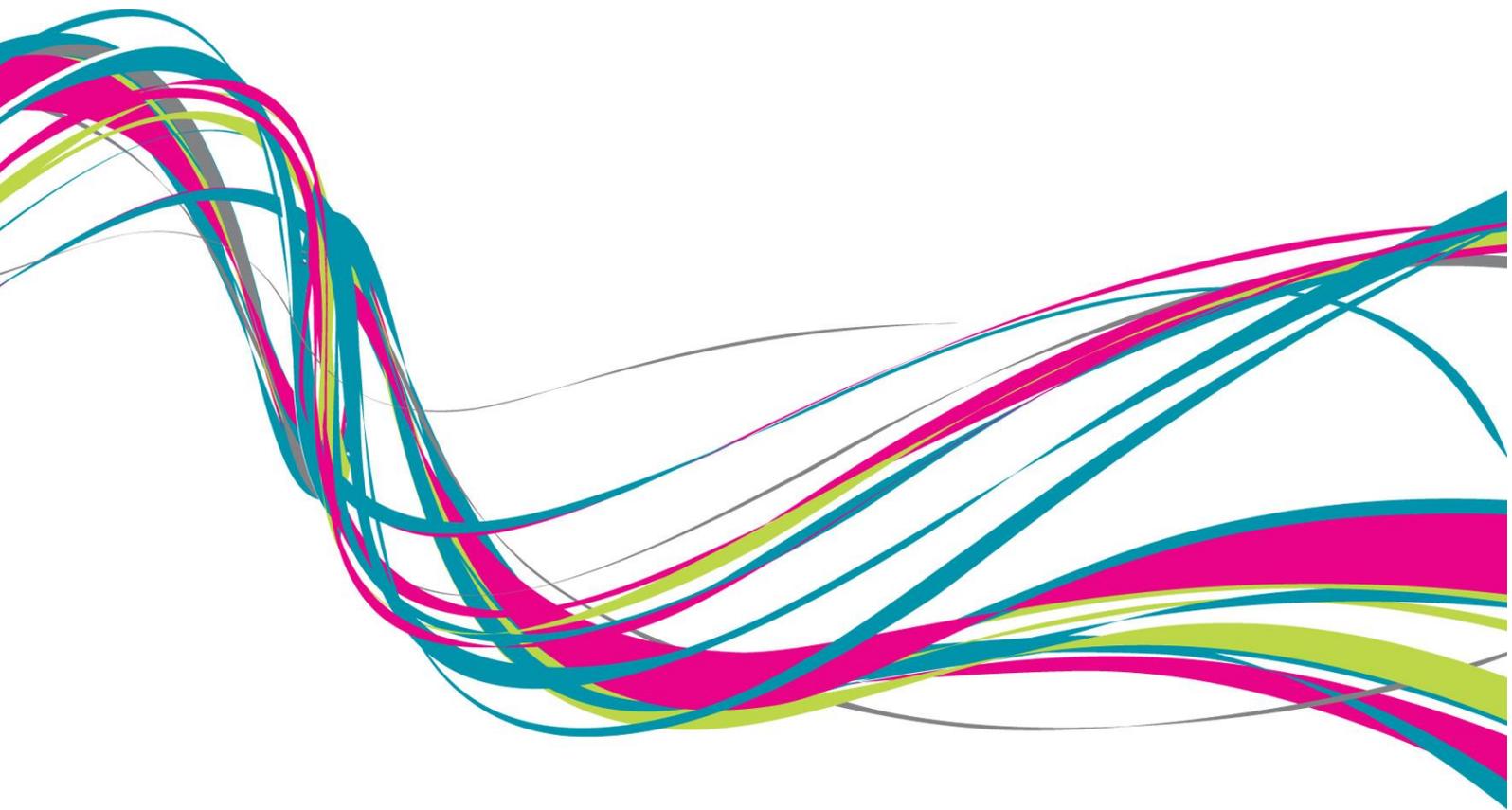




**Incommunities' Group
Environmental Sustainability Strategy
2016 – 2025**



The Pathway to 2025

Foreword

We have invested heavily in improving the energy efficiency of our housing stock in the past decade, but recognise that running an environmentally sustainable business requires us to go further in addressing our environmental impacts. We are now taking a more coordinated, proactive approach to addressing environmental sustainability when considering improvements to our housing stock and in delivering our services. This has culminated in the production of this Strategy.

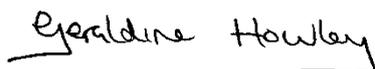
We are improving the quality of the data we hold on our housing stock and carrying out a robust analysis process to identify those homes which are in most need of energy efficiency improvements. This will allow us to prioritise and target improvement works to customers who are most in need and help us plan programmes of sustainability works for future years. We recognise that many of our customers are in fuel poverty and we seek to address this through tackling the root causes of fuel poverty.

For the first time we have calculated a carbon footprint for Incommunities. This shows how delivery of our services impacts on the environment, by looking at carbon dioxide emissions associated with running our offices, our fleet vehicles and waste disposal. By measuring the environmental impact of delivering our services, we can identify opportunities to reduce wastage, make cost savings, improve Value For Money and demonstrate the impact of our sustainability initiatives.

We remain committed to providing high quality homes at an affordable price, as set out in our strategic plan, *The Pathway To 2025*. We will seek out opportunities for innovation and funding to deliver – and where possible go beyond – our environmental objectives. Alongside *The Pathway To 2025*, our Environmental Sustainability Strategy is designed as a flexible framework to ensure we can adapt our activities to take account of external influences.

