



# All Possible Action

A SUSTAINABILITY STRATEGY  
FOR COASTAL HOUSING

Version 1.0 October 2022

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# Chair's Preface

On behalf of Coastal's Board, I can say that we are proud to introduce this strategy which will ensure that Coastal remains a value-led and innovative organisation as we seek to transform how Coastal works now and in the future. As board members, we are custodians of the future for both Coastal and the communities we serve and supporting this sustainability strategy underlines our long-term, planet-wide responsibility.



The proposed changes in how Coastal will function in the future are significant and will challenge our staff to put the environment first in all aspects of our work. This strategy document is just the starting point; it sets out what we intend to do and how we aim to do it. But, the extent of the change we need will not happen quickly and we will view the challenges presented as opportunities to learn. We will share that learning outside of Coastal so that we can help others while remaining accountable to all of our stakeholders.

The consequences of not taking action are dire, but I end my foreword with a note of optimism. If we act together now, we can ensure that those who come after us can thrive. There can be no better motivation than that.

Alun Williams

*Chair*

July 2022

# CEO's Preface

In 2021, scientists announced that humanity had less than a decade left to fundamentally change its ways and drastically reduce greenhouse gas emissions if it wants to avoid passing disastrous climate change 'tipping points'. The average temperature of the Earth has already increased by at least 1.2°C and the consequences are visible now. Forest fires resulting from long dry spells are a frequent occurrence throughout the world. Coral reefs are dying at an accelerating pace, and average summer temperatures are risking the health and survival of many in our societies.



This is a pivotal time for our planet. Coastal has always sought to do the right thing; now we are seeking to do the most important thing of all – to protect our shared future. It is imperative that every organisation and individual take action to avoid the worst consequences of climate chaos. Despite having a proud history of undertaking sustainable initiatives and projects, the twin crises of biodiversity collapse and climate change mean that Coastal needs to fundamentally change how it operates, reducing its greenhouse gas emissions, protecting wildlife and encouraging and supporting residents to do the same. This strategy document is our statement of intent.

Debbie Green  
*Chief Executive*  
July 2022

# 1. Introduction

This strategy represents a major commitment from Coastal to be open and accountable in taking action to help to address human-made crises which threaten the lives of future generations – crises of climate change and biodiversity loss. This strategy details the steps Coastal will take and the evidence we will gather to prove what we are doing.

It is one thing to record the data for these measures every year, but this means nothing if it does not lead to improvements. So, Coastal is embarking on an exercise which will alter its entire way of working. Beginning with the publication of this strategy, Coastal will from now on issue yearly reports detailing the progress made against the measures included here. By making these reports public, we hope that residents, stakeholders and indeed members of the public will hold us to account by interrogating our reports and sharing their knowledge of how we can improve, as well as what more or different Coastal should be doing. The measures we are committing to report are set out in this strategy document.

Ultimately, we are trying to change the entire working culture at Coastal. We are empowering staff to make sustainable choices which affect their own work, because they are the people who know what, and how, to change. This is set out in our guiding principles in the next section. This strategy document also includes the key risks to us achieving our ambitions that we have identified and how we will deal with them.

Of course, we welcome feedback, opinions and suggestions and this strategy is no exception. If you would like to share your thoughts with us about any aspect of this strategy, please do contact us using the contact details on the back page of this document.

# 2. Principles

Our vision:

*Ensuring Coastal takes **all possible action** to manage the climate crisis to enable the wellbeing and existence of future generations.*

We will:

- Take responsibility, individually and collectively, for the impact we have on the environment and seek ways to limit it
- Ensure that making sustainable choices is embedded in everything we do at Coastal
- Empower and trust staff to use their initiative to make choices which protect or benefit our environment, without having to wait for approval from above
- Encourage residents to do what is right by working with them collaboratively, whilst Coastal continues to deliver what matters to residents
- Work openly and collaboratively with partners to improve our environmental sustainability
- Use our procurement to influence industry by purchasing responsibly and selecting suppliers who match our values and ambition
- Tackle biodiversity decline by using our land and property in ways that benefit wildlife
- Offset our carbon emissions with an ambitious programme of tree planting on our land
- Select key measures (listed in this document) to measure progress using reliable data as we seek to improve year on year
- Publish our sustainability progress in annual reports.

# 3. Specific strategy areas

Whilst some of these areas will be reflected in the measures outlined above, the details set out in this section will relate to specific areas of sustainability with relevance across all of Coastal. The guidelines set out in these specific areas will underpin all decisions made at Coastal, through procurement, commissioning, use and disposal. Where measures correspond to points in these specific areas, they are noted. These specific areas are also the starting points to developing processes which would evidence performance of this strategy to BS ISO:14001 level.

## 3.1

### Energy efficiency

Reducing energy use across all of Coastal's operations is arguably the biggest action to be taken towards reducing carbon emissions. Energy generation is the single biggest source of the UK's greenhouse gas emissions.

