Places for People

ENVIRONMENTAL SUSTAINABILITY STRATEGY 2023

Environmental Sustainability Strategy 2023

1. EXECUTIVE SUMMARY

This paper sets out Places for People's approach to environmental sustainability, including the contribution we make to achieving the UK's 'Net zero carbon[1]' aims through the homes we develop, own and manage, and our implementation plan.

Places for People has made a good start on environmental sustainability, however, the aims are challenging and expectations are growing. Housing and energy infrastructure are intrinsically linked, and as we develop and refurbish our stock a key question is whether customers can afford to heat and power their homes. Sustainability is also an increasing focus for investors and decarbonisation is essential to ensure the long-term viability of our stock and its value. Therefore, now is the time to step up our approach and prepare for the future operating environment including through testing cutting edge approaches and financial models to deliver at scale. A gradual approach and new financial models will enable us to balance our economic and social priorities with delivering improved environmental sustainability outcomes and affordability for customers.

Our strategy is based on a hierarchy of three elements: legislation, ESG reporting requirements and our stretch targets.

We have worked with business areas to develop a performance framework (***Appendix A***) to deliver these, with targets grouped across five themes:

- **Reducing carbon emissions**
  Reduce Scope 1, 2 and 3 carbon emissions across the business.
- **Climate resilience**
  Adapt properties against the effects of acute and chronic climate events e.g., floods, temperature rises.
- **Ecology**
  Minimise biodiversity losses caused by building development, increase green space provision and reduce pollution.
- **Sustainable resource management**
  Promote procurement of sustainable and responsibly sourced resources and circular use by reducing consumption, increasing re-use and re-cycling of all resources, including construction materials, and reducing waste to landfill.
- **Customer and colleague engagement**
  Increase customer and colleague engagement in environmental sustainability.

Progress against our targets will be reported and considered at our Environmental Sustainability Management Group. The strategy and framework will be reviewed annually to ensure it is aligned to current legislation, government policies and the operating environment.

[1] 'Net zero carbon': When the amount of carbon emissions associated with the building's operational energy on an annual basis is zero or negative.
A net zero carbon building is highly energy efficient and powered from on-site and/or off-site renewable energy sources, with any remaining carbon balance offset'
Net-Zero-Carbon-Buildings-A-framework-definition.pdf (ukgbc.s3.eu-west-2.amazonaws.com)

Section 1

2. APPROACH

Background

2.1 The definition of environmental sustainability is broad, covering the conservation of natural resources and protection of global ecosystems. Many decisions that impact on this area are not felt immediately. Consequently, the US Environmental Protection Agency defines this as *'meeting today's needs without compromising the ability of future generations to meet their needs'*. Places for People has a solid record on environmental sustainability, with early investment such as improving the energy efficiency of 108 homes in Padiham, near Burnley and, more recently, securing significant funds for the retrofit of over 200 homes in Bedford and Hounslow through the Government's Social Housing Decarbonisation Fund (SHDF).

2.2 Vision: Balancing economic, environmental, and social needs

Our Group strategy sets out our aspiration to: *Balance economic, environmental, and social needs to improve the lives of current and future generations.* As well as environmental sustainability we also have to consider the need to deliver more homes for people who need them and look at the broader social value we can achieve. While delivering environmental sustainability can increase costs to business there are benefits, the most significant being improving energy efficiency for customers. Therefore, a focus for us will be on delivering environmental outcomes that align with delivering our economic and social outcomes.

2.3 The rationale for a step change in our focus on environmental sustainability

There is a clear moral case to act to reduce the extent of climate change and to protect society and our customers from the impacts. The UN Sustainable Development Goals (UNSDGs) provide a framework to achieve a better and more sustainable future globally. Our environmental sustainability strategy is aligned to the relevant UNSDG's (***Appendix B***).