Through our environmental sustainability work we can make sure that we improve the lives of future generations, as well as addressing the challenges of today.

Geraldine Howley
Group Chief Executive



Dave Procter
Group Chair



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Executive Summary

This Strategy builds on the principles outlined in our Environmental Sustainability Policy by setting out strategic objectives to deliver our environmental sustainability mission statement:

Delivering sustainable homes through environmentally-friendly services

The objectives have been grouped under three themes: our homes, our people and our organisation. They were arrived at by analysing our housing stock data, our environmental impacts as an organisation (see page 9 for more detail on our carbon footprint) and asking customers and staff what aspects of environmental sustainability are important to them.

Our homes:

- Improve the environmental performance of our homes to a minimum energy efficiency rating of E by 2020 and D by 2025¹, and achieve an average SAP rating of 73 by 2025.
- Seek to reduce service charges associated with energy costs and protect customers from rising energy prices.
- Support customers to reduce water consumption and waste to landfill.
- Tackle the sources of fly tipping, aiming to reduce the number of incidents year on year.
- Seek cost effective opportunities to improve the quality of Incommunities' green spaces and develop wildlife habitat.
- Assess the impact of climate change on our housing stock and customers and identify mitigation actions.

Our people:

- Help our customers save money on utility bills through provision of advice, guidance and support.
- Support vulnerable customers to take advantage of the switch to smart meters.
- Inspire our customers and staff to take action on sustainability, through education and engagement.

Our organisation:

- Reduce Incommunities' carbon footprint by 10% by 2025.
- Document and demonstrate compliance with all relevant environmental legislation.

¹ Excluding homes where customers refuse improvement works

- Require procurement of contracts to take into consideration environmental issues.
- Identify opportunities to increase the proportion of supplies that are sustainably sourced whilst retaining a value for money approach.

The Strategy looks to achieve an optimum balance between economy, efficiency and effectiveness in line with Incommunities' Value For Money Strategy. A key focus of our environmental sustainability work is refining our service delivery to reduce waste and be more resource-efficient.

There are two further strategic objectives that relate to reporting and review:

- Update Incommunities' carbon footprint and publicly report on progress against the Environmental Sustainability Strategy objectives annually
- Aim to achieve SHIFT Gold accreditation by 2020².

This Strategy provides a roadmap for our environmental sustainability work through to 2025, however given the current turbulence in the UK policy arena, we will look to carry out an interim review and update in 2020 to take account of policy and technological change and ensure our strategic objectives are fit for the next five years.

² SHIFT is a network and benchmarking tool for housing associations to assess their environmental sustainability performance

Introduction

What environmental sustainability means to us

Our vision of 'Improving Lives Incommunities' focuses not just on the here and now, but on improving the lives of future generations. As a large social housing provider and employer, we strive to improve the environmental quality of our housing stock and make sure that, wherever possible, the services we deliver have a positive impact on the environment.

We define environmental sustainability as meeting the present needs of our customers and organisation, without reducing the environment's capacity to allow all people to live well, now and in the future.

This Strategy sits alongside our Environmental Sustainability Policy and sets out strategic objectives and targets to provide more sustainable homes and services and reduce our environmental impact.

Background and context

National and legislative context

The UK has a legal duty under the Climate Change Act (2008) to ensure that emissions of greenhouse gases in 2050 are at least 80% lower than in 1990. Interim targets (carbon budgets) are set at a 35% reduction by 2020 and a 50% reduction by 2025.

The domestic residential sector is the third largest source of non-traded emissions³ and is projected to account for between a fifth and a quarter of non-traded emissions between 2015 and 2035. In Bradford district, domestic emissions account for 39% of total emissions. Most of these emissions are from burning natural gas and oil for space and water heating. Improving the energy performance of our housing stock will not only reduce emissions, but will make our properties more affordable for customers now and in the future.

Government decisions over the past two years on the pathway to achieving the UK's emission reduction targets have resulted in some uncertainty in the energy sector, particularly around renewable technologies and energy performance standards for new build properties. Recent political changes relating to the vote to leave the EU also make the long-term future of environmental policy and funding unclear at this time.

³Emissions trading are a market-based approach to reducing greenhouse gas emissions focused on large, industrial energy users. Non-traded emissions include those from homes, transport, agriculture, businesses and public services

As a business, we also have a duty to comply with various pieces of environmental and waste management legislation. These are documented as part of our environmental management system.

Funding for energy efficiency measures

National funding for domestic energy efficiency measures is provided through the Energy Company Obligation (ECO) – a programme of funding that is due to finish at the end of March 2017. The 2015 Spending Review set out Government plans to have a supplier obligation in place until 2022 and initial changes to the ECO programme were consulted on from June – August 2016.

A number of changes were proposed in the consultation which would impact the ability of Incommunities to leverage funding to carry out energy improvement works to our homes. If these changes go ahead, key impacts would be as follows:

- ▶ The funding which has helped us install cavity wall insulation and loft insulation to many properties will end at the end of March 2018.
- ▶ From April 2017, all social housing tenants living in a property with an EPC band of E, F or G will become eligible for funding under the Affordable Warmth scheme. Funding may cover the costs of insulation measures, first time central heating and possibly renewable heat technologies (depending on the outcome of the consultation). Under the proposals, social housing tenants will not be eligible for boiler or other heating system replacements which are open to private tenure households.
- ▶ The minimum level of obligation for insulating solid wall properties will be carried forward to 2017-18, however it will be lower than the current obligation.