Coastal will:

- Ensure that all of our properties are as energy efficient as possible, upgrading to energy efficient heating options, better performing windows, and retrofitting insulation where possible. This is above and beyond WHQS requirements and pending any major future decarbonisation retrofit works. Coastal will ensure that its maintenance inspectors work to PAS:2035 and are qualified Domestic Energy Assessors where possible. (MA1, MA2)
- Purchasing energy efficient equipment, for example for IT systems. (FE1, IT1)
- Minimise outsourced energy use from datacentres and web pages to account for Coastal's entire energy demand, initially seeking to minimise datacentre energy use by 10% over 5 years. (IT1)
- Coastal will ensure that our offices are as energy efficient as possible, using low energy lighting, efficient heating systems and phasing out kettles. (FE1)
- There is a risk that energy use will increase as we increase the number of electric vehicles in Coastal's fleet. Whilst this is still preferable to fossil-fuelled vehicles, we will seek to reduce energy use from transport by rationalising van allocation and ensuring works are carried out over as short a distance as possible, bearing in mind operative location and domicile. (FM1, FM4, FM6)
- Where verifiable data is obtainable, it will be recorded and added as a measure to this strategy, so that it may be reported upon and lead to future improvements.
- Procure energy from 'green' suppliers and tariffs. Energy use is unavoidable, therefore it is crucial to ensure that what energy is used has as small an impact on the environment as possible. Using our procurement power in this way also helps to influence industry and set an example to the wider world. (FE1)

## 3.2

### Adaptation to climate change

As the climate changes, the way we are used to living will have to fundamentally change. Whilst the focus of this strategy is still upon carbon reduction and mitigating climate change, the average temperature of the Earth has already increased by 1.2°C, leading to more frequent extreme weather events, fires and floods. Coastal homes which will be upgraded to be cheaper to heat may consequentially be at risk of being too hot in the summer. This jeopardises residents' comfort and even health. Principal risks in Wales include flash flooding and overheating.

Coastal will:

- Continue our ambitious tree planting and afforestation works in order to help deal with surface water run-off at times of heavy rain. This reduces flooding risk. (ES6, DV3)
- Work with local authority planning officers to ensure that sustainable drainage systems (SuDS) placed on new sites are effective and seek to install SuDS and swales on existing sites where flooding is a risk. This will mean that Coastal's properties are able to deal with excess water before it becomes a problem. (DV4)
- Monitor the risk of fluvial (river) and marine (sea) flooding which will inform decisions about how we deal with properties which become at risk during future flood events. An asset management strategy will be developed to address this issue.
- Where existing homes are at risk of overheating, Coastal will seek to plant trees to provide shade to protect residents' windows from the summer sun. This has the double dividend of enhancing biodiversity and carbon capture whilst preventing excessive solar gain in homes. Where this is not possible, Coastal will liaise with the relevant planning authorities to retrofit alternatives such as ventilation systems or brises soleil. (ES6, DV4)
- Coastal will seek to create green spaces in urban environments in order to minimise the 'urban heat island effect', whereby urban areas overheat because of the action of strong sunlight on concrete. (ES2, ES3, ES5, ES6)
- Coastal will explore the options of installing green roofs on existing and new developments. The growing matter on a green roof stores water during a sharp downpour, preventing urban drainage becoming overwhelmed and the resulting flash flooding. (ES5, DV4)
- Coastal will also seek to take advantage of future increased sunlight by installing micro-generation technology at its developments. This will reduce energy costs for tenants in the summer when mechanical cooling may become a necessity. (MA1, MA2)

## 3.3

### Sustainable materials and increasing the use of responsibly sourced materials used for all building works

The built environment, including construction and existing dwellings, accounts for more than 40% of the UK's greenhouse gas emissions. The industry has a choice of construction materials, from those which have very high associated emissions (concrete) to those which actually trap carbon within them (wood). Other factors such as production methods and transportation can increase the carbon footprint of construction materials.

Coastal will:

- Continue our active membership of Wood Knowledge Wales, sharing and receiving learning about how to increase the use of Welsh timber in construction by developing the supply chain and using innovative methods of construction. (DV2, DV6)
- Work with our contractors to encourage procurement of locally sourced materials wherever possible; for example, steel from Tata's Port Talbot plant, timber from Welsh forests and components from Welsh manufacturers. Coastal is involved with Tata steel to develop sustainable steel. (DV6)
- Encourage and train staff involved in new builds and refurbishment to learn about low-carbon building techniques and to put their knowledge into practice in their jobs. Many courses are available from our partners and networks, although specialist courses can be paid for where they would be of particular use. (MA1, MA4)
- Coastal's operatives will consider the whole-life impacts of materials, not overlooking what could be done with them at the end of their useful lives. Materials which can be re-used will be prioritised, followed by those which can be recycled, with other materials used only as a last resort. As this will be impossible to measure effectively, staff will be trusted to exercise their judgement. (MA4, DV6)
- Review the sustainability policies and statements of all suppliers, for example of kitchen and bathroom installations, in order to ensure that Coastal's procurement has a positive effect on industry. (DV6, MA4)

## 3.4

### Water efficiency

Although Coastal does not operate in areas currently understood to be water stressed, it does recognise that in future, hotter, drier summers as a result of climate change may be the norm, risking hosepipe bans and increased bills. Therefore, Coastal commits to prepare for this eventuality by seeking to reduce water usage. Additionally, water treatment and transportation has an energy demand and associated carbon footprint, from purifying drinking water to pumping it to where it is needed. Reducing water need will also reduce carbon emissions.