2.4 Environmental, Social and Governance (ESG)

We are now seeing increased external scrutiny from regulators, investors, and other stakeholders on the delivery of environmental sustainability. Environmental, Social and Governance (ESG) is the term used to identify matters that are traditionally associated with sustainability or corporate responsibility — focussing on an organisation's impact on the environment and wider society. ESG has the capacity to reflect the positive impact of an organisation and can also have a potentially material financial impact on an organisations' short-term and long-term value.

Organisations looking to benefit from their ESG credentials are required to disclose key information including their principles and approach, policies and performance against specific indicators including emissions, resource usage and supply chain risks. A systematic approach to environmental sustainability for the business and, in practice, delivery against these will support a strong performance against the E in ESG.

[2] Carbon emissions are measured using 3 categories — Scope 1, 2 and 3.

2.5 Our corporate role

To work effectively as a business, we operate and use our corporate assets, such as vehicles and offices, which contribute to our carbon emissions. It is mandatory for Places for People to annually report the organisational emissions through the Energy Saving Opportunity Scheme (ESOS) and Streamlined Energy and Carbon Reporting (SECR). The reporting frameworks are intended to encourage the implementation of energy efficiency measures, with both economic and environmental benefits.

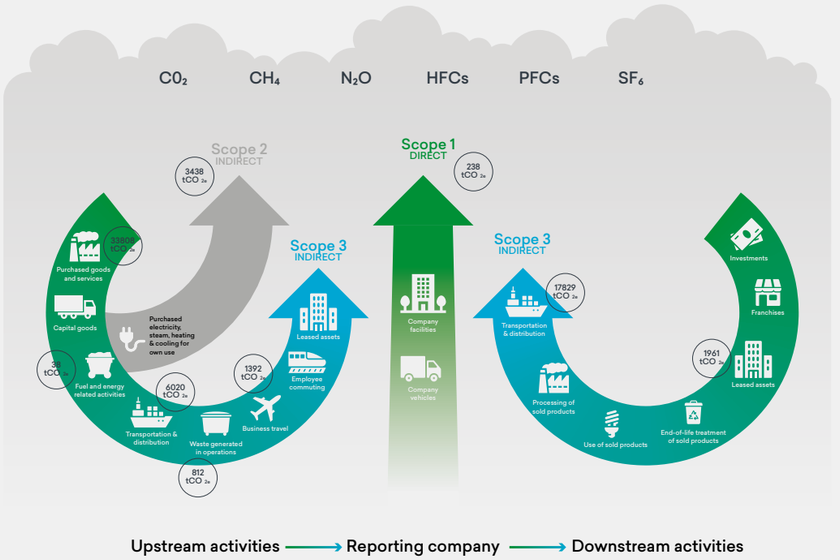
The tables in ***Appendix C*** detail our SECR reporting for 2021/22 compared to previous years. These provide the baseline for our framework corporate targets and have been reported in our 2022 Annual Report.

As a business it is critical that we consider our corporate emissions through the lens of what emissions are direct and indirect, upstream and downstream, to effectively prioritise and consider what approaches are needed strategically and tactically (see Figure 1).

As an example, changing our repair fleet to Electric Vehicles (EVs) has a direct impact on our emissions whereas providing customers with charging opportunities would not have an impact on our emissions. It may still be the right decision from a product and services perspective, but we need to be clear about how it impacts on our emissions and the rational for action in different cases.

In addition to meeting legislative requirements, our practical focus as a business will initially be on doing more to reduce our scope 1 and scope 2 carbon emissions[2] while also laying the groundwork to make progress on scope 3 emissions. To achieve the reduction, we need to establish our baseline carbon footprint. We propose to measure the Group carbon footprint in line with the Greenhouse Gas (GHG) Protocol. Measurement will start in April 2023, using data from 2022/23 to avoid significant impacts from the Covid pandemic. In the longer term we will want to look at our scope 3 emissions. This will mean working on our own policies and practices and those of our suppliers. We will want to start early conversations with them about our expectations so that they can prepare for this transition.