Bradford context

Bradford's population is projected to increase by 14% over the period 2012-2037, generating demand for an additional 1,532 – 2,563 homes per year⁴. The shortage of affordable housing is a major issue for both urban and rural areas⁵. An increased aging population will create a higher demand for customers requiring care and support for independent living into the future.

Bradford also has high rates of fuel poverty with over 13% of households being classed as fuel poor. Addressing this through continuing to improve the energy efficiency of our housing stock and reducing customers' bills must remain a priority.

⁴ Bradford Housing Requirements Study: Updated Demographic Analysis and Forecasts (September 2014)

⁵ Bradford Metropolitan District Council, Core Strategy Development Plan Document: Publication Draft (February 2014), p19

The topography of the district means that areas at risk of fluvial flooding are confined to river valleys, particularly the River Aire, River Wharf and South Pennine Moors. Surface water flooding may also be an issue, particularly in more urban areas.

Many upland areas of the district are very exposed to weather conditions, particularly driving wind and rain. This should be taken into account when planning sustainability works relating to housing stock in these areas.

By 2050 Bradford is likely to be experiencing drier, hotter summers and wetter, warmer winters. This could result in a shift in domestic (and business) energy demand from heating in the winter to cooling in the summer, and an increase in flood events.

Incommunities' context

Incommunities' housing stock is split fairly evenly between houses and bungalows and flats, maisonettes and bedsits. This high proportion of flats can be both an asset and a challenge.

Flats typically have a higher energy performance than houses, but it can be more difficult to significantly improve the performance, and measures are often required to be applied to whole blocks rather than individual properties. Flats are also more likely to be electrically heated and installing lower-cost, low-carbon replacement systems to mid and high rise flats can be costly and technically challenging.

Around 75 per cent of Incommunities' homes are classed as 'traditional' construction; the vast majority of which have a cavity wall structure which can usually be insulated. A small number (less than two per cent) of older properties have a solid wall structure which requires external or internal wall insulation.

The remaining 25 per cent of stock are classed as 'system built'. These were mostly constructed in the 1950s and 1960s and were built using either steel frames or concrete panels. External wall insulation has been added to many of these properties over the years, but there are still a number which have not yet been insulated.

Through the Decent Homes programme, Incommunities carried out significant improvement works to many properties, including installation of insulation, double glazing and A-rated boilers. We have also provided support to customers to help them reduce their energy bills through the Community Switch service, and a 'Green Doctor' pilot project carried out in 2016.

Our challenge now is to focus on improving the hard-to-treat properties, and in particular bringing the small number of properties with EPC ratings of E and F up to a higher energy performance standard.

Partnership working

Incommunities is involved in a number of partnerships with local public and private sector organisations and universities. The objectives and actions associated with this Strategy directly align with the ambitions of the Bradford District Plan (2016-2020) and the Bradford Housing Partnership to make homes in Bradford more energy efficient.

We are also working in partnership with Bradford University on a Cost in Use project. The project aims to create a decision support system to help identify the best ways in which we can increase the wellbeing of customers and affordability of Incommunities' properties. The outcomes of the Cost in Use project will inform the future development of this Strategy.