Coastal will:

- Encourage rainwater use by installing water butts for use by its estates teams. Water butts may also be installed for use by residents in communal gardens or where they cannot be provided at individual tenants' homes. (ES7)
- Review our new-build specification and seek to improve water use to 100 litres per resident per day. This will mean going beyond building regulations by encouraging showers and installing low-flow shower heads, discouraging baths and ensuring that all taps installed or replaced in bathrooms are aerating. (DV1)
- Only install dual-flush toilets. (DV1, MA4)
- Commit to exploring the potential for rainwater and greywater harvesting at future developments and monitor the market for suitable retrofit products, appreciating that for the foreseeable future the priority is decarbonisation

## 3.5

### Waste management

As well as the obvious problems of landfill space and future land management of landfill sites, buried waste is a major source of methane gas emissions. Additionally, greenhouse gas emissions can be associated with the production of all new materials, so it is important that society makes a shift away from burying useful resources in the ground.

Coastal will:

- Ensure that all new-build homes have enough internal bin space to enable residents to separate waste. In flats, kitchens may include compartmentalised drawers for waste separation. Residents will be supported to use the recycling services offered by local authorities. (HM1)
- Select waste contractors to dispose of our commercial and business waste who are able accredited to ensure that as much as possible is recycled. Coastal will work with those contractors to receive reports of amounts of material recycled. (MA3, FA3)
- Where furniture or other items are found abandoned and in useable condition, Coastal will seek to store those items for use by tenants in need or other members of the community. (HM1)
- Leave items abandoned at end of tenancy for incoming tenants to decide upon. Where items such as carpets, curtains and furniture) are abandoned in homes, prospective tenants will be allowed to view the premises prior to any void work taking place (assuming that the property is presentable). (HM1)
- Seek to recycle leftover paints used by its decorating team. (MA3, MA4)
- Compost green waste from estates in-situ to be used on Coastal's land or distributed to residents where surpluses occur. (ES4)

## 3.6

### Fly-tipping

Every year, Coastal experiences numerous fly-tipping incidents. Reasons for fly-tipping range from difficulty transporting items to costs for the disposal of commercial waste. Fly-tipped waste can also contain hazardous materials such as high VOC products and asbestos. It is therefore crucial that fly-tipping is dealt with responsibly.

Coastal will:

- Establish job codes to identify fly-tipping incidents in its maintenance records. (MA5)
- Map areas to establish areas experiencing high incidences of fly-tipping. (MA5)
- Ensure that fly-tipped waste is disposed of responsibly. Waste hauliers will be selected for their ability to deal with the types of waste present as well as their capacity to see to it that as much of the waste as possible is recycled. (MA3)
- Consider installing CCTV or using other natural surveillance methods to deter future incidents where areas are prone to fly-tipping. (MA5)
- Work with the police to ensure that fly-tippers are prosecuted where they can be identified. Coastal will also continue to part-fund the Waste Officer at Neath Port Talbot Council. (MA5)

## 3.7

### Ecology

The biodiversity crisis runs parallel to the climate crisis, and the two are inextricably linked. The UK has been cited as being one of the most nature-depleted countries on Earth, with only about half of its natural diversity remaining since the industrial revolution. As a significant landowner in South Wales, Coastal is determined to play its part in tackling the biodiversity crisis.

Coastal will:

- Encourage and support our estates teams to reduce mowing of grassed areas and maintain areas where no mowing takes place at all. This provides habitat and food sources for invertebrates and small mammals. (ES2)
- Engage with residents to foster understanding and acceptance of changes to the way Coastal manages its estates. (ES2)
- Encourage and support its estates teams to create and maintain wildflower areas on estates in order to provide food and habitat for pollinators, birds and other wildlife. Coastal is prepared to pay for wildflower seed but will work with partners to plan the most effective ways to support biodiversity on our land. (ES3)
- Seek to incorporate green infrastructure into its sites where this is feasible; going beyond swales and SuDS to looking at green walls and roofs on new and existing buildings. (ES5, DV4)

- Continue to plant trees on existing land and new developments. We will pledge to plant three trees for every one we fell in creating new homes. (DV3, ES6)
- Consider the local environment in deciding what tree species to plant where. For example, hazel trees could be planted where dormice are present. (DV3, ES6)

## 3.8

### Green transport

Transport and car use is a major source of greenhouse gas emissions. Over the last century, society has become increasingly used to the convenience of personal transport and foreign holidays. These are jeopardised by the need to take environmentally responsible lifestyle changes. However, given the dispersed nature of modern family life and the decentralised planning of our towns, it is likely that some forms of personal transport, and business transport, will always be needed.

Coastal will:

- Install electric vehicle charge points or outside plug sockets at all new houses. At blocks of flats, we will seek to install pay-as-you go chargers so that residents can conveniently charge their electric vehicles close to home in future. We will begin this ambitious roll-out immediately, so that our properties are ready for residents who make the move to electrified transport sooner. (FA1, MA1)
- Seek to install public charge points at its commercial premises, where off-road parking is provided. The switch to electrified transport can only happen if charging is as convenient as it can be for everyone. (FA1, MA1)
- Provide local public transport information to all incoming tenants. Being made aware of local transport links is crucial to encouraging uptake. (HM1)
- Seek to electrify as many of Coastal's own vehicles as possible, as quickly as possible. Coastal leases its vehicles and so every three years there is the opportunity for any given vehicle to be switched. (FA6)
- Review our mileage and expenses procedures and payments so that staff are incentivised to use public transport for any work travel. Coastal's headquarters are located within 100m of a railway station and on a major bus route. (FA1, FE4)
- Continue to offer staff the benefit of the Cycle To Work Scheme, a salary sacrifice option which allows staff to buy a quality bicycle for less money. (FM1, FE4)
- Coastal will also seek to rationalise its fleet where vehicles are used by a single operative and stationary for most of the time. Coastal will also examine its logistics to ensure mileage covered by operatives and staff is minimised when moving between sites, helping to reduce emissions as well as fuel costs.