Figure. 1 GHG protocol explanation of carbon emissions scope



2.6 The role of housing in reducing emissions

One of the most significant challenges on environmental sustainability is reducing the level of carbon dioxide (CO_2) emissions. The Government has legislated for the UK to reach net zero carbon by 2050, with intermediary targets of a 68% reduction by 2030 and 78% by 2035, anchored to 1990 levels. The UK Green Building Council highlights that energy use from existing homes represents 48% of UK built environment emissions. This in turn represents 16% of total UK domestic emissions. Of this, 62% are produced by heating[3]. This means homes and heating systems have the capacity to make a meaningful contribution to society's reduction in emissions.

2.7 The impact of rising energy costs

The relationship between energy users and energy supplies is shifting dramatically. The switch towards electrification is expected to double demand on the grid by 2050. As a consequence we expect local generation to play a greater role in supply and for distribution to become 'smarter' to enable efficient utilisation of supply. Given the competition for utilities local infrastructure needs strategic planning and there will be trade-offs which need to be made between homes and other uses. Energy costs are likely to continue to be high until the transition to local generation enables direct access to affordable renewable sources. With housing and energy intrinsically linked we should not be considering the development and delivery of either in isolation and without consideration of the impact on customers.

2.8 New homes developments

All new build homes will be Net zero carbon ready by 2025. A recent report[4], funded by Places for People, identified challenges and opportunities and the trade-offs in delivering net zero ready homes.

The trade-offs require balancing the challenges such as additional development costs against the viability of the development, the environmental and user benefits, the improved reputational and brand advantages against a lack of financial incentives, lack of capacity and skills in the workforce and a lack of reliable technologies against the benefits and opportunities which can be achieved.

2.9 Places for People's approach to retrofit of existing homes

As 80% of the UK's 2050 housing stock has already been built, future proofing new build homes will not be enough — as a priority we need to start to plan to retrofit existing stock to meet these aims. The Climate Change Committee (CCC) has made it clear that there must be complete elimination of greenhouse gas emissions from housing. As there are around 4.4 million social homes in England, Housing Associations will play a critical role in delivering this.

The UK's housing stock is the oldest and least energy efficient in Europe. The Institute for Government (IfG) found that a UK home with an indoor temperature of 20C and an outside temperature of 0C lost on average 3C after five hours — up to three times as much as homes in European countries such as Germany. More than four-fifths of UK homes are also currently still heated by gas boilers, which is much higher than most countries. Energy prices have increased dramatically and while wholesale prices have fallen the expected reductions in government subsidies over 2023 and the continued need for investment in a shift for renewable means that customers are unlikely to see bills go down until they benefit from energy efficiency measures or upgrades. This means the right investments in energy efficiency measures are good for the environment and good for customers.

Our approach to retrofitting existing homes draws significantly on the research work of the National Housing Federation[5] (NHF)

[3] Climate change - UKGBC - UK Green Building Council

[4] Net zero ready new build housing: Benefits and Barriers to delivery Cambridge Centre for Housing and Planning Research April 2022

[5] Defining net zero for social housing — National Housing Federation July 2021

which encompasses the current statutory advice of the CCC. The NHF concludes that the primary role that Housing Associations must play is to eliminate our sector's share of direct (produced directly from the burning of carbon-emitting fuels in homes to heat space and water for example, gas boilers in our homes) and regulated emissions (produced, either directly or indirectly, by a household's use of structural / fitted energy consuming items over which a landlord has control. Examples include space and water heating mechanisms and mains lighting).

Our priorities for retrofit investment plans are:

- Delivering fabric first.
- 'No regrets' investments.
- Utilising government funding to tackle hard to treat homes.
- Utilising government funding to achieve change at scale for those customers in greatest need of energy efficiency.
- Exploring innovative options to enhance our future delivery.
- Supporting the development of the skills pipeline.

