

HSHAWB 46 Cyngor Bwrdeistref Sirol Blaenau Gwent | Blaenau Gwent County Borough Council

Senedd Cymru | Welsh Parliament

Y Pwyllgor Llywodraeth Leol a Thai | Local Government and Housing Committee

Bil Digartrefedd a Dyrannu Tai Cymdeithasol (Cymru) | Homelessness and Social Housing Allocation (Wales) Bill

Ymateb gan: Cyngor Bwrdeistref Sirol Blaenau Gwent | Evidence from: Blaenau Gwent County Borough Council

Blaenau Gwent County Borough Council supports the underlying principles of this legislation. We share the Welsh Government's ambition to eradicate homelessness and believe that the housing crisis demands urgent collective action from across the public sector and its partners.

Our housing teams navigate a housing landscape which has experienced huge shifts in needs, demographics, supply and demand and legislative change. The environment in which they now operate is markedly different and more challenging than that of ten years ago. It is a workforce operating under extreme pressure, with expertise in dealing with increasingly complex cases at a time when there is a national shortage in accommodation.

As a Marmot council, we fully support the preventive and trauma informed emphasis of the legislation. The development of practical solutions to facilitate more and better preventive working are critical to achieving our Marmot ambitions and achieving successful homelessness prevention interventions.

However, this is fundamentally challenged by demand for affordable housing far outstripping supply, fuelled by the financialisation of housing and homes that has taken place. Increased rents in the private rented sector and the gap between the Local Housing Allowance rate compared to market rents further compound the issue. Taken together, these problems work to limit available options to prevent homelessness and housing crisis. The current housing market and system does not have capacity to accommodate existing demand for secure and affordable housing. We anticipate this legislation could increase further demand. We are mindful of the experiences in Scotland from legislative change which saw an exponential increase in demand.

Like all councils, the volume of households in temporary accommodation has been unprecedented in the last five years. We continue to work on ensuring that temporary accommodation provision is as suitable as possible given the overall demand and to limit the duration of temporary accommodation stays.

Since the Covid pandemic, and associated shifts in homelessness protections, our prevention rates have fallen. We believe the proposed legislation has potential to exacerbate this – at least initially - as the strain on resources due to direct access to homelessness services will reduce capacity in this area, potentially leading to increased reliance on temporary accommodation. In turn, the need to manage temporary accommodation placements will further limit the council's ability to focus on preventative measures.

We have seen a significant rise in costs associated with the provision of temporary accommodation. We anticipate there could be further increases under the revised model being proposed and there is a risk of additional financial pressures as a result.

We have some concerns about the intentionality test proposals. The Welsh Government has acknowledged that intentionality is rarely used. Our decisions around intentionality are extremely limited, due to the pro-active work done to engage people whose actions and circumstances can put their accommodation at risk. Intentionality is a tool that can help aid accountability and engage people who would otherwise lose their accommodation. It is used only when all other options have been exhausted and its removal could have an effect into other areas such as community safety and community cohesion.

In conclusion, the intent of principles of the legislation are supported. However, further assurance is required about the possible effect of increased demand in a system already under strain. This is also the case for ensuring the legislation provides the necessary tools to local authorities to meet our statutory duties and ensure those people in the greatest housing need are effectively and consistently prioritised in a landscape of increased demand and insufficient supply.
