

Senedd Local Government and Housing Committee

Social housing supply inquiry

April 2024: Crisis response



About Crisis

Crisis is the national charity for people facing homelessness across Wales, Scotland and England. We know that homelessness is not inevitable, and we know that together, we can end it.

We provide services directly to people experiencing homelessness, carry out research into the causes and consequences of homelessness, and campaign for the changes needed to end it.

Introduction

A safe and settled home is the foundation on which people can build a decent life and meet their true potential. Having a decent home is vital for good health and wellbeing and makes it easier for people to succeed at work and in education, to maintain relationships with family and friends and to contribute to their community. Making sure that everyone has a safe and affordable home benefits us all.

However, the chronic undersupply of housing in Wales means that thousands of people are living without a home - the most recent annual statistics show that 12,537 households were homeless during 2022-23¹ and the most recent monthly statistics show that 11,501 individuals are living in temporary accommodation, while 126 people are sleeping rough.²

Our Homelessness Monitor Wales in 2021 reported that 18 of 22 local authorities disagreed or strongly disagreed that social housing provision in their locality was adequate.³

Nearly 8,000 people are on the waiting list for social housing in Swansea⁴, where our Crisis Skylight South Wales Centre is located. The length of social housing waiting lists affects Crisis members in the following ways:

- **Temporary accommodation** – many of our members are stuck in temporary accommodation for several months, and in some cases, years. This accommodation is often substandard and unsuitable, which can strip a person of their dignity and leave them with little autonomy and control over their own lifestyle and future. In temporary accommodation, our members often lack basic laundry and cooking facilities and face restrictions on visitors, curfews or requirements to report at a certain time.

¹ Welsh Government (2023) [Homelessness: April 2022 – March 2023](#).

² Welsh Government (2024) [Homelessness accommodation provision and rough sleeping: January 2024](#).

³ Fitzpatrick, S., Pawson, H., Bramley, G., Young, G., Watts, B. & Wood, J. (2021) [The Homelessness Monitor: Wales 2021](#). London: Crisis

⁴ Youle, R. (2024) [Housing waiting list is now around 8,000 in Swansea](#). Wales Online.

- **Deterioration of mental health** – lack of access to social housing and the uncertainty caused by the length of waiting lists increases anxiety and depression.
- **Unsuitable alternative housing** – because of the lack of social housing available, our members often feel pushed into housing that is unsuitable for their needs. This can include unaffordable and/or uninhabitable private rentals, as well as feeling under pressure to accept an unsuitable social housing placement. This, in turn, can increase the risk of repeat homelessness.
- **Distrust in public services** – some of our members have lost belief that they will ever be allocated a social home, which leads to feelings of hopelessness and a lack of trust in the system.
- **Re-offending and return to prison** - some of our members are prison leavers who are trying to make a positive change to their life, but rehabilitation and reintegration into the community can be extremely difficult without access to stable housing.

Crisis is also acutely aware of the pressures that the lack of social homes and, in turn, the dependency on temporary accommodation places on local authority support services. For example, in a recent report on homelessness services in Flintshire, Audit Wales reported that the council forecasted a spend of £4.847 million on bed & breakfast / hotel accommodation in 2023-24 compared to £1.503 million in 2022-23.⁵

Housing supply and the commitment to end homelessness in Wales

Crisis welcomes the Welsh Government's outlined commitment to ensure homelessness in Wales becomes rare, brief and unrepeatable. As set out within the Welsh Government's National Action Plan on Ending Homelessness, "supply and availability of housing for households who have experienced or face homelessness plays a vital role in meeting this objective." As part of this, the plan also commits to moving towards a model of rapid rehousing (where everyone can access a stable home as swiftly as possible) and, crucially to ensuring that plans to increase housing supply matches housing needs.

While the Welsh Government has taken strides forward in aspects of the Action Plan, such as its recently published White Paper to overhaul homelessness legislation and ensure support is more inclusive, it is clear that there remains a distance to travel in addressing the issues with housing supply across the country.