2.10 Our approach to Places Leisure facilities

For existing facilities, we are working with our clients to find ways to increase our use of renewable energy whilst continually monitoring our energy consumption. We balance the need to maintain our centres' comfort level for customers and the need to reduce consumption where possible.

Where we deliver new facilities, we work with our partners to deliver best practice and value for money throughout the design and construction stages of our new leisure centres. At our leisure centre in Wokingham we partnered with Pellikaan Construction Ltd. The principal design factor has been fabric first. This has ensured low U-values for thermal insulation and super air tightness. With the addition of low carbon technology such as Air Source Heat Pumps, solar PV arrays, thermal mass heating and Dali LED lighting controls. Wokingham Leisure Centre is one of the greenest leisure centres in the U.K. In partnership with our clients, we will continue this approach with future leisure centres.

Section 2

3. IMPLEMENTATION

3.1 Places for People hierarchy

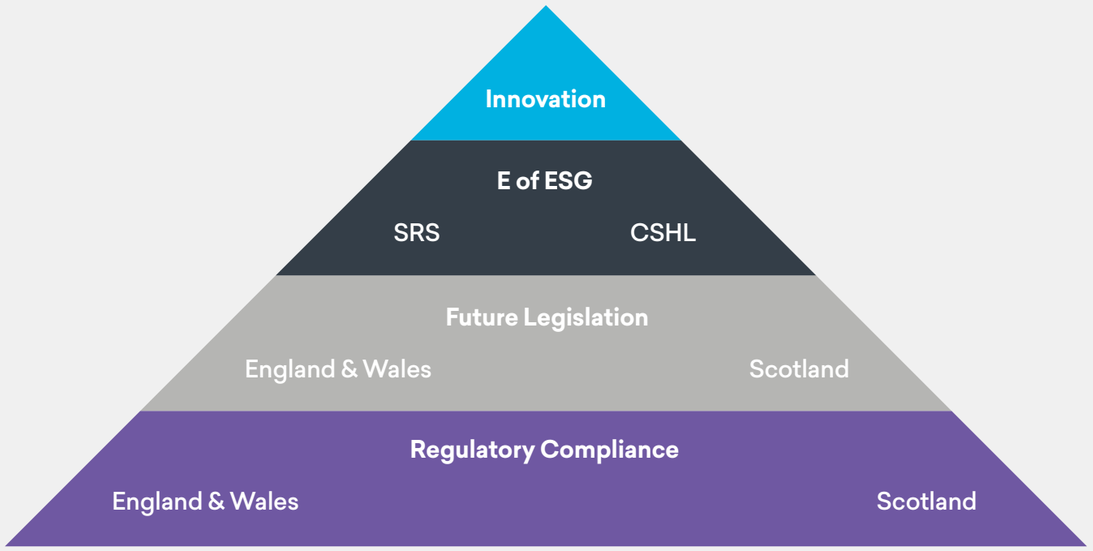
In light of the approach set out in section 1, our environmental sustainability strategy has been developed on key pillars (see Figure 2 below) reflecting these priorities:

- An immediate need to deliver against existing legislative frameworks with finite economic resources.
- An urgent need to reduce future financial exposure by effectively future proofing new homes.
- An urgent need to enhance our activity with measures that will contribute to recognised ESG indicators and therefore strengthen our ESG offer and company value.
- A long term need to strengthen our offer and meet future requirements such as Net zero carbon through innovation and trialling and testing of new technologies.

Given the potential breadth of action, this hierarchy will support us in decision making to identify those actions which will make the most impact for the investment required.

Although many government regulations are either consistently applied or aligned in principle across England, Wales and Scotland, there are some instances where they differ across countries. We will take this into account as the performance framework develops and progress is reported.

Figure. 2 Environmental sustainability strategy priorities



3.2 Environmental sustainability themes

We have grouped the legal obligations and ESG standards into five themes. The five themes each have government regulations, ESG and environmental sustainability targets. The performance targets are identified in our performance framework in Appendix A.