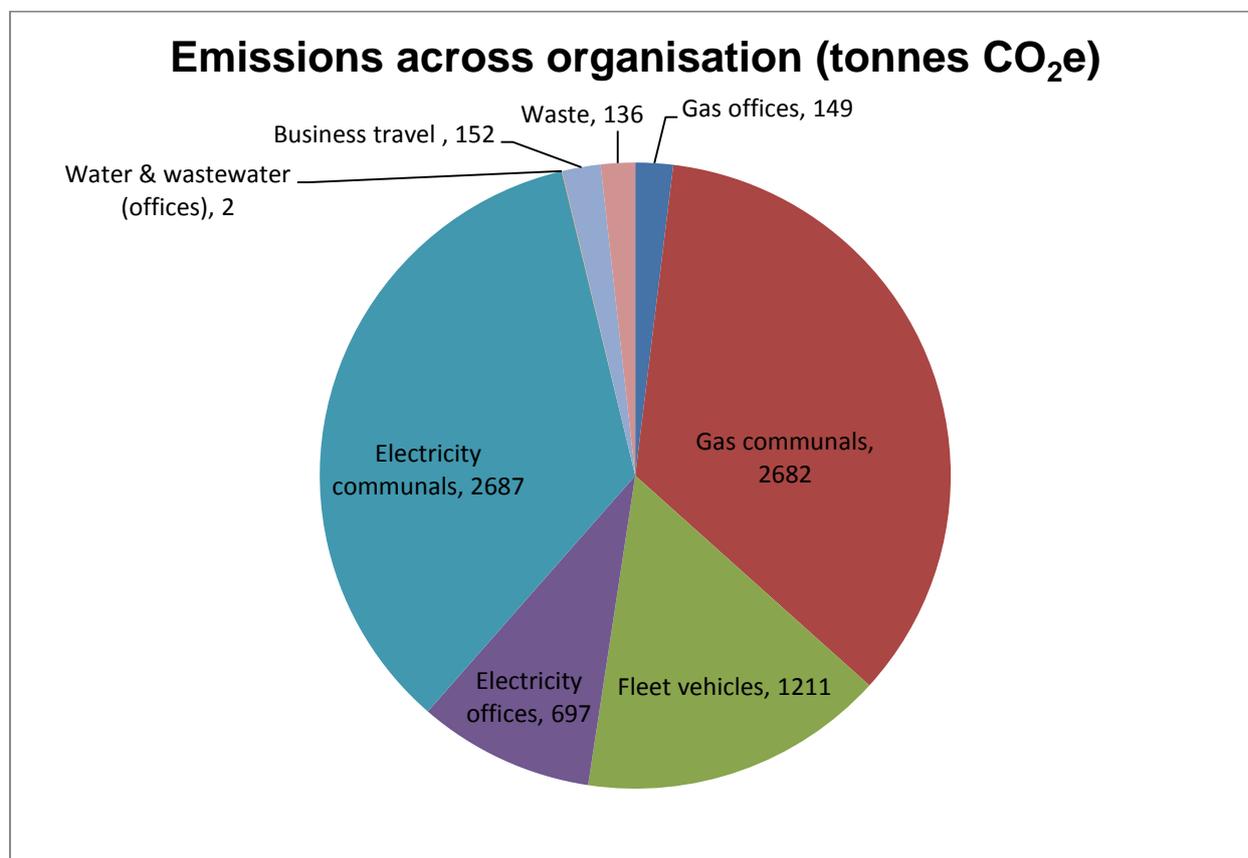
Measuring our impact

Carbon footprint

In order to measure our environmental impacts and establish a baseline against which to set targets, we calculated our carbon footprint for the year 2014-15 based on the Greenhouse Gas Protocol⁶. Data on Sadeh Lok and Lumia Homes operations are not currently included, but we are looking at ways of obtaining the data for inclusion in future years.

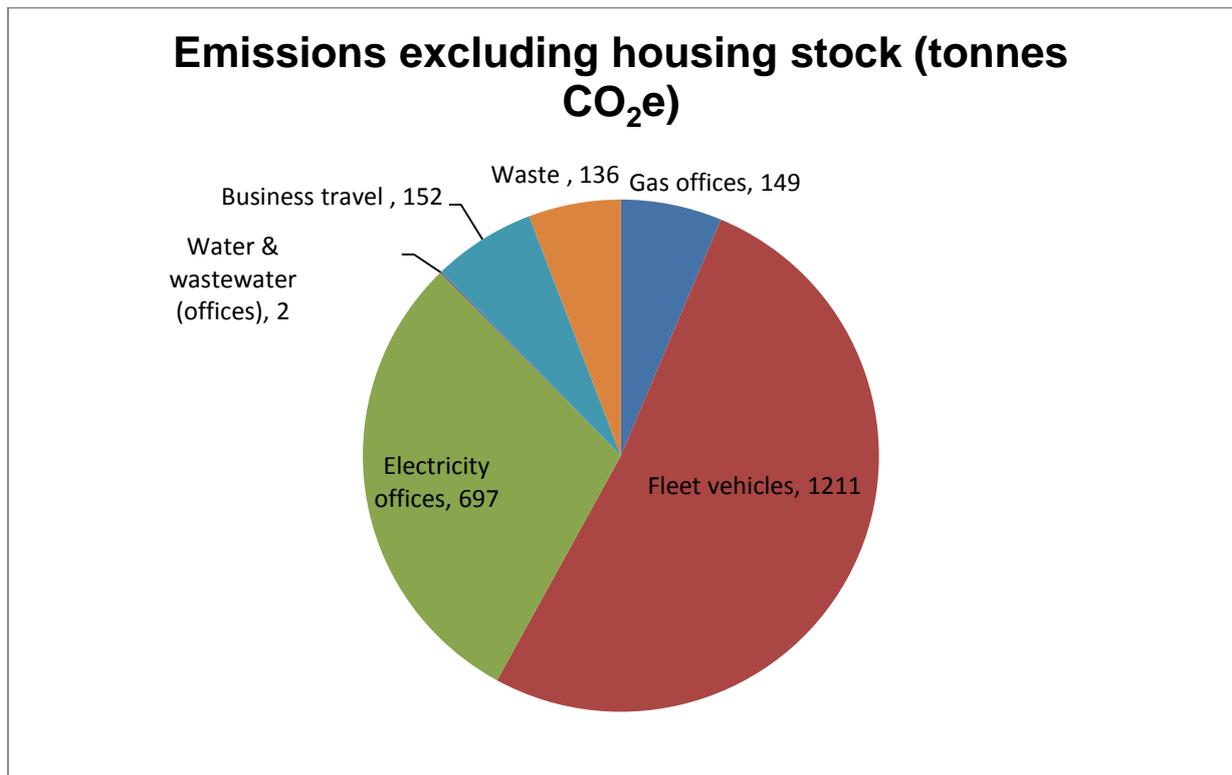
Figures 1 and 2 illustrate the carbon footprint for 2014-15. We have recently calculated our footprint for 2015-16 which shows a small reduction in total emissions. We aim to increase this reduction in future years.

Figure 1: Baseline carbon footprint for Incommunities including communal gas and electricity supplies



⁶ The Greenhouse Gas (GHG) Protocol is a global standard on measuring, managing and reporting greenhouse gas emissions. Carbon factors used were Defra factors for the relevant year (i.e. 2014 figures were used for the 2014-15 financial year).

