

Cyflwynwyd yr ymateb i ymgynghoriad y [Pwyllgor Cydraddoldeb a Chyfiawnder Cymdeithasol](#) ar [Tlodi Tanwydd yng Nghymru](#)

This response was submitted to the [Equality and Social Justice Committee](#) consultation on [Fuel Poverty in Wales](#)

**FP10**

**Ymateb gan: Tai Pawb, CIH Cymru a Shelter Cymru | Response from: Tai Pawb, CIH Cymru and Shelter Cymru**

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## **‘Fuel Poverty in Wales’ – A perspective from the right to adequate housing**

Equality and Social Justice Committee | Senedd Cymru | November 2024

**Submitted jointly by ‘Back the Bill’ partners Tai Pawb, CIH Cymru and Shelter Cymru**



*This response is submitted jointly by the ‘**Back the Bill – the right to a good home**’ coalition partners, namely Tai Pawb, CIH Cymru and Shelter Cymru. ‘We’ and ‘our’ refers to the partner organisations.*

**Tai Pawb** works to advance equality and social justice in housing in Wales. We imagine a Wales where everyone has the right to a good home | [www.taipawb.org](http://www.taipawb.org)

**CIH Cymru** supports housing professionals to create a future in which everyone has a place to call home. We’re the professional body for people who work in housing, the independent voice for housing and the home of professional standards | [www.cih.org](http://www.cih.org)

**Shelter Cymru** exists to defend the right to a safe home. We help thousands of people each year in Wales by offering free, independent advice | [www.sheltercymru.org](http://www.sheltercymru.org)

### **The right to adequate housing**

The right to adequate housing means everyone has the right to live somewhere in security, peace, and dignity.

There are seven components to the right to adequate housing. These are:

- Legal security of tenure
- Affordability
- Habitability
- Availability of services, materials, facilities, and infrastructure
- Accessibility
- Location
- Cultural adequacy

The universal right to adequate housing **cannot be delivered overnight**. Instead, it is achieved through **progressive realisation**. **Progressive realisation** is a process that legally requires government to commit the maximum available resources, including land and finance, over time towards the realisation of a the right. And crucially, to take no measures that could contradict that right. This means that a right to adequate housing is a long-term, achievable policy goal.

## 1. Introduction

- 1.1 The [Back the Bill](#) campaign welcomes this opportunity to engage with Senedd Cymru's Equality and Social Justice Committee's inquiry into Fuel Poverty in Wales. Since 2019, we've campaigned to secure housing as a human right and built the evidence base on incorporating the right to adequate housing in Wales which, according to an opinion poll, is supported by **77% of people in Wales surveyed in 2020.**
- 1.1.1 The campaign applauds the Committee's desire to scrutinise progress on Fuel Poverty in Wales. Rather than focusing on the specific detailed questions, our response will explore strategic issues linked to the cause, impact and solutions of Fuel Poverty.
- 1.1.2 The initial part of our response focuses on who fuel poverty affects most. We link the need for a better approach to Fuel Poverty to decarbonisation. We further identify the benefits of incorporating the right to adequate housing into domestic law in addressing fuel poverty – and the shortcomings of the recently released White Paper into seeing correlation between the two.
- 1.1.3 We conclude our response by focusing on issues we feel are appropriate to consider in how to move forward in the battle against fuel poverty – aligned with the recent White Paper on 'Housing Adequacy'.

## 2. Fuel Poverty and its impact

- 2.1.1 Following the price cap increase of April 2022, up to 45% of all households in Wales [were estimated](#) to be living in fuel poverty. We know in Wales, 632 people die every winter due to cold homes. People most affected include households on benefits and lower incomes, older people, disabled people – as well as those suffering from long-term health conditions which require additional heating or energy consumption.
- 2.1.2 Poor housing conditions, including those linked to Fuel Poverty, can have adverse effects on individuals' physical and mental health, increasing use of the NHS, worsening self-reported health and reducing life expectancy. In a 2019 report, Public Health Wales estimated that poor housing costs the health service in Wales [£95m per year](#). According to the authors, investing £1 in improving warmth in vulnerable households could generate £4 savings due to reduction in hospital admissions for circulation and lung conditions. Another [study](#) by Rodgers et al. (2018) explored the health impact of improving housing conditions by carrying out an experiment in the south-west of Wales. The authors found that housing improved to a national quality standard by improving wall insulation or upgrading electrical systems can result in fewer hospital admissions of tenants aged 60 years old or more
- 2.1.3 A [recent study](#) in the USA found that improving energy efficiency and increasing ventilation in existing affordable houses could have positive effects on health outcomes and generate healthcare cost savings of an average of more than US\$200 per person per year.
- 2.1.4 It's clear Fuel Poverty doesn't just affect those most vulnerable in society, but all our services too. We welcome the Welsh Government's ambition to address Fuel Poverty by 2035 through the following non statutory targets:
- No households are estimated to be living in severe or persistent fuel poverty as far as reasonably practicable;
  - Not more than 5% of households are estimated to be living in fuel poverty at any one time as far as reasonably practicable;
  - The number of all households "at risk" of falling into fuel poverty will be more than halved based on the 2018 estimate.
- 2.1.5 Its currently unclear as to what progress has been made against these targets based on the latest Welsh government figures, however we believe for them to succeed, there needs to be a significant change.