Indeed, within its most recent annual report, the Ending Homelessness National Advisory Board's (EHNAB) identified that it is "crucial to keep driving forward a step-change in increasing the supply of housing that people can afford."⁶ The report added:

"We must work together to closely evaluate and address the gaps in housing supply which threaten to undermine the transition towards the rapid rehousing approach. Supporting local authorities in their strategic planning and adoption of rapid rehousing is

⁵ Audit Wales (2023) [Homelessness services – Flintshire County Council](#)

⁶ Ending Homelessness National Advisory Board (2023) [Annual Report to Welsh Ministers 2022-23](#)

also crucial, given that this is so fundamental in making homelessness rare, brief and unrepeated.”⁷

Similarly, the Expert Review Panel, which was tasked with making recommendations to the Welsh Government on how legislative change can help to end homelessness in Wales, emphasised:

“While the panel believes these recommendations to be a robust package of reforms, it is imperative that appropriate resourcing accompanies the reforms and that the underlying deficits in housing supply are addressed. Throughout the past year, the panel has heard concerns from all corners that our homelessness support services are under unprecedented pressure and that the social housing supply across Wales falls far short of matching demand. Although changes to the law certainly set clear baseline standards, these standards will not be consistently met without sufficient investment in [...] housing supply.”⁸

If we are to achieve the aims of the Welsh Government’s Ending Homelessness Action Plan and truly end homelessness in Wales, it is abundantly clear that we need social homes to be delivered at pace – homes that deliver against the wide-ranging housing needs of those who are facing homelessness. We are therefore pleased that the Committee is conducting this inquiry to understand how the supply of social housing can be accelerated in Wales and have provided evidence corresponding to the terms of reference below.

Inquiry terms of reference

- 1. Progress towards meeting the target of 20,000 low carbon social homes for rent; and the extent to which current and projected levels of social housebuilding are likely to meet housing need**

Crisis understands that while progress has been made towards the target of 20,000 low carbon social homes for rent, it is unclear whether the target will be met by 2026. We are aware that there have been a number of challenges in meeting this target, including issues around phosphate levels, flooding, delays within the planning system and increased construction costs. It is our understanding that, as a result of these challenges, Welsh Government officials are looking beyond new builds and including acquisitions in working towards this target.

We understand that Audit Wales will be publishing a report later this year assessing progress towards meeting the target and would advise the Committee to scrutinise the findings of the report.⁹

As outlined within the Welsh Government’s National Action Plan to End Homelessness, it is important that we ensure data on housing need drives and connects to the social housing that local authorities plan and build across Wales. We know there is a particular problem with the supply of certain types of housing required to meet the housing needs

⁷ Ending Homelessness National Advisory Board (2023) [Annual Report to Welsh Ministers 2022-23](#)

⁸ Expert Review Panel (2023) [Ending Homelessness in Wales: A Legislative Review](#)

⁹ Audit Wales (2024) [Annual Plan 2024-25](#)

of people experiencing and at risk of homelessness. For example, there is a severe shortage of one-bed properties which makes it difficult to find properties for homeless single people, and a lack of suitable properties for larger families,¹⁰ as well as a lack of suitable accommodation for disabled people and people with complex health needs.¹¹

The Welsh Government has recognised that in order to end homelessness, we must ensure that our social housing supply is able to deliver “*the right homes in the right communities with the right support, in order for people to succeed and thrive*”.¹² However, while there are mechanisms in place to assist with aligning housing need with supply, it remains to be seen whether or not the social housing programmes that are currently underway will effectively achieve this aim.

Indeed, within its report to the Welsh Government, the Expert Review Panel recognised that:

“...existing legislation requires local authorities to produce various strategies, including the Homelessness Strategy and, at present, Rapid Rehousing Transition Plans. Guidance calls for these strategies to be utilised in “co-ordination between the planning cycles.” However, the panel understands that these strategies are not working effectively to increase housing supply in practice.”¹³

To this end, the panel emphasised the need for the Welsh Government to address this issue in tandem with legislative reforms.

Crisis is aware of a number of areas of ongoing work which seek to ensure that housing need and planning better align, but much of this work is still under development (as outlined below).

Firstly, Crisis is aware that the Welsh Government recently moved to a new LHMA template and, in line with the recommendation from the 2019 review,¹⁴ requested each local authority to submit returns to Welsh Government by 31 March 2024. While there has yet to be any data published from this, we understand that engagement levels have varied across local authorities. It will be important that the Welsh Government carefully analyse the LHMA returns and consider whether these returns are sufficiently encapsulating the level of housing need.

In addition, Rapid Rehousing Transition Plans should be at the heart of strategic local plans for developing housing supply that aligns with local housing needs. Moving towards a rapid rehousing approach is a crucial part of ending homelessness in Wales, but this simply cannot be achieved without addressing the relevant gaps in housing supply. While Crisis is pleased that the Welsh Government called for all local authorities to produce a Rapid Rehousing Transition Plan, we are aware that progress in developing these plans varies across different local authorities. A clear review of these plans and the processes involved in their development is needed to ensure the commitment to rapid

¹⁰ Expert Review Panel (2023) [Ending Homelessness in Wales: A Legislative Review](#)

¹¹ Equality and Human Rights Commission (2018) [Housing and disabled people: Wales' hidden crisis](#)

¹² Welsh Government (2021) [Ending Homelessness in Wales: A High Level Action Plan 2021-2026](#)

¹³ Welsh Government (2021) [Ending Homelessness in Wales: A High Level Action Plan 2021-2026](#)

¹⁴ Independent Review of Affordable Housing Supply (2019) [Final Report April 2019](#)

rehousing is appropriately reflected in plans for increasing housing supply across the nation.

Crisis is currently working with Heriot Watt University on the latest edition of the Homelessness Monitor for Wales, and we hope that this will provide further insight on the status of Rapid Rehousing Transition Plans and the barriers towards their progress. Anecdotally, we understand barriers that local authorities have faced in producing these plans, include a lack of buy-in from planning colleagues and from elected council members. It is imperative that the Welsh Government continues to drive forward the Rapid Rehousing agenda, continuing to support the development of Rapid Rehousing Transition Plans and placing particular emphasis on the importance high-level strategic ownership of these plans across local government departments.

Crisis is pleased that the Ending Homelessness National Advisory Board has emphasised the need for a *“greater understanding of the approach across local government departments as well as strengthened strategic collaboration to ensure efforts to increase housing supply are effectively matched to plans for a Rapid Rehousing approach.”* To this end, the Board’s Rapid Rehousing Task and Finish Group intends to embark upon a project which will deep dive into three local authority areas, analysing how data and information on the housing needs of people who are experiencing homelessness informs the delivery of housing supply, both in planning and in practice. The group intends to use this analysis to identify detailed recommendations for how local authorities across Wales can improve the alignment of the needs of those experiencing homelessness with the expansion of housing supply, drawing on good practice, learning and any identified barriers. It will be imperative that learnings from this work are brought forward to improve systems across the country.

In summary, it is important to maintain a focus on the 20,000 target, but it is also crucial to consider whether the types of social homes made available within this target will meet housing need and alleviate the stresses in the system and rising levels of homelessness. It is imperative that the Welsh Government continues to explore how strategies can better align to build more social homes at pace that match housing need and addresses homelessness across local demographics. It will be of upmost importance that learnings from the areas of work outlined above are brought forward, and that there is careful and continuous monitoring of progress in this area. If we are to truly end homelessness in Wales, we must ensure that the funding and planning of social and affordable homes in every local authority connects with the Welsh Government’s national commitment to make homelessness rare, brief and unrepeatable.

Crisis would also like to take this opportunity to highlight that, as highlighted above, the need for social housing is growing – not least because increasing numbers of people are presenting to their local authority as homeless. This not only points to the importance of meeting this target, but also to consider how social housing supply must continue to grow at pace beyond meeting this target.

