HO(2) 8 Ymgynghoriad ar ddigartrefedd – Hydref 2022 Consultation on homelessness – Autumn 2022 Ymateb gan: Cartrefi Cymunedol Cymru Response from: Community Housing Cymru





Written evidence for the Local Government and Housing Committee: Homelessness

November 2022

About us

Community Housing Cymru is the voice of housing associations in Wales. We represent and support 36 housing associations. Our members provide almost 165,000 homes to 10% of the Welsh population, including sheltered, extra care and care home accommodation. Housing associations (HAs) provide a variety of temporary housing in different ways - for example, leasing buildings to local authorities (LAs) or a support provider.

1. The supply, suitability and quality of temporary accommodation currently being used to house people experiencing homelessness and the support services made available to them.

HAs are committed to playing their role in ending homelessness. Part of this is developing and supplying suitable temporary and settled accommodation for a range of households. However, HAs question whether it is possible to produce temporary accommodation at the pace and scale we need, at the same or similar standards that are required for settled housing.

We recognise the pressures facing local authorities and other partners and the lack of sufficient permanent accommodation. We welcome efforts to remedy some of these challenges through the Transitional Accommodation Capital Programme (TACP). However, the long term solution is to focus on building sufficient secure and affordable social homes. The Welsh government should continue to support HAs to deliver quality housing that is adaptable and repurpose existing homes to respond to community needs. For example, converting HMOs into single 6 or 7 bedroom properties to accommodate multi-generational living.



HAs are working hard to find solutions to these challenges and to meet the urgent need for good quality accommodation. However, they are navigating a complex policy and funding environment. An overarching strategy would be welcome to draw together the different elements of our homelessness response: temporary accommodation, transitional accommodation and settled accommodation. This could help us to understand how individual policies (such as rapid rehousing, transitional accommodation and the move away from B&B temporary accommodation) interact with each other and how they might be achieved in the current context.

We will have to be realistic about what is deliverable, and what it will take to make our collective ambitions a reality. The different elements must be considered together and our cohesive approach should evolve and adapt to the ever changing landscape. Above all, the strategic approach must provide clarity and focus, with each stakeholder understanding their role and contribution so that we can support each other's efforts.

2. The impact living in temporary accommodation has on individuals and families.

HAs recognise the impact that living in temporary accommodation has on individuals and families, and that this is exacerbated by the length of time that some people live there. We would highlight that there are two aspects to this impact: the suitability and quality of the accommodation for that household, and the instability and uncertainty that comes from not having a settled home.

Just as homelessness should be rare, brief and unrepeated, we believe that time living in temporary accommodation should also be rare, brief and unrepeated. In order to achieve this goal, we must invest in the development of high quality, affordable settled housing while ensuring that temporary accommodation is of an appropriate and proportionate standard.

3. The impact of the ongoing demand for temporary accommodation and support services on local authorities, their partners and communities.

The Welsh government and LAs must acknowledge that there has been a change in the pressures on allocations processes over the past few years. HAs are routinely dealing with a higher number of more complex cases. Therefore, it is even more important that providers and statutory partners work together to deliver a support package that is right for the individual and provides robust support to ensure the household can move on to a successful tenancy.

Once an individual or household has moved onto settled accommodation it is important that the necessary support continues to be available. HAs believe that this support should be provided through multi-agency collaboration; LAs, HAs and other organisations all have a responsibility to maintain a tenancy where it is in the best interests of the individual. We would ideally see commitment from delivery partners to support new tenancies for the first 12 months.

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We feel that the Welsh government must review how they measure and monitor success within this area to clearly understand the issues presented by the 'revolving door' scenarios. As a collective, we must make allocations that are long lasting, sustainable and suited to the needs of the individual. Therefore, we must collect data at the point of tenancy being sustained for 12 months as well as monitoring the levels of people within temporary housing.

4. Options to increase the supply of affordable and appropriate housing in the short to medium term to reduce the use of temporary accommodation.

HAs are under enormous pressure to deliver high quality housing at an accelerated rate whilst also facing an unprecedented number of external barriers which are beyond their control. These include a reduction in specialist personnel within the planning and environmental management systems, a lack of strategic oversight, market circumstances, as well as spiralling costs in several areas.

In order to address this, swift action is needed to ensure that there is sufficient access to land for social housing development and that the system of planning and environmental management has our shared ambitions of tackling the housing crisis and climate change at its heart. Current systemic and resource barriers must be addressed to ensure that affordable homes can be built within all areas of Wales at the pace and scale that we need them. Increasing regional access to specialists in planning and environmental management is vital.

HAs highlight that there is a disconnect between the 'numbers game' and the support necessary to sustain tenancies. Wrap around support must be made available for tenants, e.g. mental health services, financial wellbeing assistance and tenancy sustainability, and funding for these must be regarded as equally important as building new homes. Accommodation and support are not mutually exclusive. There must be clear revenue funding made available to complement the capital support already in place.

5. Progress implementing Ending Homelessness in Wales: A high level action plan 2021-2026, and in particular the move towards a rapid rehousing approach.

HAs must be involved in Rapid Rehousing plan development as they will be a key partner in the delivery. The main challenge is that we have a shortage of both appropriate settled accommodation and temporary housing, and that there is currently no slack in the system. Action must be taken to address barriers and lack of resources within the planning system that are preventing housing associations from increasing housing supply to meet need within Wales.



Alongside this need for accommodation, however, is the need for preventative support and tenancy sustainment. There is a high number of tenants who need support to be successful in their new settled home, and an increasing number of these tenants have very complex needs. This trend has emerged, and is continuing, since the pandemic.

The world has changed since the publication of the action plan, and it is likely to continue changing rapidly. We must ensure that our efforts respond to and account for this volatility, and the impact this has had on both individual and organisational capacity and resilience. This means supporting and rewarding our workforce, and finding a way to ensure that all delivery partners have the capacity and resources necessary to fully play their part.

The Welsh government must make clear the priorities for HAs and how they can best contribute. HAs have made a commitment to ending evictions into homelessness, and are determined to maintain this approach. For this to happen, HAs must be involved from the earliest opportunity and there must be transparency between HAs, LAs and the Welsh government so all partners can be realistic about what can be delivered.

For more information, please contact: