



## **Wales Safer Communities Network response to: Welsh Government - Consultation on the White Paper on securing a path towards Adequate Housing, including Fair Rents and Affordability**

Closed 31 January 2025

Response submitted via the online survey.

### **Questions**

**Q1: If the seven factors of adequate housing were used in Wales to monitor housing adequacy, what indicators could be appropriate to evaluate each of the seven factors of housing adequacy? (The seven factors are listed below and a more detailed discussion of each factor is set out earlier in Chapter 2. Please use these as headings and set out under each heading the indicator or indicators you believe may be appropriate to use)**

- **Security of tenure**

As part of the ongoing governance and quality assurance of landlords, submission of contracts via Rent Smart Wales should provide templates. By using agreed templates it sets out the quality of tenure and can be quantitatively recorded if contracts are signed and saved via the portal. We agree that the template should stipulate any notice period and would provide a National approach to combating harassment and other threats.

- **Availability of services, materials, facilities and infrastructure**

Working with utility companies and Local Government the landlord should have a duty to identify the services, materials, facilities and infrastructure they are offering as agreed by those companies- and it should be possible to introduce a certificate of provision which could be uploaded to the Rent Smart Wales portal to be managed in one place- available to prospective tenants and clearly visible as to what is on offer. If the minimum standards are not met the property can not be rented.

- **Affordability**

Whilst we appreciate this will be variable between properties, we suggest landlords should be required to work with local authority approved RSL or Estate agency (this may incur a cost to the landlord- but should be a flat rate as agreed with the LA). Again, we suggest that confirmation of value should be made available on the Rent Smart Wales portal which will ensure prices are not over inflated and vulnerable people are not exploited.

- **Habitability**

Similar to availability of services we suggest landlords are required to liaise with Local Government and engage with some form of Housing Officer or perhaps a third party such as the Fire and Rescue Service who should conduct a site inspection. Again, we suggest that quality assurance certificate is uploaded via the Rent Smart Wales portal.



- **Accessibility**

We suggest this is managed in two ways, that it forms part of the agreement with Rent Smart Wales- failure to comply will mean a revoke of contract. And physical accessibility should be form part of the inspection (as suggested under *Habitability*) by a Housing Officer who should conduct a site inspection

- **Location**

In the same vein as the suggestion for *Availability of services*, there is a need for Welsh Government and Local Government to identify the minimum provision they believe to be acceptable. It is the duty of the landlord to research local amenities and liaise with Local Government to confirm if there are any hazards (pollution/ known dangers in the area). Again, this information should be uploaded to the Rent Smart Wales portal to be managed in one place- available to prospective tenants and clearly visible as to what is on offer. If the minimum standards are not met the property cannot be rented.

- **Cultural adequacy**

Working with Welsh Government and Local Government Rent Smart Wales registration should act as a contractual agreement between WG/LA and tenant, and suggest that cultural adequacy forms part of this agreement. Monitoring should form part of the inspection (as suggested under *Habitability*) by a Housing Officer who should conduct a site inspection.

**Q2: If indicators are developed to measure housing adequacy in Wales, should they apply in the same way across Wales or should they feature a degree of regional or localised variation? If so, how might this work in practice?**

Yes

The Network do not disagree with measuring against the seven factors outlined above, and suggestions have been made as to how indicators can be managed. We suggest aligning the required data capture at a National level as suggested above, however it is essential that in the creation of the templates, each local authority (as highlighted in the previous answer) reviews and is responsible in identifying the local variables to ensure local need, local resources and regional nuances (such as urban- rural differences) are taken into account.

We suggest making use of the existing infrastructure for example Rent Smart Wales to make it most effective.

We appreciate that these suggestions could be costly and will need Welsh Government investment to create templates; rewrite Rent Smart Wales tenant registration agreement; employ, upskill or outsource 'Housing Officers'; set up and work with local businesses and implement a communication plan to update tenants and the public of the changes. However, the process will also be income generating- though costs should remain minimal in order not to discourage tenants from the rental market.



**Q3: Should people who live in a particular local authority area be able to access adequate housing in any locality of their choosing within that local authority? What are your views on this matter?**

Yes

We strongly support individuals being able to buy or rent a property within any Welsh Local Authority area that they wish to. We recognise that house values may mean some areas will be more challenging with fewer more affordable houses available, but it is essential for individuals that have lived and worked in the area, who wish to remain connected to their family/ friends and home, save them being priced out. If there is no existing affordable housing provision then Local Authorities/ Welsh Government need to address this working with partners such as Private property developers as well as Designing out Crime Officers to ensure new developments are fully integrated and avoid a 'them and us' divide.

**Q4. Should elements of the adequate housing framework apply to the owner occupied sector (Yes/No/No views/Don't know)? If so, how might this be made to work in practice and what issues require further consideration?**

Yes.