- **Carbon emissions**
  Reduce Scope 1, 2 and 3 carbon emissions across the business.
- **Climate resilience**
  Adapt properties against the effects of acute and chronic climate events e.g., floods, temperature rises.
- **Ecology**
  Minimise biodiversity losses caused by building development, increase green space provision and reduce pollution.
- **Sustainable resource management**
  Promote procurement of sustainable and responsibly sourced resources and circular use by reducing consumption, increasing re-use and re-cycling of all resources, including construction materials, and reducing waste to landfill.
- **Customer and colleague engagement**
  Increase customer and colleague engagement in environmental sustainability.

3.3 Customer, colleague and partner involvement

We will engage with our customers, colleagues and partners to deliver the strategy and facilitate a change in culture which ensures environmental sustainability is considered and reflected. Key to the success of our strategy will be leadership, learning and engagement and we will be working with the Unlock Next Gen team to develop our approach.

3.4 Performance indicators

To measure our performance in delivering the strategy we have worked with business areas to develop a suite of performance targets. These are set out in the table at Appendix A.

Establishment of the first-year baseline measurement will inform KPIs, with the metrics and KPIs assessed at least annually to monitor progress and ensure continual improvement. We will carry out audits to ensure comprehensive reporting.
The dataset will automatically feed into a dashboard to give transparency in reporting. The dashboard will be used by the Environmental Sustainability Management Group to support and monitor progress.

3.5 Governance

Performance will be assessed monthly by the Environmental Sustainability Management Group (ESMG) and issues will be escalated first to this group and then the Executive team if necessary. The ESMG is a cross functional meeting, representing all business units across Places for People. The purpose is to provide oversight and direction on the Environmental Sustainability strategy, and review progress of all environmental sustainability initiatives.
The Group will also review and take ownership of any mitigating actions relating to key risks, issues and roadblocks.

3.6 Initiatives

We have identified a small number of initiatives to signal our intentions and accelerate and embed the culture change in how we do business. These are elimination of single use plastics, improved carbon literacy and an electric vehicle strategy. Following our acquisition of Igloo Regeneration, we are also aiming to look at their best practice in this area including plant-based expenses policies.

3.7 Innovation

Innovation is vital to achieving environmental sustainability, researching new technologies where gaps exist. We will work closely with the Innovation team to ensure there is alignment and that they are commissioned on work which will inform the development of our strategy and plans as well as ensuring we can learn from their work and can scale up trialled and tested innovative technologies, products, and approaches.

APPENDIX

A: Performance framework
B: Alignment to UN Sustainable Development Goals
C: Streamlined energy and carbon reporting

Appendix A

PERFORMANCE FRAMEWORK

Legend

- A Assets & Investments
- B Developments
- C Workplace Solutions
- D Places for People Group
- E Places Leisure
- F Procurement
- G Places Management