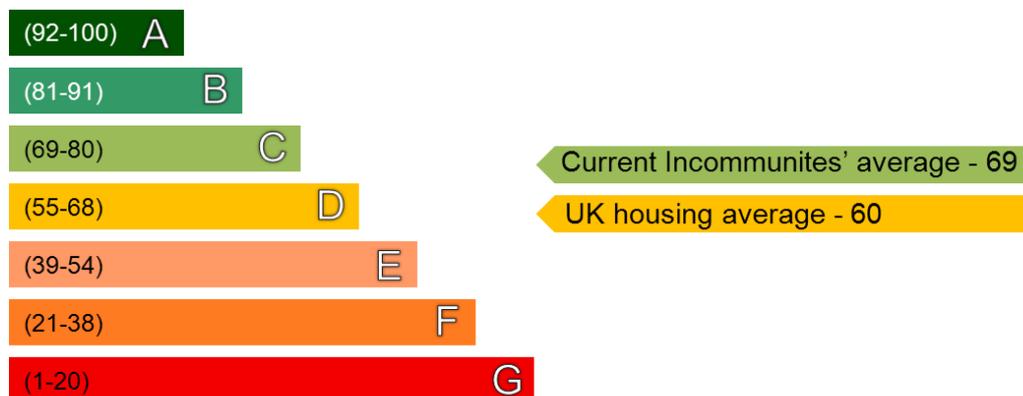
Figure 2: Baseline carbon footprint for Incommunities excluding communal gas and electricity supplies



Energy efficiency of housing stock

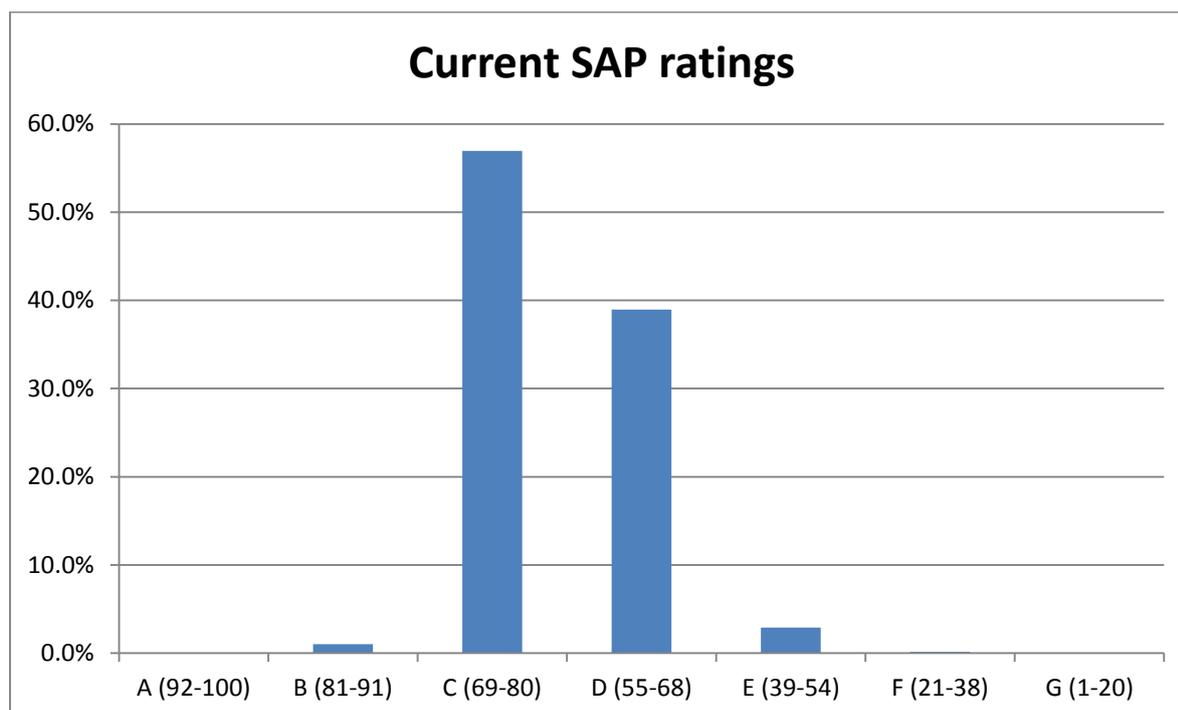
The SAP (Standard Assessment Procedure) rating is a measure of the overall energy efficiency of a home, calculated using annual room and water heating costs for a standard heating regime. SAP ratings are expressed on a scale of 1 to 100, where 1 represents a very inefficient home and 100 represents a home with 'zero energy cost', as illustrated in Figure 3.

Figure 3: Energy Efficiency Rating scale



The average SAP rating for Incommunities' properties is SAP 69, or EPC Band C. This is similar to the average for other SHIFT landlords⁷ and higher than the average for the social housing sector. The average rating for a property in England and Wales is SAP 60 (Band D). Figure 4 shows the current distribution of Incommunities' properties across SAP bands.

Figure 4: Distribution of Incommunities' properties across EPC bands



Customer and staff consultation

As part of the research for this Strategy, we carried out two online surveys to ask customers and staff about their environmental concerns and what they felt our Strategy should focus on. We also engaged directly with customer panels to discuss our draft strategic objectives.

The feedback from the consultation was used as part of the evidence base to develop this Strategy and the associated action plan. A more detailed summary of consultation responses is available on our website.