## 3.9

### Resident engagement

Climate change will affect almost every aspect of our lives and necessitate change. As we seek to decarbonise our housing stock and change the way Coastal operates in future, it is crucial that residents understand why we do what we will do.

Coastal will:

- Set out and seek to continuously improve upon a stakeholder engagement plan which includes residents as a key stakeholder group (appendix 4). (HM1, CO1)
- Create a sustainability communication plan to accompany the stakeholder engagement plan, which details how we will engage with tenants to prepare them for the changes to come. Coastal recognises that not all tenants have access to the internet, therefore the operation of the communications plan is key to the success of this sustainability strategy (appendix 3). (CO1)
- Identify resident champions through resident surveys and invite them to working groups with key Coastal staff. These residents will use lived experience to hold Coastal to account and influence the development of this sustainability strategy. (HM1)
- Instigate a habit of 'Coastal conversations' amongst all staff. Coastal's staff work on sites every day and carry out thousands of repair jobs every year. A golden thread throughout this strategy has been the empowerment and agency of staff, therefore staff who work face-to-face with residents will have tremendous influence in engaging residents. This strategy seeks to foster an environmentally aware culture amongst Coastal's staff and the enthusiasm of this staff will spark the important conversations. (CO1, HM1, HR1)
- Prepare residents early. Where retrofit and decarbonisation works are planned, Coastal will begin consultation at as early a stage as possible so that residents are prepared for the forthcoming changes to their homes, what they will need to do differently, and how work will be carried out. We will also work with residents post-works for a 'soft landings' style approach. (HM1)

## 3.10

### Pollutants

Coastal is aware of the potential harm which can be caused by materials and products it uses every day. Pollutants include, but are not limited to: mould, water pipes containing lead, diesel spills, disposal of paints. Other harmful substances such as asbestos may also be present in Coastal's older buildings. Dealing with such pollutants safely is to protect people and the environment from avoidable harm.

Coastal will:

- Cease the use of glyphosate weed killer, as well as other harmful pesticides, in order to avoid harm to wildlife and members of the community. (ES8)

- Avoid the use of harmful chemical fertilizers, instead opting to use compost made on-site from Coastal's own green waste. (ES4)
- Support residents to better use and ventilate their homes where complaints of damp and mould are received. Coastal will work to ensure that future mould growth is mitigated and, where problems with the homes themselves are identified, seek to rectify the situation before damage to the building fabric or the residents' health occurs. (HM1, MA1)
- Encourage decorating operatives to use a minimal paint palette, so that paint which is not used on one site can be used on another. This will reduce waste. (MA3, MA4)
- Encourage decorating operatives to use paint recycling facilities where these are offered, for example through local authorities or the paint manufacturer. Coastal will also seek to use recycled paint where this is available. (MA3, MA4)
- Minimise the use of fossil fuels with a view to phasing them out altogether from its business fleet. This reduces the risk of spills as well as avoiding the associated greenhouse emissions. (FM6)
- Phase out and eliminate petrol-powered tools from its estates team equipment. This reduces the risk of spilled fuel as well as the associated greenhouse gas emissions. (ES?)
- Select waste contractors and cleaning firms who are accredited and competent to deal with hazardous materials. Coastal will ensure that their methods and accreditation remains valid on an annual basis. (MA3, MA5)
- Eliminate harmful chemicals from its offices, including bleach-based cleaning fluids. (FM2)

# 4. Key Measures

This section of the report lays out the most important measures which will form the basis of our annual reporting. Managers in each named department will be responsible for collecting the data needed to evidence progress on the measures allocated to them. By enforcing the reporting of these measures and aiming for continuous improvement, the owners of these measures will help to cascade sustainable performance and decision making throughout all levels of the organisation.

In the future, as this strategy is rolled out and developed, Coastal hopes to develop a set of measures which will apply to every member of staff. This will further embed the culture change we need, organisation wide.

Business Area	Measure ID	Measure	Definition	Report Data	Owner
4.1 Housing	M1	Resident engagement	A more detailed resident engagement statement forms part of this strategy (5.9), however Coastal realises its role not just as a provider of accommodation but as an influencer of behaviour as a social landlord. We will work with residents to promote more sustainable decision making and lifestyle choices.	Case studies; reports on activities and initiatives.	Head of Community Housing