Our approach to reducing carbon emissions

We will	We will achieve this by	By when
Invest in our existing homes to improve the energy efficiency and reduce the carbon emissions A	We will improve the average SAP rating of our homes from 72.4 to 76.9	By Oct 2027
	We will improve the energy performance of at least 600 homes per year	By Dec 2025 in England
	All our homes will be EPC D or above by 2025 in England	EPC C by Dec 2030 in England
	All our homes will be EPC C or above by 2030 in England and EPC B or above by 2032 in Scotland	EPC B by Dec 2032, in Scotland
	We will improve insulation to at least 2500 homes	By Dec 2024
	We will whole house retrofit 228 homes	By Sept 2023
Increase the EPC coverage to 75% A	We will complete EPCs on void works and through stock condition surveys	By April 2023
Achieve EPC B across all Places for People owned workplaces C	**Our Carbon Reduction Plan for our offices details the strategic asset management plans** Employ BREEAM standards on large scale projects, defined as office refurbishment projects > £500K **NB:** BREEAM provides whole lifecycle assessment and certification across all built environment asset types to positively impact the future of the built environment, associated investments, and their impact on the planet	By 2030
	Where our commercial buildings are EPC C or below, we will reduce carbon emissions by 3% each year	
	We will conduct in-depth facet surveys of estate properties including assessing environmental sustainability	
Stop the installation of gas boilers in corporate offices C	We will remove of gas boilers via end-of-life cycles or as part of projects when upgrading workplaces. Heating systems will be replaced by low carbon heating system replacements	By Dec 2035
Reduce our overall corporate energy consumption by 20%, using a 2023/24 baseline C	We will baseline carbon data for 2023/24, using the Mackay Carbon Calculator	By March 2025
	We will establish metrics and benchmarks for by March 2024	
We will reduce the CO_2 emissions of IT Equipment D	We will work with partners to establish our baseline for recycling our IT assets and set targets for continuous improvement	By March 2024
Reduce our scope 1 and 2 CO_2 emissions by minimum 45% using 2019/20 baseline C	Energy company decarbonisation and improvements to upgrade thermal values of our assets	By March 2030
	Reduction in energy consumption through ongoing energy saving learning and advisory signage across our offices	
	Ensure appropriate room and space temperature in our offices	

We will	We will achieve this by	By when
Our leisure centres will make a year on year saving of 5% on gas, electricity, and water consumption E	We have access to data for gas and electricity consumption, figures are reviewed daily. The information is shared with each site which have a recorded action plan to reduce consumption. The baseline consumption in 2019/20 is: Gas 118,451,661.67 kWh Electricity 46,785,923.60 kWh Water 719,089.97 m3	Ongoing annual target
Our leisure colleagues will aim to reduce our business travel mileage by 10,000 miles per year E	We will increase the number of virtual meetings; we will travel by rail or in groups and we will increase hybrid working. Our baseline for 2019/20 is 1,118,747 miles	Ongoing annual target
Reduce CO_2 emissions from transport D	Incrementally reduce the availability of carbon emitting vehicles, ensuring all new company car orders are electric	By 2025
Reduce CO_2 emissions from transport G	Create a baseline for CO_2 production based on fleet details and mileage to give overall, current position. We will set reduction targets in-line with overall objectives of 25% reduction by 2027. 100% by 2035	By March 2027 and March 2035
Reduce the number of gas boilers in our homes G	Current switch over at 0.17% (100 properties to renewable heating) Target for 2023/24 = 200 properties	By March 2024
Introduce carbon reduction into our procurement strategy D	We will ensure carbon reduction is included in all relevant tenders by asking qualitative questions, that are proportionately weighted and scored by the business	By 2023
Reduce operational carbon on new build sites by 20% B	During 2023/24 we will measure our operational CO_2 emissions. We will use this as a baseline, and we will set an annual target	By 2024
	We will research and trial low or zero carbon site	
Reduce carbon emissions from new homes B	We will install all new homes with low carbon heating, and we will monitor the performance of newly installed Air Source Heat Pumps	By 2025
Reduce our electricity and water consumption on our development, placemaking and regeneration sites B	We will measure and understand our electrical and water consumption. We will use this as a baseline, and we will set an annual target	By 2024

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Our approach to ensuring a climate resilience

Climate resilience is our ability to anticipate, prepare for, and respond to hazardous events, trends or disturbances related to climate.

We will	We will achieve this by	By when
Deliver a detailed Climate Change Risk and Resilience Assessment for our property assets A	Using high level internal and external data, we will take a Strategic Risk overview of assets managed by Places for People. Assets will be allocated a RAG rated assessment of risk highlighting numbers and severity of properties at risk due to climate change	By January 2023
Reduce the number of homes impacted by overheating A	Installing 500 monitoring systems in 2023/24	By March 2024