⁷ SHIFT is a benchmarking tool and membership network for housing associations interested in sustainability

Strategy

Our vision as an organisation remains unchanged and our mission statement for this Strategy supports the overall vision and values of the organisation.

Our vision:

Improving lives Incommunities

Our environmental sustainability mission:

Delivering sustainable homes through environmentally-friendly services

We believe this captures our aim to provide high quality homes at an affordable price and that social value is at the heart of our work. We are responsible not just for improving lives in communities today, but for leaving a better world for those who follow.

Our Environmental Sustainability Strategy has three themes:

- ▶ Our homes
- ▶ Our people
- ▶ Our organisation

Our homes

Energy performance and cost in use

We have improved the energy performance of the vast majority of our housing stock through investing in double glazing, loft, cavity and external wall insulation and replacing old electric heating systems with gas central heating. We have also trialled renewable technologies including ground and air source heat pumps in a number of properties.

These improvements have increased the average energy efficiency rating of our homes to SAP 69 (Band C performance). This is ahead of the average for both the social housing sector (66) and the UK housing stock as a whole (60), however to achieve the UK target of an 80% reduction in greenhouse gas emissions, the average SAP rating of UK properties will need to increase to 86 by 2050.

Improving the energy performance of our housing stock is important to our customers: forty percent of those we surveyed stated that this should be the top priority of this Strategy.

Strategic objective: Improve the environmental performance of our homes to a minimum energy efficiency rating of E by 2020 and D by 2025¹, and achieve an average SAP rating of 73 by 2025.

We will focus our resources on helping those who live in the most energy inefficient homes and are therefore at greatest risk of fuel poverty. Our priority for investment from 2016 – 2025 is improving the energy performance of the lowest ten percent of our housing stock. In particular, we will target the small proportion of 'E' and 'F' rated properties to bring them up to a minimum 'D' rating (SAP 55 or above).

We will look to achieve this cost-effectively, through a programme of low-cost improvement works, such as loft-insulation top-ups, boiler upgrades and improvements to electric heating systems, along with more costly measures such as external or internal wall insulation and full upgrades of heating systems. Where possible, we will seek external funding to assist with the costs of these measures.

In addition, we will carry out the following activities to improve the energy performance of our wider stock:

- ▶ Install gas central heating systems to households currently on expensive electric systems
- ▶ Install cavity wall insulation to suitable properties which have not already been insulated
- ▶ Complete a cost-benefit analysis of party wall insulation with a view to installing this on selected properties

- ▶ Investigate the potential for cost-effective installations of renewable technologies including solar and heat pumps
- ▶ Top up loft insulation where this is deemed insufficient
- ▶ Review our communal heating systems and identify options for improving the energy efficiency of these.

Strategic objective: Seek to reduce service charges associated with energy costs and protect customers from rising energy prices.

The energy improvements outlined above will help reduce energy costs for more than a thousand households. However we also know that service charges can be a burden for many residents, particularly those who live in flats and sheltered schemes.

We will carry out projects to reduce the energy consumption in communal areas for a minimum of a hundred households every year. This will be achieved through projects such as:

- ▶ Replacing existing lighting with low-energy LED lighting and occupancy sensors
- ▶ Feasibility study on installing occupancy sensors for existing communal lighting
- ▶ Energy audits of sheltered schemes to identify opportunities for reducing energy usage.

Water efficiency and waste reduction

Although it sometimes feels as if it never stops raining in Yorkshire, the effects of climate change will mean that in the future water resources may be scarcer. A lot of energy goes into producing the clean water that comes out of our taps, and treating sewage waste, so being more water efficient can help save energy and reduce the carbon footprint of our homes.

UK households produce around 28 million tonnes of waste every year, of which around 45% is recycled. To be sustainable, we need to move towards a 'zero waste economy', where resources are valued and we reduce, reuse and recycle all we can.

As we are prioritising investment on improving the energy efficiency of homes, our strategy for water and waste reduction will primarily focus on joint working with other organisations to influence customer behaviour.

Strategic objective: Support customers to reduce water consumption and waste to landfill.

We will support all new customers to save water, reduce waste and recycle through provision of information in new tenancy packs.

We will help support our customers to reduce their water consumption by:

- ▶ Fitting low-flow taps and efficient shower heads in bathroom and kitchen refurbishments
- ▶ Installing dual-flush toilets
- ▶ Advising customers if they would save money through using a water meter
- ▶ Signposting customers to advice and information on water efficiency.

Waste collection and disposal is managed by Bradford Council. However, we're aware that changes to household waste collection arrangements may make it harder for customers to dispose of waste properly. We will look at cost-effective methods of supporting our customers to reduce waste through:

- ▶ Our furniture intervention project trialled reusing furniture to help customers access affordable furniture. We're now looking at partnerships with local organisations to continue this service.
- ▶ Providing information and advice to customers on reducing, reusing and recycling waste.
- ▶ Participating in national campaigns, such as Zero Waste Week.
- ▶ Discussing with the Council how we can increase recycling rates in blocks of flats.

Strategic objective: Tackle the sources of fly tipping, aiming to reduce the number of incidents year on year.

We currently take a highly proactive approach to responding to and clearing fly tipping. This comes at a significant cost both in staff time and in disposing of fly tipped waste. We will continue to take action to reduce incidents of fly tipping, through identifying the perpetrators and looking at how we can design vulnerable spaces to discourage tipping.

Green spaces and wildlife habitat

Incommunities manages a large number of green spaces including communal gardens, grassed areas, woodland areas and verges. Many of our customers ranked the preservation of habitats for plants, animals and birds as one of their top environmental concerns in our recent survey. We appreciate the role high quality green spaces can play in improving neighbourhoods and supporting native species.

We've received lots of positive comments for the wildflower meadows we've planted, including a commendation from the Ilkley Civic Society. Not only do these brighten up neighbourhoods, they also provide valuable habitat for bees and insects. Many of our customers have a love of gardening and we have some beautiful individual and communal gardens that people can be proud of.

Our strategy for green spaces will build on these achievements in a cost-effective manner.

Strategic objective: Seek cost effective opportunities to improve the quality of Incommunities' green spaces and develop wildlife habitat.

- ▶ We will look at what additional action we can take to improve the variety of wildlife habitat we already manage and ensure that our new build development includes quality green space.
- ▶ We will explore opportunities to partner with local organisations and community groups to source funding for specific projects to improve the quality of our communal areas and green spaces and encourage customers to get outdoors.
- ▶ We will signpost customers to information and advice to help customers provide wildlife habitat in their gardens.

Resilience to climate change

By 2050 Yorkshire will be getting warmer and drier. Average summer temperatures will be between 2.1°C and 2.5°C higher than now. There will be 6% less rainfall overall, but with drier summers, winter rainfall will increase by 17%.

Higher temperatures mean that vulnerable people, such as the elderly, very young or those with medical conditions may have an increased risk of heat exhaustion and heat stroke. More intense rainfall increases the risk of both flooding from rivers and surface-water flooding where drainage systems can't cope with the rapid increase in water.

As a social housing provider, we have a duty to consider the risks to our customers of a changing climate and consider appropriate mitigating actions.

Strategic objective: Assess the impact of climate change on our housing stock and customers and identify mitigation actions.

- ▶ We will carry out a flood risk assessment to identify which of our properties are at risk of fluvial (river) and surface water flooding. This will inform proposals for resilience measures and enable us to better support customers who live in affected properties.
- ▶ We will also carry out a risk assessment for overheating to identify housing types where residents may be at risk, and customer groups who may be adversely impacted by increasing temperatures. As some new build developments may be particularly susceptible to overheating, we will carry out a specific overheating risk assessment where this is considered necessary.

Our people

Tackling fuel poverty

Our areas of operation are characterised as low skill, low wage economies. Average household incomes for our customers are very low with a large proportion struggling to pay their utility bills.

Improving the physical performance of our housing stock is one way in which we are helping to tackle this problem, but we need to go further than this. We are in a position to provide advice and guidance to help customers reduce their utility bills and access relevant grants and support.

Strategic objective: Help our customers save money on utility bills through provision of advice, guidance and support.

We will provide training to all frontline staff to help them better advise customers on reducing their energy and water bills. This will include:

- ▶ Fuel poverty grants and support available
- ▶ Switching energy tariffs
- ▶ Planned programmes of energy efficiency work (e.g. insulation and gas central heating installations)
- ▶ Energy savings tips and advice.

We will look at options for providing one-to-one support and advice to tenants on energy switching and reducing utility bills, based on the success of the 'Green Doctor' pilot project.

We will also review our current voids utility arrangement to assess whether a different partnership arrangement could help customers save more on their energy bills.

Digitalisation of utilities

Digital technologies are becoming more commonplace in our homes. The move to smart meter technologies will affect everyone, but some people may struggle more than others to adapt to these changes.

The Government has set a target for all homes to have a smart meter installed by 2020. Energy suppliers are obliged to install smart gas and electricity meters along with an in-home display free of charge, but the level of support provided to help customers adapt to this new technology is likely to vary.

The move to smart meters may result in more ‘time of use’ tariffs, whereby customers can take advantage of cheaper energy prices at certain times of day.

Many of our customers will have questions relating to smart meters. Vulnerable customers may also need some additional support to help them understand and operate their in-home display and take advantage of new types of energy tariffs.

Strategic objective: Support vulnerable customers to take advantage of the switch to smart meters.

We will look at partnership opportunities (e.g. with Smart Energy GB) to help promote the smart meter roll out and recruit and train interested customers to be community champions. We will look at how best we can identify and support our vulnerable customers to make sure they are not left behind in the transition to smart technologies.

Taking action on sustainability

Although we will continue to improve the sustainability performance of our housing stock, this will only go part way to supporting customers to live more sustainably.

Our employees will be key to every part of delivering this Strategy; both in supporting our customers and helping us change working practices to reduce our environmental impact. Our recent survey showed that only 34% of staff are currently aware of the work Incommunities is doing on environmental sustainability.

In addition to the Corporate Sustainability Group we have established to lead sustainability activities across Incommunities, we will create a Staff Sustainability Forum. This will provide an opportunity for staff at all levels of the organisation to influence our sustainability work and champion sustainable work practices.

Strategic objective: Inspire our customers and staff to take action on sustainability, through education and engagement.

We will actively engage with the Community Trust Panel on sustainability issues and create an ‘interested customers’ group to get input to our environmental activities. We will look at opportunities to offer training to interested customers to help support others in their community.

We want all staff to be aware of our environmental objectives and their role in contributing to their delivery. We will provide staff with training and briefings on sustainability in the workplace and carry out an assessment of specific training needs associated with different roles.

We will encourage green commuting behaviours through promotion of the cycle to work scheme, discount travel cards for public transport and staff engagement activities.