### **3. Fuel Poverty and decarbonisation**

- 3.1.1 Housing adequacy, fuel poverty and decarbonisation are intrinsically linked. It's difficult to resolve one without the other two and we believe tackling these together provides the best opportunity for sustainable change.
- 3.1.2 In March 2021, the Welsh Government committed to achieving net-zero emissions by 2050, following its interim carbon reductions targets for 2030 and 2040 (63% and 89% reduction, respectively). Reducing energy usage and carbon emissions in housing is necessary to combat against climate change. In Wales, housing is one of the biggest emitters, responsible for 9% of all greenhouse gas emissions. The median energy efficiency score, which takes into account the housing impact on the environment based on expected CO<sub>2</sub> emissions, was 64 in 2021, which is equivalent to an EPC of band D; the lower the rating, the higher the environmental impact.
- 3.1.3 Inadequate homes tend to not be energy efficient, resulting in greater emissions of greenhouse gases and low levels of thermal comfort. Nicol et al explored a case study example focusing on the costs and benefits of improving a Welsh dwelling with an energy efficiency score of 21. Home improvements would include loft insulation, installation of double glazing and improvement of the heating system, which would result in increasing the energy efficiency score of the building to 57. Additionally, the CO<sub>2</sub> emissions of the dwelling and the annual fuel cost would decrease by 53% and 49%, respectively.
- 3.1.4 The Welsh Government has set ambitious targets for decarbonisation. Given the central role of housing to CO<sub>2</sub> emissions, it's challenging to see how they can be achieved, given the age and condition of Wales' housing stock, without radical investment and intervention. Without this investment Fuel Poverty will endure, particularly as energy and the welfare state remain as reserved powers.

#### **4. Housing in Wales- Fuel Poverty and a right to adequate housing**

- 4.1 In 2021, we welcomed the Welsh Government's commitment to introducing a right to adequate housing through its Programme for Government and the Co-operation Agreement with Plaid Cymru. In October 2024, while the Welsh Government brought forward a White paper towards delivering housing adequacy, we believe that the proposals contained within are insufficient to deal with the myriad, systemic challenges faced across the housing sector, including fuel poverty.
- 4.2.1 As Back the Bill partners, **we believe radical reform of the system is required in Wales if we are to properly address the housing crisis and the poor outcomes faced by too many people.** Incorporation of the right to adequate housing would increase investment, accountability, and require milestones and targets across a range of areas which would be scrutinised.
- 4.2.2 We believe the convergence of issues around fuel poverty, decarbonisation and adequacy, mean that the White Paper would have been an ideal vehicle to deliver the Welsh Government's ambitions around Fuel Poverty, driving investment in housing and technology change in relation to decarbonisation and measures around affordability. Sadly, this opportunity has been missed and it remains to be seen whether proposals around Fuel Poverty can be met. While incorporation of housing as a human right is about providing long-term legislation for housing, it does provide opportunities and a framework for addressing current challenges like Fuel Poverty in the short-medium term.

## 5. Conclusion

5.1.1 Our response has highlighted the link between the right to adequate housing, decarbonisation and fuel poverty. We firmly believe that without making this link at a legislative, strategic and policy level – it will not be possible to deliver the progress in these areas we want as a nation. The White Paper on ‘Housing Adequacy’ offers an opportunity to reflect on this – through stakeholder responses - and consider ways to lever in the changes and investment to end fuel poverty.

5.1.2 In conclusion, we’ve identified a number of questions we feel relevant to addressing fuel poverty in the context of the White Paper, which the Committee may wish to consider and address potential ways in which the two could support each other:

- The factors behind the proliferation of fuel poverty in recent years (despite a degree of discretionary state-sponsored or direct packages of support)
- How can we better align at a strategic level fuel poverty with decarbonisation?
- What opportunities would legal incorporation of a right to adequate housing present for people, and in particular tenants, who suffer from fuel poverty?
- How do we ensure that we have a long-term plan to address fuel poverty which isn’t undermined by the markets or discretionary government policies?