Our approach to improving ecology

We will	We will achieve this by	By when
Increase the amount of green space available G	Measuring the amount of green space across our existing assets, and set targets for long term improvements and social value we can add for customers through green spaces	By March 2024
Increase the biodiversity in existing schemes G	We will measure the biodiversity across our existing assets and Identify ways in which we can increase biodiversity within our schemes through various initiatives within the community	By March 2024
Eliminate the use of pollutants in cleaning products and pesticides G	We will measure the volume of pollutants we use and set a long-term target for reduction in use. Set target for reduction annually and by 2030 and search for cleaner alternative products which use less pollutants	By March 2024
Reduce our impact on the ecology and biodiversity of our new build sites B	Develop sites to suit local neighbourhood plans, employ consultants to prepare reports on flood risk, ecology, arboriculture, and archaeology where necessary We will comply with planning guidance for biodiversity net gain	Compliance aligned to the introduction of legislation
Deliver a risk assessment for unplanned discharge to water courses C	We will assess our work places for unplanned discharge to water courses, including drainage systems, septic tanks and sump systems. We will set targets to ensure a reduction in discharges	By March 2024
Drive continuous improvement in the biodiversity surrounding our workplaces C	Assess workplaces and surrounding areas to identify all foliage, fauna and animal habitat. This information will inform target setting to continually improve the biodiversity the surrounding our workplaces	By March 2024

We will	We will achieve this by	By when
Complete surveys for external waste receptables to ensure they are suitable to avoid environmental hazards C	Ensure all external waste receptables are lidded to prevent inadvertent environmental hazards	Gather data to enable target setting for 2024
Our property management companies will reduce their impact on ecology D	Source eco-friendly suppliers and products to reduce our impact on ecology, water course, fauna and flora. We will monitor and record changes in products and suppliers	

Our approach to ensuring sustainable resource management

We will	We will achieve this by	By when
Places Management will reduce the water consumption of its operations G	We will measure our water consumption and set targets for achieving an annual reduction of our water consumption until 2030	By March 2024
Reduce consumption of energy and water across all workplaces C	We will assess all workplaces to install digital water meter readers to capture the consumption, we will use the data to set targets. We will complete monthly readings within the core documentation	By March 2024
Reduce the operational water consumption on our new build sites B	We will gather meter readings to measure our water consumption and set targets to reduce our consumption	By March 2024
Ensure 97% minimum of waste is diverted from landfill at a rate of 97% from all workplaces C	Waste is managed by our partners who report annually on diversions from landfill	Annual reporting
Reduce the demand for water and raw mining activity in the manufacture of IT assets D	Water consumption and raw earth mining are activities used during the manufacture of IT equipment activity. By refurbishing our IT assets, we can reduce the demand for new IT equipment. We will capture data to establish the current position and set targets for continual improvement	By September 2023
We will reduce our consumption of single use plastics (SUP) A B C D E F G	We will measure our consumption of SUP, we will set a baseline and targets for reduction in our consumption of SUP	By March 2024
We will ensure our materials are responsibly sourced G	By 2027 all materials used in Places Management and Planned Investment will have EPD (Environmental Product Declaration). During 2023/24 we will measure and create a baseline. In 2024/25 20% of products will have an EPD	By March 2025
RMG will improve the sustainability of products D	RMG will work with Places for People Procurement to develop a supply chain to improve the availability of sustainable and eco-friendly products. We will ensure the companies we use are able to align with the RMG commitment to reducing waste and water consumption	By March 2024

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Our approach to engaging with people

We will	We will achieve this by	By when
Engage with all colleagues across the Group to deliver environmental sustainability learning D	Deliver 10 sessions of Power Hour learning to colleagues by March 2023	By March 2023
Engage with learning and development to deliver mandatory Environmental and ESG training for Places Academy D	Developing course content to enhance colleagues understanding of the vital role environmental sustainability and ESG have within places for People	By March 2023
Engage sustainability champions across Places Management G	Engage 10 sustainability champions across Places Management to showcase examples of good environmentally sustainable practices	By April 2024
Engage with customers on key environmental sustainability topics G	Develop useful material for customers to understand ways of reducing their own carbon emission from their homes. 'My Place' hub which has useful tips and advice for customers	

Appendix B

ALIGNMENT TO UN SUSTAINABLE DEVELOPMENT GOALS

Carbon emissions

Reduce Scope 1, 2 and 3 carbon emissions12 across the business

Climate resilience

Adapt properties against the effects of acute and chronic climate events e.g., floods, temperature rises.

