepare and publish a report setting out energy conservation measures that the authority

	<p>considers practicable and cost-effective, and which should result in a significant improvement in the energy efficiency of residential accommodation in its area. Target is 30% improvement in energy efficiency across all tenures, over 10-15 years from an April 1996 baseline.</p>
<p>PSA Target 7: Decent Homes in the private sector – Thermal Comfort criteria</p>	<p>Following the 2002 Spending Review, ODPM extended their Decent Homes target to increase the proportion of vulnerable private sector homes meeting the Standard to 70% within the same timescale. Local authorities should aim to incorporate this target within their Housing Strategies and through the Regulatory Reform Order 2002, have been provided with more flexibility on how they can provide financial assistance to the private sector, particularly promoting equity release and loan schemes.</p>
<p>Housing Act 2004 – Housing Health & Safety Rating System (HHSRS)</p>	<p>Replaces the current Fitness Standard and will need to be met by all housing stock from 1 April 2006. Hazards within a property are assessed on an individual basis. Of the 29 hazards that have been identified, <i>Excess heat/cold</i> and <i>Damp/mould growth</i> are the two that have particular links with energy efficiency.</p>
<p><i>Planning Policy Statement 22</i></p>	<p>PPS 22 is the national Planning Policy Statement on renewable energy which takes forward the Government's commitment to renewable energy set out in the Energy White Paper at a planning policy level. PPS22 sets the bedrock of planning policy against which other tiers of plans must conform. Some of the key principles include:</p> <ul style="list-style-type: none"> - Regional/local plans that 'promote and encourage' rather than restrict the development of renewable energy resources - Ensure environmental and economic benefits are of material consideration when assessing planning proposals - Promote knowledge of and greater acceptance of prospective renewable energy developments

Private Developers only

As in Table 1, but will also be required to meet Housing Corporation Scheme Development Standards (EcoHomes 'very good') if involved in Affordable Housing

projects with capital funding from the Corporation, and meet individual landowner/planning policy requirements e.g. English Partnerships EcoHomes standards when building on certain areas of land.

Proposed legislation

The Code for Sustainable Homes:

The Code for Sustainable Homes is a voluntary initiative, by Government and Industry, to actively promote the transformation of the building industry towards more sustainable practices. It builds on the approach of the EcoHomes standard and proposes to set star ratings based on the energy efficiency and environmental sustainability of new homes - where there is a relevant building regulation, then the minimum Code standard will at least equal or exceed it. Minimum standards will be set for each essential element and all of these that must be achieved if a home is to meet Code standards. The Code, as currently proposed, will have six essential elements:

- Energy efficiency in the fabric of the building and appliances in the building
- Water efficiency, for example, fitting dual flush toilets
- Surface water management, for example sustainable drainage
- Site waste management
- Household waste management
- Use of materials

A consultation on the proposed Code is currently underway. Responses are requested by 6 March 2006.

Climate Change and Sustainable Energy Bill:

This Bill would require the Government to produce a fiscal and economic strategy to assist with microgeneration and energy efficiency in order to combat climate change and alleviate fuel poverty. It would introduce both UK and local targets for the take-up of microgeneration, and set up a scheme requiring electricity suppliers to buy electricity produced by domestic customers by microgeneration.

An amendment to the Bill, suggesting minimum national targets for renewable energy within new buildings and dwellings was introduced early February 2006 but defeated by vote. However, this has led to ODPM calling for an "urgent review" of PPS22.

Climate Change (Contraction and Convergence) Bill:

This Bill would make provision for the adoption of a policy of combating climate change in accordance with the principles of contraction and convergence. Contraction and Convergence is a framework devised by the Global Commons Institute (GCI) for tackling climate change. Contraction refers to the need to reduce greenhouse gas emissions to a sustainable level, and convergence to the idea that within the same timescale, emissions rights should be distributed on an equal per capita basis. The Bill received its first reading in the House of Commons on 23rd November 2005.

Potential avenues for imposing sustainable energy best practice

Planning and development policy, government or regionally funded housing programmes and fiscal incentives are all potential routes through which sustainable energy best practice could be implemented on a more widespread scale.

Planning and development policy

Local authorities have the power to require minimum energy efficiency or renewable energy standards from new dwellings built on land within their geographical boundary. This may be implemented through a number of planning and development routes including:

- A minimum renewable energy generation requirement on all new buildings
- A Section 106 Agreement
- Minimum requirements set as part of sale of land (e.g. local authority owned)
- Sustainable energy requirements built into regeneration/renewal partnership (for example, Urban Living) business plan
- Sustainable energy measures incorporated into Design Briefs for maintenance and new build within the area
- Education and consultation with tenants to get buy in and drive to implement sustainable energy measures

Section 106 Agreements:

Section 106 of the Town and Country Planning Act 1990 allows a Local Planning Authority (LPA) to enter into a legally-binding agreement or planning obligation, with a land developer over a related issue, often termed a Section 106 Agreement. They can act as a main instrument for placing restrictions on the developers, often requiring them to minimise the impact on the local community and to carry out tasks, which will provide community benefits.