Business Area	Measure ID	Measure	Definition	Report Data	Owner
4.2 Estates	ES1	Materials gifted onwards	Coastal's estates team is embedded in the communities it serves. In the past, surplus materials such as patio tiles, AstroTurf and wood chippings have been gifted on to community groups. Coastal wants this work to continue.	Case studies; number of 'gifts' and types of material gifted.	Head of Maintenance
	ES2	No-mow areas maintained	Since 2018, Coastal's estates team has been leaving areas of grass unmown in order to preserve habitat for wildlife. Whilst measuring a square meter coverage of no-mow areas is not possible, we can provide a count of such areas.	Number of no-mow areas.	Head of Maintenance
	ES3	Wildflower areas maintained.	Every year, Coastal's estates team buys many kilogrammes of wildflower seed to create refuges for pollinating insects. Whilst measuring a square meter coverage of no-mow areas is not possible, we can provide a count of such areas.	Number of wildflower areas.	Head of Maintenance
	ES4	Tonnes of compost created.	Coastal's estates team creates a lot of green waste each year from mowing, pruning and weeding. Rather than send this to landfill, Coastal's estates team composts this green waste for use on site.	Tonnes of compost created.	Head of Maintenance

Business Area	Measure ID	Measure	Definition	Report Data	Owner
4.2 Estates	ES5	Winter projects reports.	Between each growing season, Coastal's estates team carries out projects to upgrade sites or create new landscaped areas. These projects normally include bird box and hedgehog house installation as well as other wildlife-supporting features.	Case studies; number of wildlife homes created.	Head of Maintenance
	ES6	Trees planted.	Coastal has already planted many hundreds of trees on its land, however the numbers have never been reported. Recognising that space for tree planting is finite, in future we will report on the number of trees planted per year.	Number of trees planted.	Head of Maintenance
	ES7	Rainwater use.	Coastal's estates team already use water butts to collect rain water for use on their sites. In future, we shall count the number of water butts in use and hopefully, increase them.	Number of water butts.	Head of Maintenance
	ES8	Glyphosate reduction.	Since 2018, Coastal has been determined to eliminate glyphosate weed killer due to its harmful effects on wildlife. We will report on its reduction and eventual elimination.	Number of litres of glyphosate weed killer purchased, litres of other weed killer purchased.	Head of Maintenance
	ES9	Electrification of tools.	Fossil fuels have long been the most convenient means of powering estate maintenance tools such as leaf-blowers, lawn mowers and strimmer's. This comes with CO2 emissions, noise and the risk of fuel spillage. A move to rechargeable electric equipment mitigates all of these issues, but can reduce convenience and efficiency for operatives.	Number of electrical tools in use, percentage of total.	Head of Maintenance

Business Area	Measure ID	Measure	Definition	Report Data	Owner
4.3 Human Resources	HR1	Carbon literacy training.	Culture change at Coastal begins with a shared sense of purpose and urgency for change. By providing all staff with carbon literacy training, we will embed the principles of this strategy across all levels and areas of Coastal's operations.	Number of staff trained, percentage of staff trained.	Head of HR

Business Area	Measure ID	Measure	Definition	Report Data	Owner
4.3 Facilities Management	FM1	EV charge points installed.	As transport becomes electrified, EV charging will need to be available to all.	Number of EV charge points installed, total points available.	Head of Facilities
	FM2	Percentage of office supplies responsibly sourced	We will request this data from our suppliers. It will guide future product choices.	Percentage responsibly sourced.	Head of Facilities
	FM3	Percentage of office waste recycled	We will work with our waste contractors to establish and improve upon our business waste which is recycled.	Percentage of office waste recycled, previous years' data used for comparators.	Head of Facilities
	FM4	Tonnes of CO2 emitted by business fleet.	We will calculate how much CO2 is emitted from our vehicles by using the CO2 emissions stated on their DVLA V5c documents and tracking the miles they cover.	Tonnes of CO2 from business fleet.	Head of Facilities
	FM5	Water use at all offices.	If hotter, drier summers become the norm, water cost and availability may become problematic, even in Wales. Coastal will make efforts to reduce water use.	Water used, average per employee.	Head of Facilities
	FM6	Percentage of fleet electrified	As the world switches away from fossil fuels as its main source of energy, so transport will have to adapt to a lower carbon world. Coastal has been gradually increasing the numbers of electric vehicles in its fleet for some years, and we will continue to do so as the end of the internal combustion engine draws closer.	Number of electric vehicles, percentage of fleet.	Head of Facilities



Business Area	Measure ID	Measure	Definition	Report Data	Owner
4.4 Finance	FE1	Scope 1 Emissions	Working with an external partner, Coastal will calculate its direct carbon emissions related to its business activity.	Tonnes of CO2, tracked annually from energy bills, business mileage and staff commuting.	Research Manager
	FE2	Scope 2 Emissions	Working with an external partner, Coastal will publish data on any indirect emissions, where applicable.	Tonnes of CO2, tracked annually	Research Manager
	FE3	Scope 3 Emissions	Working with external partners, Coastal will use best endeavours to calculate CO2 emissions produced by its supply chains and associated activities.	Tonnes of CO2, tracked annually	Research Manager
	FE4	CO2 from business mileage.	We will change our mileage and expenses claim forms to detail whether staff vehicles are diesel or petrol, then estimate a total CO2 footprint based upon UK average figures. We will also look in future to recording this data using emissions noted on individual vehicles' V5c documents.	Tonnes of CO2.	Head of Finance

Business Area	Measure ID	Measure	Definition	Report Data	Owner
4.5 Tech	IT1	Datacentre energy demand	Outsourced electricity use has increased with Coastal's move to cloud-hosted IT systems. The datacentres in which Coastal's servers are housed consume huge amounts of energy. Coastal will seek to reduce the power used by its data storage and website by 10% over 5 years.	Amps of power used by Coastal's hosted data	Head of IT