Ecology

Minimise biodiversity losses caused by building development, increase green space provision and reduce pollution.

Sustainable resource management

Promote procurement of sustainable and responsibly sourced resources and circular use by reducing consumption, increasing re-use and re-cycling of all resources, including construction materials, and reducing waste to landfill.

Customer and colleague engagement

Increase customer and colleague engagement in environmental sustainability.

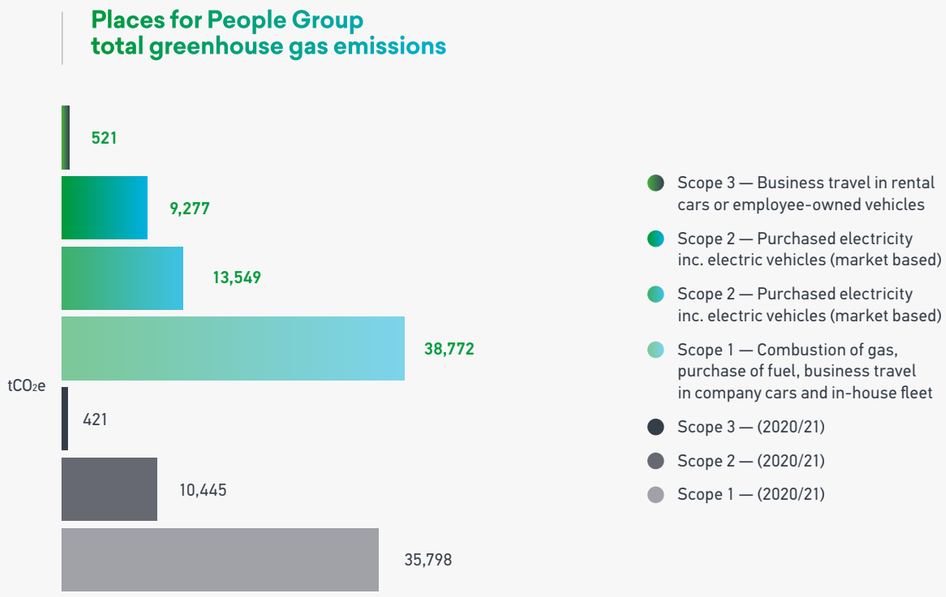
Appendix C

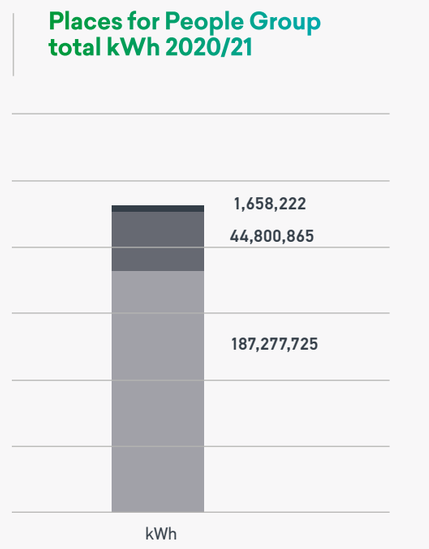
STREAMLINED ENERGY AND CARBON REPORTING

Figure. 1 Year-on-year emissions

Estimations	2021/22	2020/21	2019/20	YOY% change 2021/22 vs 2020/21	YOY% change 2021/22 vs 2019/20
kWh	**270,197,534**	233,736,812	334,569,149	15.60%	–19.24%
tCO_2e loc.	**52,842**	46,656	68,508	13.26%	–22.87%

Figure. 2 Total greenhouse gas emissions and energy consumption





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