2. The challenges faced by social landlords in increasing supply

Crisis enjoys good working relationships with organisations across the housing and homelessness sector in Wales, including registered social landlords. From our engagement with our colleagues within the sector, as well as policy research, we understand that social landlords are facing many barriers to increasing supply. These include but are not limited to:

- Cost of borrowing – high interest rates negatively affecting the financial viability of developments
- Skill gaps within the planning and construction sectors¹⁵
- The cost and availability of construction materials, particularly since Brexit
- National Resources Wales environmental targets (phosphates)
- Planning system – delays, politicisation and stigma (explored further in response to **Question 5**)
- Barriers and challenges of joint working with local authorities
- Fluctuation in grant rates for development of new social housing

3. How housing standards and decarbonisation affect the delivery of new social housing

Crisis believes that meeting housing standards and decarbonisation targets is an important part of ensuring that new and existing housing can realise its potential as truly sustainable homes that meet the needs of current and future generations of Wales.

Housing standards are essential to ensuring that newly delivered housing provides an environment where people can make a home where they feel safe and that their dignity is protected. We know from our work with people with lived experience of homelessness that this is key to preventing and sustainably ending homelessness.

The decarbonisation of housing will also help to ensure that homes in Wales are sustainable – energy efficiency is essential for reducing fuel poverty and ensuring that people living in social housing can afford to heat their homes.

In efforts to achieve high quality housing and the decarbonisation of housing, we must ensure that the people living in social housing are not shouldering the costs of improvements via increased rent levels.

We support the Welsh Government's investment in this area and welcome news that the Welsh Government is working with social landlords and local authorities to assess the decarbonisation needs of social housing stock. We recommend that the results of this research inform the establishment of a "fully-costed plan and deliverable timetable and strategy" for decarbonisation at scale, as called for by Community Housing Cymru.¹⁶

It is important to remember that, whilst meeting these standards and targets incurs significant up-front costs, the benefits of high quality, energy efficient homes justify the

¹⁵ RICS (2024) [Confidence rises in UK construction sector](#)

¹⁶ Senedd Climate Change, Environment, and Infrastructure Committee (2024) [Scrutiny of the Welsh Government Draft Budget 2024-25](#)

investment in the longer term, not just within housing budgets, but across the public sector.

For example, Public Health Wales research shows that every £1 spent on improving warmth in homes occupied by vulnerable households yields £4 in health benefits.¹⁷

Adherence to these standards and targets is also imperative in our work towards enshrining the right to adequate housing in Wales.

4. The opportunities and risks in increasing government borrowing and institutional investment

There is a growing body of evidence to show that increasing UK Government investment in the delivery of homes at social rent levels delivers value for money.^{18 19}

Homelessness is not only traumatic on a personal level but can also be costly to the public purse, so it makes economic sense to invest in social housing as part of strategy to prevent and end homelessness. Investment would play a critical role in reducing housing waiting lists and, in turn, reduce reliance on expensive and unsuitable temporary accommodation.

We also know that longer-term homelessness and poor housing standards often lead to increased and more complex health and support needs, which incurs costs for health and social care. Public Health Wales estimate that poor quality housing in Wales is costing the Welsh NHS more than £95m per year in first year treatment costs alone and that the overall cost to Welsh society is over £1bn.²⁰

In the long-term, increasing investment in this area will lead to savings across the Welsh public sector, especially as it works in tandem with other areas of the ending homelessness national plan to ensure that homelessness becomes rare, brief and unrepeatable in Wales.

To maximise opportunities for local authorities to invest in social housing, Crisis supports the case for reform of the UK's fiscal and accounting rules to bring us in line with other OECD countries and facilitate borrowing for investment.

Current UK Government fiscal rules mean that additional local authority borrowing counts against public sector debt, even though the borrowing is fully self-financed from local authority housing revenue accounts and social housing owned by local authorities is run by public corporations. Under these rules, if local authorities borrow money to

¹⁷ Watson I, MacKenzie F, Woodfine L and Azam S. (2019) [Making a Difference. Housing and Health: A Case for Investment](#). Cardiff, Public Health Wales.