Business Area	Measure ID	Measure	Definition	Report Data	Owner
4.6 Development	DV1	Average EPC/SAP rating of properties completed in previous 12 months.	It should be easiest to make new homes more energy efficient. Publishing data on new homes is a good way to evidence how well Coastal's new homes perform.	Average EPC and SAP score for properties completed in 12 months to last report, previous years' scores as comparators.	Head of Development
	DV2	Number of homes completed to near-zero emissions.	Development will report annually on the number of near-zero emissions homes delivered; specifically innovative homes going above and beyond current building regulations.	Numbers of homes, case studies.	Head of Development
	DV3	Trees planted.	Trees are crucial for carbon capture and flood mitigation. Therefore it is important to plant trees where possible, and the development department has pledged to plant three trees for every one felled.	Number of trees planted.	Head of Development
	DV4	Flood risk.	Development will install flood mitigation methods on new developments, including swales, SUDs and soft landscaped areas. Sustainable methods of drainage will be included on all schemes.	Statements, case studies.	Head of Development
	DV5	Re-use of construction materials.	The Social Value Manager will work with contractors to identify excess materials on new development sites which can be passed on for reuse within the Group.	Case studies, number of incidents and types of materials.	Social Value Manager
	DV6	Carbon Emissions from Construction	Coastal recognises the significant carbon emissions associated with construction. We will work with our contractors to measure these Scope 3 emissions with a view to reducing them through contractor and material choice, Modern Methods of Construction and supply chains.	Tonnes	Head of Development

Business Area	Measure ID	Measure	Definition	Report Data	Owner
4.7 Maintenance	MA1	Operatives trained in sustainable technologies	Maintenance will report the number of operatives trained in heat pump installation, solar PV installation etc. in order to address skills shortages, reduce costs and avoid errors.	Operatives able to install / maintain heat pumps, operatives able to install / maintain solar PV; compared to previous years' totals.	Head of Maintenance
	MA2	Coastal's Stock Average EPC/SAP Score	The more efficient a home is, the less it costs to heat. The less it costs to heat, the less energy is used to heat it. Raising homes' SAP scores is a good way to prove energy efficiency gains.	Coastal's average EPC and SAP score, previous years' scores as comparators.	Head of Maintenance
	MA3	Percentage of maintenance waste recycled	We will work with our waste contractors to establish and improve upon our business waste which is recycled.	Percentage of waste recycled, previous years' data used for comparators.	Head of Maintenance
	MA4	Percentage of maintenance materials responsibly source	We will request this data from our suppliers, as well as monitoring their own sustainability statements, in order to judge how sustainable our supply chain is. It will guide future product choices.	Percentage responsibly sourced.	Head of Maintenance
	MA5	Fly-tipping incidents per year.	Fly tipping poses risks to health and safety and is unsightly. Coastal will create codes to identify fly-tipping incidents from its management systems. Tipped waste will be recycled as much as possible.	Number of incidents, percentage recycled.	Head of Maintenance

Business Area	Measure ID	Measure	Definition	Report Data	Owner
4.8 Communications	CO1	Proportion of residents reached by Coastal's sustainability messaging.	Leadership is a crucial factor in the shift towards sustainability. Good communications are obviously key to this, so communications colleagues will examine web traffic, social media reach and other means to estimate how many residents are engaging with Coastal's messaging.	Number or percentage of residents.	PR & Comms Manager

# 5. Key Risks

Risk	Definition	Mitigation	Source	Severity	Likelihood
<b>Inertia</b>	Coastal fails to act to improve its sustainability performance; nothing changes	The publication of this strategy is the first step toward addressing this. By publishing an annual report based on actual data, Coastal will become more transparent and open itself to interrogation by its stakeholders. This will encourage the improvement we need.	Internal		
<b>Embedding Across all Coastal</b>	Sustainable cultures and ways of working fail to take root at all levels across the organisation.	The publication of this strategy will help mitigate this risk by codifying what is expected of staff and affirming their individual agency and decision-making capabilities. Leadership is crucial, and sustainability will become a standing item on all management team meeting agendas.	Internal		
<b>Liability</b>	Data retrieved as part of sustainability efforts reveals hazards or breaches which are damaging to Coastal.	Humidity sensors in homes may reveal damp problems or pollution sensors may reveal poor air quality in homes. Where this is the case, Coastal will act swiftly to rectify problems which already existed and mitigate any damage to residents' health and property before liability arises. Coastal will always be led by data.	Internal		
<b>Business Priority Clashes</b>	Every major sustainability project will require resource and business operations shift. This may affect sustainability effort.	Every project will be accompanied by a business case presented to management team. Sustainability will be added as a standing item to management team meeting agendas, maintaining visibility of projects and ensuring that they remain relevant and in the minds of Coastal's leaders.	Internal		
<b>Cost</b>	Coastal's budgets do not allow it to afford to do all it would like to do to tackle climate change.	It is believed that the most effect can be had by making better choices. Coastal is an organisation with an annual turnover exceeding £35m, therefore its procurement and operations are the first area to examine when seeking greater environmental sustainability. Coastal's staff will also be encouraged to be mindful and look for funding opportunities where grant availability will help make change happen.	Internal		
<b>Competition for Budgets</b>	Coastal's core expenditure areas are servicing loan repayments, staff wages and maintaining properties. Each is in competition with the other for budget allocation.	As above, a culture change within Coastal will help to address this concern. Individuals at all levels of the organisation will be encouraged to make better choices and to feed ideas upwards to leaders. A lot can be done within existing budget allocations. In future, business cases for costly projects will be presented to senior management team before annual budgets are set, so that each project can be considered on its merits and its potential impact across Coastal.	Internal		