Our organisation

Reducing our environmental impact

Improving our environmental performance not only has a sustainability benefit but can result in significant financial savings for the organisation. In our consultation work both customers and staff felt we should be taking action to reduce our environmental impact as an organisation with waste and recycling highlighted as a specific concern.

We are already taking steps to actively reduce our environmental impact. All of our office waste from The Quays is either recycled or goes to an energy-from-waste plant. We're installing LED lighting in our office accommodation which uses less energy and requires less maintenance. All drivers of our fleet vehicles get trained on fuel-efficient driving behaviour and have tracking devices in their vehicles which report on performance. However, we believe there is more we can do to become more resource efficient and reduce the cost of delivering our services.

Strategic objective: Reduce Incommunities' carbon footprint by 10% by 2025.

As a responsible business, we have a duty to strive to reduce our environmental impact as far as possible. A 10% reduction in our current carbon footprint by 2025 would put us on track to meeting the targets of the Climate Change Act. Reducing our carbon footprint will also result in significant financial savings for the organisation.

We will achieve this reduction by:

- ▶ Reducing electricity consumption at The Quays by replacing current lighting systems with LED light, installing occupancy sensors and encouraging energy-efficient behaviours
- ▶ Reducing emissions associated with our fleet vehicles through reviewing fleet allocation to maximise fuel efficiency, encouraging fuel-efficient driving behaviours and trialling the use of ultra-low emission vehicles
- ▶ Reducing business mileage through smarter working and trialling pool vehicles for staff use
- ▶ Cutting the overall amount of waste we dispose of and the waste we specifically send to landfill by 40%
- ▶ Trialling food waste collection facilities at The Quays.

Legislative and regulatory compliance

In 2016 we identified all environmental and waste regulations that apply to our work and created an Environmental Regulations Register. We also have a Site Waste Management Policy in place, which was reviewed in 2015. However, we recognise the need to develop a more rigorous approach to ensuring compliance with regulations and providing staff with training and support to meet these requirements.

Strategic objective: Document and demonstrate compliance with all relevant environmental legislation.

We will conduct a high level audit of current practices in relation to each aspect of environmental legislation highlighted in our Environmental Regulations Register. This will inform a more detailed audit of specific procedures, primarily around waste management, to inform an update of the Site Waste Management Policy.

We will put in place a programme of measures to document compliance with legislation through staff training and internal audits, including an annual review of compliance with existing and any new legislation.

Procurement

Although we deliver the majority of our services in-house, specialist work and construction of new build homes is delivered by contractors. The environmental impact of our service delivery is also influenced by the products and supplies we buy. We will seek to reduce our environmental impact in this area through working with contractors and suppliers to source more sustainable supplies and ensure the principles of our Environmental Sustainability Policy are adhered to by those working on our behalf.

Strategic objective: Require procurement of contracts to take into consideration environmental issues.

We will revise our procurement procedures to require that contracts above a certain value include consideration of environmental issues such as sustainable sourcing of materials and waste minimisation. We will engage with contractors to make sure they are aware of Incommunities' Environmental Sustainability Policy and their role in helping us achieve our sustainability objectives.

Strategic objective: Identify opportunities to increase the proportion of supplies that are sustainably sourced whilst retaining a value for money approach.

We will investigate opportunities to source products that come from sustainable sources both for our office supplies and for supplies used for the maintenance and refurbishment of homes.

We will explore how more sustainable alternatives to traditional construction products can be incorporated into our new build homes and investigate how we can reduce embodied carbon emissions of our new homes.

Value for money

Value For Money (VFM) is at the heart of everything Incommunities does. This Strategy contributes towards achieving an optimum balance between economy, efficiency and effectiveness through the following:

- ▶ Cost effective investments to improve the energy efficiency of housing stock, resulting in lower energy bills for customers and more viable tenancies
- ▶ Improving provision of advice and support to customers through staff training and customer engagement activities
- ▶ Taking advantage of available external funding to contribute towards the cost of domestic energy efficiency improvements, fuel poverty services and improvements to our green spaces, enabling us to deliver more value for less money
- ▶ Taking steps to become more resource-efficient in delivering our services to make savings on energy bills, waste disposal and transport costs.

The actions identified to achieve our environmental sustainability objectives will be assessed based on the cost of implementation vs benefits to both the organisation and our customers.

Reporting and review

The past few years have seen significant change in government policies for both the housing and environmental sectors. This turbulence is likely to continue for the foreseeable future. We need to be flexible to continue operating in this uncertain world and take advantage of opportunities for funding and support that will help deliver our environmental objectives.

This Strategy provides a roadmap for our environmental sustainability work through to 2025. Although our vision and mission will remain the same, our path to achieving these may change, and our strategic objectives will need reviewing.

Strategic objective: Update Incommunities' carbon footprint and publicly report on progress against the Environmental Sustainability Strategy objectives annually

We will report annually on progress made on delivering our environmental sustainability objectives and update our carbon footprint. We will carry out a review and update of the Strategy in 2020 to take account of policy and technological change and to retain our commitment to continuous improvement.

We will share our progress in implementing our strategy with customers through our newsletter and scrutiny arrangements.

Strategic objective: Aim to achieve SHIFT Gold award by 2020.

We have recently joined the SHIFT (Sustainable Homes Index for Tomorrow) network of housing associations and undertaken a benchmarking exercise to determine our current performance in relation to our peers. We will look to continue this assessment in future as a measure of our improvement in environmental sustainability work.