¹⁸ House of Commons Committee of Public Accounts (2022) [The Affordable Homes Programme since 2015: Twenty-Ninth Report of Session 2022–23](#)

¹⁹ CEBR (2024) [The Economic Impact of Building Social Housing](#)

²⁰ Watson I, MacKenzie F, Woodfine L and Azam S. (2019) [Making a Difference. Housing and Health: A Case for Investment](#). Cardiff, Public Health Wales.

increase social housing supply, this is added to public debt. It would be possible however for the UK Government to reform these rules, bringing the UK in line with other countries.

In accounting terms, public corporations are public sector bodies which are judged to service their debts principally from their own revenues. In the UK, this includes borrowing within their housing revenue accounts by local authorities. Many other countries exclude borrowing by public corporations from their measure of national debt on the grounds that these agencies are responsible for servicing their debts from their own revenues. However, in the UK this borrowing is treated as part of the overall debt figure that national government is seeking to minimise. If the UK Government were to align with practices in other OECD countries, it would mean that it no longer had to monitor borrowing for council housing investment in the same way as it controls other public borrowing. This would allow councils to manage their borrowing within levels permitted by borrowing rules, in a similar way to housing associations, without this prejudicing the government fiscal targets.

The UK Government is also unusual in the way it sets its fiscal targets, often without regard to whether government borrowing is financing a current deficit, or whether it creates an investment in an asset (such as new homes). We believe that the UK Government should adopt fiscal rules which reflect a preference for borrowing that creates an asset, a further way of promoting investment by local authorities in new housing.

5. How effectively the planning system is supporting social housebuilding

As outlined at the start of this response, Crisis is pleased to be supporting the Ending Homelessness Advisory Board as it seeks to embark upon 'deep dive' research into three local authority areas in order to assess how effectively planning systems and information on the needs of those facing homelessness in the locality interconnect. It will be imperative to take on board learnings and recommendations from this work across the nation.

More generally, we often hear that the planning system presents obstacles to fast-paced delivery of social housebuilding – a sentiment that was echoed during stakeholder engagement sessions as part of our work on the Ending Homelessness Expert Review Panel last year.

In the last Senedd term, the Public Accounts Committee conducted an inquiry on the effectiveness of Local Planning Authorities in Wales. The Welsh Government accepted all the recommendations within the Committee's report²¹, and it would be useful to be provided with an update on the progress of realising these recommendations.

We were particularly concerned to hear evidence raised during this Committee inquiry suggesting that Section 106 agreements are not being adhered to, likely because of local authorities' lack of capacity to enforce them.²² These agreements can include vital

²¹ Minister for Housing and Local Government (2021) [Response to the Senedd Cymru Public Accounts Committee Report on Local Planning Authorities](#)

²² Senedd Public Accounts Committee (2020) [Inquiry into the Effectiveness of Local Planning Authorities in Wales](#)

commitments on affordable housing and Crisis would, therefore, welcome investigation as to whether these aspects of agreements are being enforced. Furthermore, Crisis is aware that guidance for local authorities on using Section 106 to deliver affordable housing was last updated in 2009²³ and would suggest that there may be benefit in considering a refresh of this guidance in light of the current housing landscape.

We have heard from our partners within the housing and homelessness sector that planning departments within local authorities are under-resourced, and that this is leading to a variety of problems, including delays with planning consent.²⁴

As well as lack of capacity and resource, we are also concerned that the over-politicisation of the planning process is slowing down the development of new social housing. We worry that the stigma attached to social housing is influencing planning decisions. Whilst we understand the need for democratic accountability, we feel that this can only be truly realised if decision makers fully understand the vital role of social housing in society, and particularly its role in preventing and ending homelessness. Raising awareness of homelessness and debunking generalised stereotypes would be beneficial in this regard.

We also feel that part of the solution to this problem is ensuring join-up of the many departments within local government which contribute to this area of work. As identified earlier in this response, it will be particularly important to ensure that in addition to housing support teams, lead planning officers also hold ownership of local Rapid Rehousing Transition Plans. We are pleased that planning is now part of the Cabinet Secretary portfolio which also includes housing and local government, and hope that work in this area could become a part of this portfolio.