Risk	Definition	Mitigation	Source	Severity	Likelihood
<b>Data Collection Limits</b>	Some data is tangible such as tonnes of waste recycled or business miles driven. Some data is hard to gage, such as resident enjoyment or staff awareness of sustainability.	Where possible, this strategy will focus upon verifiable data which Coastal considers meaningful and which can be evidenced to stakeholders who would ask for this. However, some intangible or qualitative data may be crucial. This data will be gathered from resident surveys or focus groups and analysed in a robust way, so that this data can be useful to Coastal. Less tangible data impacts can be illustrated via case studies included in annual reports.	Internal		
<b>Workloads and Staff Time</b>	Staff only have so many hours a week to complete their main tasks and so their 'day job' crowds out sustainability work. Conversely, some staff may prioritise sustainability projects over their core tasks.	Staff agency and initiative are crucial factors for the success of this strategy and to effect change across Coastal. Coastal believes that its staff, who work their jobs every day of the week, are best placed to make decisions and adapt their work accordingly. However, staff will never be discouraged from asking for help or guidance where this is needed. Leaders within the organisation will be expected to appreciate the shift in culture that the climate emergency requires and empower staff to act accordingly.	Internal		
<b>Adverse Impacts on Residents</b>	Similarly to 'Getting it Wrong' above, some works will require making residents' homes perhaps less convenient (e.g. heat pump installation) or even damage to resident property where damp becomes an issue.	Residents are Coastal's single most important stakeholder group. Coastal will implement robust resident consultation procedures (see 5.9 below) which will ensure that residents understand the need for change. Coastal will support residents so that people are able to change the way use their homes are used, minimising the risk of dampness, cold or overheating. Where issues do occur, we will work with residents in a non-judgemental way in order to understand what has gone wrong and to rectify problems as quickly as possible.	Internal and external		
<b>Getting It Wrong</b>	Inappropriate technology is installed on tenants' homes, leading to increased costs or property damage.	Coastal has experience of this risk from damp issues arising from past Arbed works. This risk will be mitigated by ensuring maintenance colleagues work according to PAS:2035 and have other appropriate knowledge and property appraisal skills. Coastal will seek robust guarantees from all contractors and suppliers, and will take action itself in order to rectify any situations arising from decarbonisation mistakes.	Internal and external		
<b>Skills Shortages</b>	Required skills or knowledge to deal with challenges, problems or new technologies are missing from Coastal.	Coastal has a great track record of investing in its staff, in order to improve its operation and to reduce staff turnover and retain knowledge. Coastal will ensure that its operatives are trained in the relevant technologies such as heat pump and solar PV installations, ensuring their performance and upkeep can be managed as efficiently as possible.	Internal and external		

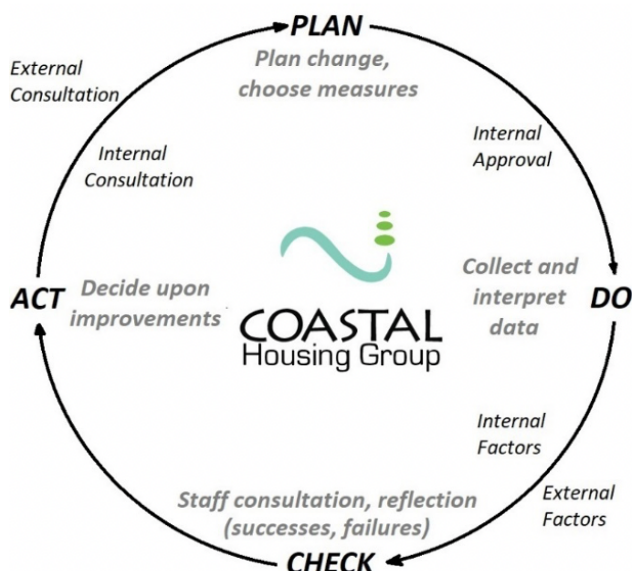
Risk	Definition	Mitigation	Source	Severity	Likelihood
<b>Lenders</b>	Coastal is dependent upon financial markets to fund its new building projects. Lenders are increasingly demanding better environmental performance, which must be evidenced to obtain the best loan rates.	Coastal will incorporate the environmental measures from the Sustainability Reporting Standard For Social Housing (SRS, 2020) into this strategy to ensure that data required by lenders is collected. These measures are all relevant to the purposes of this report; social and governance measures will be assigned owners and the ESG data will be readily available to satisfy lenders' needs alongside annual reports arising from this strategy.	External		
<b>Regulatory</b>	The law, and expectations of the social housing regulator, change. These changes must be acted upon promptly.	This strategy will remain a live document and will be updated regularly in accordance with the procedures set out in section 6. This will ensure that Coastal's sustainability work continues to improve as well as meeting the expectations of stakeholders.	External		
<b>Future Standard Changes</b>	Legislative changes negate works already complete or shift to make further changes necessary.	This is similar to the original WHQS requiring all properties to reach an EPC of 'C' whilst the forthcoming WHQS2 will likely require an EPC of 'A', meaning all properties must be re-visited. Coastal will therefore assess each project and operation on its merits and assess where present regulatory standards can be exceeded, or risk assess where future issues may arise.	External		
<b>Impact on Stakeholders</b>	As a community based organisation, Coastal is aware of its wider stakeholders, including government, residents local to its developments and others.	As it has always done, Coastal will act responsibly with respect to the expectations of wider stakeholder groups. The wider expectations of government (not just as a provider of finance) will be considered, as well as those of the public at large who look to third sector organisations to lead positive social change. Through implementing this strategy, Coastal hopes to become a local leader in sustainability and it will allow others to hold it to account through its annual reporting.	External		
<b>Technological Changes</b>	Technologies which are at present immature or do not exist enter the marketplace, meaning decisions must be made about their adoption and possible replacement of existing installations.	A relevant example is whether natural gas can be replaced with hydrogen or whether electricity will be the sole fuel in the future. Coastal will ensure that it keeps abreast of industry trends and knowledge so that all choices can be risk-assessed. In all cases, the most appropriate and effective option will be chosen. Gas installations will remain where existing properties are changed to be heated by electricity, in case in future hydrogen becomes mainstream.	External		