For example, as part of its Unitary Development Plan, the London Borough of Merton introduced a renewable energy policy in 2003 that requires all new buildings over 1000 metre squared to incorporate renewable energy production equipment that will provide at least 10% of predicted energy use requirements. This policy has been instrumental to raising the profile and capacity of renewable energy use across the Borough and provides a platform from which other local authorities can learn.

Government and regional housing programmes:

Government housing and regeneration programmes provide a potential route through which higher minimum sustainable energy requirements could be implemented. These include the following types of programmes:

Council housing:

Through the 'stock option appraisal' process all local authorities retaining stock in their ownership are identifying routes to achieve the Decent Homes Standard by 2010. This involves three routes which release additional resources: stock transfer, arms length housing management and the Private Finance Initiative, together with a further route of continued stock retention in line with planned national resources which does not release additional resources. In total £63m is allocated in the region for 2006-08, with sums raised by transfer and PFI being additional.

Private Sector Housing:

The West Midland RHB is responsible for advising Government on the allocation of resources to meet the objectives of the Regional Housing Strategy, including meeting

the Decent Homes Standard. The allocations for 2006-08 totals £379m (compared to £359m in 2004-06). This will provide resources to assist local authorities to work towards the PSA 7 target in the private sector (£53m). In addition resources may be generated through loans and equity release products that attract private finance.

Housing Market Programmes:

The region has allocated £58m in 2006-08 towards housing market renewal and growth in the Major Urban Areas, coalfields and areas where there are particular fitness problems. This may include support for housing market renewal in the Black Country and Telford and housing market restructuring in the East Birmingham/North Solihull Corridor. Additionally national resources are being provided to support housing market renewal in North Staffordshire (RENEW) and North West Birmingham/Sandwell (Urban Living).

New Deal for Communities:

There are five NDC areas in the region consisting of 2 Round 1 areas: Greets Green (Sandwell) and Kings Norton (Birmingham) and 3 Round 2 areas: Aston (Birmingham), Wood End, Henley Green and Manor Farm (Coventry) and All Saints and Blakenhall (Wolverhampton). The partnerships established to deliver these programmes have national resources to support improvements the quality of life, including housing.

Local Area Agreements:

National resources are being allocated to support the development of these agreements that are designed to provide freedom and flexibility in the delivery of programmes. These provide scope to enhance energy efficiency measures. LAAs were first piloted in Coventry, Telford & Wrekin and Wolverhampton and will be rolled out to all Unitary Authorities, Metropolitan and County Councils by 2007. Local Public Service Agreements – additional national funding allocated to local authorities based on a set of targets negotiated with the Government Office for the Region. Resources include a reward element paid if agreed targets are achieved. LPSA funding can form part of LAAs.

Neighbourhood Renewal Fund:

Additional national funding allocated to those most deprived local authority areas in the region. Programmes funded under NRF often have elements linked to the quality of life, including energy efficiency measures. NRF resources can form part of LAAs.

National Affordable Housing Programme (NAHP)

The new Housing Corporation programme supporting Registered Social Landlords and developers. The RHB has allocated £198m for schemes in 2006-08 with the recipients to be announced shortly. New homes will be built to Eco Homes Very Good standard.

Existing RSL managed stock

There are no earmarked external resources specifically available to RSLs in order to improve their stock. The need for this spending is built into business plans and, in the case of stock transfer, reflected in the transfer value. RSLs with a particular predominance of older stock, such as acquired properties like pre-1919 terraced housing, face particular challenges. The Housing Corporation is expects the DHS to be reflected in Asset Management Plans to be funded within RSL Business Plans.

Fiscal incentives

Fiscal incentives at the householder level have been demonstrated as a key way in which private sector households can be encouraged to invest in energy efficiency measures.

Fenland District Council was first council in the UK to launch an initiative that provides local residents with an energy efficiency financial credit towards their Council Tax bill. 'Energy Tax Credits' provides three levels of Award - Gold (£100 credit), Silver (£50 credit) and Bronze (£25 credit) based on the measures installed in the home. Bronze and Silver require improvements to the fabric of the property, Gold asks for renewable energy measures to also be installed.

Braintree District Council has similarly linked Council Tax rebates to the installation of cavity wall insulation. This was provided via a promotional offer of £100 for the first 500 applicants to the councils BEAT the Cold insulation scheme.

Appendix A

NHF Members based within the West Midlands region, as of January 2005

Accord Housing Association
Adullam HA
Aldridge HA
Annabelle Lady Boughey & Mary Roddam Housing Trust
Ashram Housing Association
Aspire Housing Ltd
Balsall Heath Co-op Ltd
BCOP (Broadening Choices for Older People)
Beechdale Community HA Ltd
Bentilee Community Housing Ltd
Beth Johnson HA Ltd
Bethany Trust
Birmingham Association for Mental Health
Birmingham Civic HA Ltd
Birmingham Jewish HA Ltd
Black Country Housing & Community Services Group
Bloxwich Housing Trust Ltd
Blue Mountain HA Ltd
Bournville Tenants Ltd
Bournville Village Trust
Bournville Works HS Ltd
Bromford Carinthia HA Ltd
Bromford Charitable HA Ltd
Bromford Premier Housing Association Ltd
Bromsgrove District Housing Trust
Caldmore Area HA Ltd
Castle Vale Community HA Ltd
Central Walsall Housing Trust Limited
Chestnuts (Ross-on-Wye) HA Ltd
CHOICES Housing Association Ltd
Churches Housing Association of Dudley & District (CHADD)
Claverdon Benefice HA Ltd
Condover College Ltd
Coventry & Warwickshire YMCA
Coventry Cyrenians
Darlaston Housing Trust
Dorcas Housing + Community Support Association Ltd
Ebonita HA Ltd
Elgar Housing Association Ltd
Evesham and Pershore HA Ltd
Family HA (Birmingham) Ltd
FCH Housing & Care
Festival Housing Ltd
FHA General (Birmingham) Ltd
Five Counties HA Ltd
Focus Home Options Agency Ltd
Focus Housing Association Ltd
Forward HA Ltd

Fry Housing Trust
HAMAC HA Ltd
Harborne Parish Lands Charity
Harden HA (Midlands) Ltd
Heantun Care Housing Association Ltd
Heantun HA Ltd
Heart of England Housing Group Ltd
Herefordshire Housing Ltd
Herefordshire Old Peoples HS Ltd
Hibiscus Housing Association
HomeZone
Jephson HA Ltd
Jephson Homes HA Ltd
Keynotes Housing Group
Lench's Trust
Lower Milehouse Estate Limited
Lyng Community Association
Marches HA Ltd
Merican HA Ltd
Midland Area HA Ltd
Moorlands Housing
Moseley & District Churches HA Ltd
Nehemiah HA (Church of God Prophecy) Ltd
New Midland HA Ltd
New Outlook Housing Association Ltd
Nexus (Midlands) HA Ltd
Old Ben Homes HA
Optima Community Association
Orbit Housing Association
Orbit Housing Group Ltd
Potteries HA
Prime Focus Regeneration Group Ltd
Rayner House and Yew Trees Ltd
Redditch Friends HA Ltd
Redditch YMCA Ltd
Rivendell Lake Housing Association Ltd
Rooftop Homes Ltd
Rooftop Housing Group Ltd
Rotary Club of Dudley HA Ltd
Sahaara (Birmingham) Housing Association Limited
Sanctuary HA
Sevenside Housing
Sherbourne HA Ltd
Shropshire Association for Sheltered Housing Ltd
Shropshire Rural HA Ltd
Sir Josiah Mason's Trust
Small Heath Park H Co-op Ltd
Solihull Care HA Ltd
Soroptimist Housing (Rugby) Ltd
South Shropshire HA Ltd
South Staffordshire HA Ltd
South Warwickshire HA Ltd

Spa Housing Association
St Basil's
St John Kemble Hereford HA Ltd
St Peter's (Saltley) HA Ltd
Staffordshire HA Ltd
Stanhope court (Worcester) HA Ltd
Starley H Co-op Ltd
Stoke on Trent and North Staffordshire YMCA HA
Stoke-on-Trent HS Ltd
Tamworth Cornerstone HA Ltd
The Haven Wolverhampton
The Wrekin Housing Group Limited
The Wrekin Housing Trust
Touchstone HA Ltd
Trent & Dove Housing
Trident Charitable HA Ltd
Trident HA Ltd
United Churches (Birmingham) Ltd
Walsall Housing Trust Ltd
Warwickshire Rural HA Ltd
Waterloo Housing Association Ltd
WATMOS Community Homes
Wednesfield HA Ltd
West Mercia Housing Group Ltd
Whitefriars Homes North Ltd
Whitefriars Homes South Ltd
Whitefriars Services Ltd
Wilenhall Housing Trust Limited
Worcester Community Housing
Wyre Forest Community Housing Ltd