6. How to improve the strategic management of public and private land for social housebuilding, including compulsory purchase

Crisis is aware that acquiring land for house building, including for homes for social rent, is expensive and slow. We need to make it easier and cheaper for developers to secure land to build homes for social rent.

We support calls for the public sector to have more control over the strategic management of land and the establishment of a publicly accountable corporation to lead on this.

We welcome the provisions included within the UK Levelling Up and Regeneration Act 2023 which strengthen council powers to capture more of the value of any uplift in land value generated by planning permission ('hope value') for the benefit of the community. We were pleased to see that Julie James, then Minister for Climate Change, confirmed their applicability in Wales in August 2023 and emphasised that the Welsh Government is committed to improving the compulsory purchase process to encourage greater use of

²³ Welsh Government (2009) [Affordable housing using section 106 agreements: guidance](#)

²⁴ Hill D., Buckle, C., Williams, E. (2024) [Welsh Housing Market and Supply Update](#). Savills.

the powers.²⁵ We would welcome further consideration and/or guidance on how local authorities can utilise these powers effectively.

We are also aware that the Bevan Foundation, Housing Justice Cymru and Cwmpas are just beginning a research project in this area, and would advise that the Welsh Government consults this research when it is published.²⁶

7. The potential for increasing income from land value capture mechanisms to invest in social housing

Land value capture mechanisms play an important part in ensuring that the benefits of land value increases are invested back into communities. Crisis believes there is certainly room for improvement in this area.

Firstly, the Welsh Government should look to increase the contribution made through Section 106 to deliver social housing, ensuring that local plan policy targets are grounded in robust assessments of local need that include appropriate provision for social housing.

We also need to ensure that local authorities are maximising the potential of the income they already receive through Section 106 agreements. Research from the Home Builders Federation shows that a significant amount of income from Section 106 contributions is being held unspent by local authorities; they report that a total of £71,405,329 is held unspent in Wales, an average of £5.1 million per local authority.²⁷ Crisis believes that research must be done as soon as possible to understand why this amount of money is being held unspent to ensure that the spending potential is realised.

8. The Welsh construction sector's capacity to build new low-carbon social homes; the potential for acquisitions of existing homes and remodelling of existing buildings

Whilst Crisis does not have extensive information to share in regard to the capacity of the construction sector, we are aware, as noted above, that there are significant skill gaps within the construction sector.²⁸

We understand that work is underway in establishing Unnos and that key objectives will include to improve supply chains, sharing information on modern construction and assisting in bringing empty homes back into use.²⁹ Each of these objectives are welcome areas of work and we look forward to seeing more detail on plans to develop this work.

Crisis suggests that the Welsh Government works with house builders, education establishments and the construction industry to attract school leavers and apprentices to the construction industry, increasing the capacity of the sector to build more homes for social rent. The Welsh Government should also allocate funding for research and

²⁵ Welsh Government (2023) [Levelling-up and Regeneration Bill – Compulsory Purchase Amendments - Hope Value and Compensation](#)

²⁶ Bevan Foundation (2024) [Optimising socially owned land to boost the supply of social homes](#)

²⁷ Home Builders Federation (2023) [Section 106 Agreements and unspent developer contributions in England and Wales](#)

²⁸ RICS (2024) [Confidence rises in UK construction sector](#)

²⁹ Drakeford, M. First Minister for Wales (2023) [Committee for the Scrutiny of the First Minister: Ministerial scrutiny session - the co-operation agreement 08/12/2023](#)

development of new construction techniques, with the caveat that any new social homes built with new or innovative techniques should still comply with standards around size and quality.

Although Crisis strongly believes that building new social homes is crucial, it is also crucial to ensure that we make best use of existing stock.

There are over 25,000 empty homes in Wales – bringing them back into use is an obvious part of the answer to the dearth of supply. We would welcome further consideration of how effectively the Empty Homes Scheme is progressing.

Similarly, the Welsh Government's Leasing Scheme is a commendable initiative, but application numbers are low, and we are aware that not all local authorities are signed up to the scheme. We would encourage the Welsh Government to consider how the scheme might be further improved in order to attract more local authorities and, in turn, property owners.