# 6. Maintaining this strategy

The risks listed above show that a major threat to the success of this strategy is that the world beyond Coastal's control continues to move and change. Technologies are improved and become obsolete, governments and their policy priorities change and also Coastal's staff is not static.

Coastal also intends to develop this strategy as we learn through doing and try to embed a change in our working culture and outlook. It is therefore crucial that this strategy be continually reviewed and updated to reflect what risks Coastal faces and what progress we are able to evidence. Regular consultations and refreshes will also help to keep sustainability at the forefront of people's minds as Coastal works to change our culture.

The figure below shows the phases for the continuing development of this strategy. At the 'plan' stage, the content and wording of the strategy will be agreed or updated.



At the 'do' stage, the approved version of the strategy is rolled out, with responsible members of staff beginning to collect the data associated with the measures which have been allocated to them.

At the 'check' stage (which will overlap with the 'do' stage), staff will be consulted in order to assess their experiences, what's going well and what can be improved. At the 'act' stage, the findings from staff feedback will be discussed and further conversations will take place in order to decide how to incorporate staff feedback by amendments into the strategy. Back at the 'plan' stage, the changes are made and the strategy is re-drafted, ready for the next iteration to be rolled out across Coastal.

Suggested amendments for this strategy will, we hope, be received from all groups of stakeholders. In each case, Coastal will:

## Staff

- Select interested staff to form permanent members of a sustainability working group, including at least one director (Appendix 1).
- Record all suggestions made by staff. It is Coastal's staff who will have to implement this strategy and their feedback on its workability and development is crucial.
- Discuss all staff suggestions at meetings of staff charged with maintaining this strategy.
- Provide staff with regular updates on the operation of this strategy via internal communication channels.

## Residents

- Ensure, as far as possible, that all residents are aware that this strategy has been introduced.
- Invite informal feedback via e-mail and social media channels.

- Arrange meetings and focus groups with residents who have expressed an interest in working with us in order to provide better insight to interested residents, and to collect their suggestions.
- Give due consideration to any and all suggestions for changes to this strategy from residents. Where suggestions are rejected, Coastal will provide feedback upon request.

### **Regulators and the Public Sector**

- As part of the plan-do-check-act cycle, seek the opinions of key persons in local and Welsh Governments and beyond.
- Act upon feedback from public sector stakeholders by discussing responses at meetings of the sustainability working group.
- Monitor regulatory changes and incorporate mandatory actions into this strategy as measures, noting that such measures are mandatory.

### **The Public**

- Publish this strategy online and announce the fact through Coastal's social media channels. This will allow total openness and accountability, with feedback welcome from all comers.

# 7. Appendix 1

## **Key legislation, regulations and requirements**

This section lists the key requirements to which Coastal must adhere at all times. The list is included here as a brief guide to the relevant requirements, however this list will be reviewed on a regular basis and should not be taken as authoritative.

- Health and Safety at Work Etc. Act 1974
- Working Time Regulations 1998
- Equality Act 2010
- Waste Electrical and Electronic Equipment Regulations 2013
- The Well-being of Future Generations Act (Wales) 2015
- Construction Design and Maintenance Regulations 2015
- Planning Act (Wales) 2015
- Public Contracts Regulations 2015
- Environment (Wales) Act 2016
- Renting Homes (Wales) Act 2016
- The Waste Enforcement (England and Wales) Regulations 2018
- Regulation of Registered Social Landlords (Wales) Act 2018
- Renting Homes (Amendment) (Wales) Bill 2021
- Development Quality Requirements 2021
- Building Regulations (Wales), Various Years
- Welsh Housing Quality Standards



# 7. Appendix 2

## Coastal's Sustainability Working Group, 2021-2022

The sustainability working group is named here in order to improve visibility and transparency, as well as to evidence that responsible staff resource has been committed.



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# All Possible Action

A SUSTAINABILITY STRATEGY FOR  
COASTAL HOUSING

## Acknowledgements

This strategy has been created with vital input from Coastal residents as well as diverse stakeholders.

Coastal is grateful to everyone who took the time to talk to us and help shape the future of how we do business. You know who you are; thank you.

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