In theory the Network would welcome any support to increase the housing quality of all homes, privately owned or rented. However, the Network recognises that implementing this at the same time as the Rented Sector may be too ambitious. We suggest rather than pushing for all at once, introduce the Framework for the private rented sector first, with adequate time for learning and review and then schedule the move to implement processes to the owner-occupied market which can be based on the learning and impact review of changes made to the Private Rented Sector.

**Q5. In your view, would the proposal to require Welsh Ministers to produce a housing strategy help progress towards ensuring access to adequate housing for people in Wales? (Yes/No/Don't know). Please explain your reasoning.**

Yes.

In principle the Network would welcome this proposal. However, our concerns have not changed. We recognise introducing a Housing Strategy will have a significant impact on Local Authorities and as such implementation would need to be supported by additional finances to ensure resources, staff and housing stock is not only available but can be maintained across Wales.

**Q6. Should there be a requirement on Welsh Ministers to draw on the seven factors of housing adequacy when drafting the strategy? (Yes/No/Don't know). Please explain your reasoning.**

Yes.

The Network supports the idea that Welsh Ministers should draw on the seven factors of housing adequacy as we feel it would help shift the focus on the health and safety needs of tenants away from profit and portfolio sizes. However, as argued in the Green paper response, we would also suggest a level of flexibility to enable additional elements to be considered if trends and data analysis suggested that additional areas of concern ought to feature as a priority such as funding, especially given the ongoing cost of living challenges.



**Q7. How often should Welsh Ministers be required to review the strategy? (Every year; Every 2-3 years; Every 4-5 years; There should be no such requirement; Don't know; No views). Please explain your reasoning.**

Every 4-5 years

We feel that the review should be in line with similar Welsh Government Strategies and 4-5yr strategy does not sound unreasonable, as long as there is flexibility to review sooner should the need arise.

**Q8. How often should Welsh Ministers be required to report on progress on delivery of the strategy to the Senedd (Welsh Parliament)? (Every year; Every 2-3 years; Every 4-5 years; There should be no such requirement; Don't know;). Please explain your reasoning.**

Every year

An annual review seems appropriate

**Q9. Do you agree rent data should be collected at a local level by Rent Smart Wales (e.g. ward or postcode)? (Yes/No/Don't Know)**

Yes

**Q10. Other than those already outlined, are there any other principles or objectives that should be considered in developing how rent information should be provided to RSW?**

Please refer to our response to Q1

**Q11. Do you think spatial mapping of amalgamated rent data is useful and should be made publicly available? (Yes/No/Don't Know- Why?)**

Don't Know

Whilst the idea sounds helpful for those looking for affordable properties, making it public may have unforeseen consequences such as a cheap property development opportunities pricing out the affordable rental market

**Q12. Do you think there should be a mechanism to challenge a rent increase? (Yes/No/Don't know- Why?)**

Yes

Having a process to challenge unfair price increases could potentially help safeguard individuals/families from possible financial exploitation. The Scottish valuation example appeared a sensible approach to consider replicating in Wales.

**Q13. Do you think license holders should be required to complete an Annual Property Condition Record? (Yes/No/Don't Know- Why?)**

Yes

We believe this would be a quick, effective and manageable process



**Q14. In your view, what information should be included in the Annual Property Condition Record? For example, should rent data be collected by the Annual Property Condition Record?**

Please see our response to Q 1

**Q15. Are there any other groups of people who have not been identified in the eligibility criteria who should be considered? Please specify any groups who have not been identified in the proposed eligibility criteria.**

We would suggest consideration should also be given to individuals leaving the secure estate.

**Q16. Do you think permitted payments would support people with pets to access the PRS? (Yes/No/Don't know- Why?)**

Yes

The Network agree in principle with the proposals outlined for permitted payments.

**Q17. Do you anticipate any positive or negative impacts which would result from this proposal?**

Yes

In support of this proposal we wish to highlight that people leaving abusive relationships often cite their pets as being a barrier to leaving. If it were easier for pet owners to find accommodation within the private rented sector this could have a positive impact on this group of people.

**Q18. Do you think the proposed criteria for a refund of the Land Transaction Tax higher residential rates element of the tax charge would incentive landlords and increase access to affordable PRS homes? (Yes/No/Don't Know- Why?)**

Yes

The proposal seems attractive and may well encourage more temporary private rental properties to become available. However, this is not a long term solution and should be seen as just one aspect to address short term needs. Further work is required to ensure long term properties are made available.

**Q19. What period of time between the purchase of the dwelling and entering the headlease with the local authority should be provided to be eligible for a refund?**

We are unable to comment

**Q20. Do you anticipate any positive or negative impacts which would result from this proposal?**

We are unable to comment

**Q21: Do you have any further evidence or observations you wish to provide?**

No further comment at this time