To encourage property owners to participate in the Leasing Scheme, we would also advise the Welsh Government to disincentivise property owners from keeping homes empty on a long-term basis by making it clear to the general public that homes left empty on a long-term basis are contributing to the housing crisis and homelessness rates.

Another option to explore would be how homes that have been empty on a long-term basis could be acquired by public bodies and brought into public ownership for use as social housing. This could also extend beyond empty homes into tenanted property acquisition: local authorities, housing associations, or community and cooperative organisations should be supported to purchase housing and convert it into social homes. The Welsh Government should explore how to provide financial support in a way that would minimise the financial risk of investment in this area.

Beyond the conversion of privately-owned residential properties into social homes, there is also the potential to explore how we could maximise opportunities to convert unused commercial buildings into social housing. Given that the spaces within these buildings were not initially designed for residential use, it will be imperative to ensure at the initiation of any such projects that the homes delivered will be able to meet housing standards.

9. How local communities can be effectively engaged in social housing developments in their areas.

Crisis is clear that communities should be engaged in planning for new housing developments. However, we do have concerns that the stigma attached to social housing serves as a blocker to new social housing being built in certain areas.

As explored earlier in this response, making sure that everyone has a safe and affordable home benefits us all. It is imperative that the general public are supported to understand this social context of social housing development and the positive impact that it has on communities.

There are a number of tried and tested ways to engage communities in the planning process – we would like to see efforts to engage with communities encompassing targeted inclusion of people with lived experience of homelessness and groups who are at higher risk of homelessness.

Our Crisis Skylight in Brent, London was involved in facilitating the establishment and work of Harlesden [Neighbourhood Forum](#), to help develop Harlesden Neighbourhood Plan, a document developed through engagement with the community to set out local aspirations for new development³⁰.

There is some evidence that areas with neighbourhood plans may be more accepting of housing development, with plans also commonly addressing affordable housing delivery.³¹

We would suggest that the Welsh Government reviews guidance on facilitating community involvement in Place Plans, to help ensure that people with lived experience of homelessness are effectively engaged.

We would also advise that community engagement in social housing development planning adopts the principles of co-production.

When planning engagement, facilitators should conduct an equality impact assessment to ensure that engagement sessions are accessible to all members of the community. We would suggest a range of different formats of engagement to ensure that everyone within the community is empowered to contribute. It is worth noting that online engagement sessions may not be accessible to those who are digitally excluded, whereas in-person sessions may be inaccessible for people with certain disabilities. To ensure meaningful and informed engagement, it is also important to make sure that plain language is used – the use of technical jargon is likely to lead to confusion and disengagement.

Conclusion

Increasing the supply of social housing is crucial to the success of the Welsh Government's Ending Homelessness Action Plan. We are in the midst of a housing crisis in Wales, with record numbers of us spending prolonged periods in temporary accommodation, unable to move on and rebuild a life beyond homelessness.

In this situation, it is imperative that the Welsh Government looks to make investment in building social homes at pace a clear priority and that this is linked to its ambition and plan to end all forms of homelessness.

Crisis welcomes the Welsh Government's clear acknowledgement of the need to ensure that planning supply effectively aligns with local housing need, particularly the needs of those who are experiencing homelessness. LHMA's, Rapid Rehousing Transition Plans and other strategies have a key role to play in this regard, but much work is needed to instil their effective implementation and realise their full potential. Continued work in developing this alignment is fundamental, as is effective monitoring of these systems. In

³⁰ Harlesden Neighbourhood Forum (2019) [Harlesden Neighbourhood Plan](#)

³¹ Parker, G. et al. (2020) [Impact of Neighbourhood Planning in England](#)

order to ensure everyone in Wales has a safe place to call home, the Welsh Government must not only drive forward with plans to build more social homes; it must also work to ensure these plans interconnect and dovetail with the needs of those who are experiencing homelessness in every local authority across the nation.

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Thank you for reading this response. For more information, please email Jasmine Harris, Senior Policy and Public Affairs Officer jasmine.harris@crisis.org.uk