

Communities, Equality and Local Government Committee  
CELG(4)-02-14 Paper 7

## **Communities, Equality & Local Government inquiry into the general principles of the Housing (Wales) Bill**

### **Community Housing Cymru Group response**

#### **1. About Us**

**The Community Housing Cymru Group (CHC Group)** is the representative body for housing associations and community mutuels in Wales, which are all not-for profit organisations. Our members provide over 155,000 homes and related housing services across Wales. In 2012/13, our members directly employed 8,000 people and spent over £1bn in the Welsh economy. Our members work closely with local government, third sector organisations and the Welsh Government to provide a range of services in communities across Wales.

#### **Our objectives are to:**

- Be the leading voice of the social housing sector.
- Promote the social housing sector in Wales.
- Promote the relief of financial hardship through the sector's provision of low cost social housing.
- Provide services, education, training, information, advice and support to members.
- Encourage and facilitate the provision, construction, improvement and management of low cost social housing by housing associations in Wales.

#### **Our vision is to be:**

- A dynamic, action-based advocate for the not-for-profit housing sector.
- A 'member centred' support provider, adding value to our members' activities by delivering the services and advice that they need in order to provide social housing, regeneration and care services.
- A knowledge-based social enterprise.

In 2010, CHC formed a group structure with Care & Repair Cymru and the Centre for Regeneration Excellence Wales (CREW) in order to jointly champion not-for-profit housing, care and regeneration.

## General Comments

CHC welcomes this opportunity to respond to the consultation on the Housing (Wales) Bill. The Bill is a comprehensive piece of legislation, covering a wide range of areas in the housing sector, which will affect housing associations both directly and indirectly. We have given our views on the individual principles of the bill in our written response below.

### 1. **A compulsory registration and licensing scheme for all private rented sector landlords and letting and management agents;**

CHC welcomes the intention of Welsh Government to improve private rented housing through a compulsory registration and licensing scheme. The private sector will play an increasingly important role in the housing system, with some research suggesting the private rented sector may reach 20% of the housing market in the UK by 2020<sup>1</sup>.

We recognise the opportunity this scheme brings to improve the quality and management of the sector, and will hopefully provide tenants with a greater choice of well-managed homes across Wales. In our view, the proposed scheme strikes a good balance between ensuring the management of privately rented properties meets a minimum standard, and the need to avoid burdensome regulation. As such, the costs and training requirements for private landlords are not so onerous that they are likely to be discouraged from letting their homes.

We also note the support from the Welsh Local Government Association for this scheme, and agree with them that the scheme will be essential in raising standards in line with the introduction of the ability of local authorities to discharge their homelessness duty to the private rented sector.

However, we do have some concerns over the implementation of the scheme, and whether it will fully address the problems faced by the private rented sector

Traditionally, the private rented sector has been extremely difficult to access for low income families, placing extra burden on the supply of social housing. The issues in accessing the sector have often related to a lack of security of tenure, and a lack of housing supply. These issues are not addressed by this scheme, but will be major barriers to improving the private rented sector in Wales.

### 2. **Homelessness legislation**

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<sup>1</sup> Pattison, B. et al (2010) Tenure trends in the UK Housing System

Registered Social Landlords have a key role to play in preventing and addressing homelessness, and we support the focus from Welsh Government, in policy and legislation, on preventing homelessness.

Co-operation, and partnership working between RSLs and local authorities is excellent in many parts of Wales, and RSLs also offer a host of services to prevent homelessness, such as family mediation, care and support for vulnerable groups, and hostel provision.

We have some concerns regarding the strengthening of the duty on housing associations to cooperate with local authorities in discharging their homelessness duty and the provision of accommodation for people who become homeless.

We are not in favour of increasing the duty upon the sector at a time where both a lack of housing supply and welfare reform, in particular the bedroom tax, present considerable barriers to both allocating and finding suitable accommodation, a challenge we face jointly with our local authority colleagues.

CHC commissioned research in partnership with WLGA, funded by Welsh Government, exploring the ways in which greater partnership working around homelessness can be fostered between housing associations and local authorities. Preliminary findings revealed much good practice across Wales, but some existing challenges, including confusion over roles and responsibilities and inconsistent practice.

The research recommended a number of actions across key areas for housing associations, local authorities and Welsh Government – these recommendations included:

- Development of local agreements setting out role, responsibilities and expectations of each partner in discharging the duty
- All parties to meet regularly to discuss effectiveness and appropriateness of common housing registers, common allocations policy and arrangements for nominations
- The Welsh Government to issue clear guidance on the application of housing associations' responsibilities under the Delivery Outcome which requires them to balance the need to sustain communities, as well as to give reasonable preference to those in greatest housing need or homeless.

We feel that much of what is desired through the strengthening of the duty may be reasonably achieved by the undertaking of the recommendations within this research.

### **3. A duty on local authorities to provide sites for Gypsies and Travellers where a need has been identified**

We recognise that gypsy and traveller communities represent one of the most socially excluded groups in Wales and we welcome measures which improve their entitlement to culturally appropriate housing and amenities.

This should extend to providing long-term settlement sites to ensure that families in this community are able to more effectively engage with health and educational services. The CHC Group would argue that in the context of a local authority's role in assessing and understanding housing demand in an area, authorities should be making adequate provision for those demands and we welcome this proposal.

### **4. Standards for local authorities on rents, service charges, and quality of accommodation**

CHC believes that it is important that all tenants in social housing have good quality homes and services, whether they live in a local authority or housing association home. RSLs have invested heavily in their homes, with many of them now having reached the Welsh Housing Quarterly Standard. We welcome moves for all social housing to achieve this standard.

### **5. Reform the Housing Revenue Account Subsidy system**

CHC welcomes the agreement in June 2013 between Welsh Government and HM Treasury to remove Wales from the Housing Revenue Account Subsidy, giving stock-retaining local authorities the opportunity to improve homes, and in some cases, build new affordable homes.

### **6. The power for local authorities to charge more than the standard rate of council tax on homes empty for over a year**

CHC welcomes the move to give local authorities discretion to charge more than the standard rate of council tax on empty homes, and in line with our response to the consultation on this issue, we strongly believe that funds raised by this policy should be ring-fenced for investment in housing and housing-related services.

### **7. The provision of housing by co-operative housing associations**

CHC supports the Welsh Government in its ambition to increase the supply of co-operative housing, which will extend the range of housing options available in Wales. We welcome this part of the bill, which will remove some of the current barriers to the development of co-operative housing, and we are hopeful that it will both increase supply and bring new finance into the sector.

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**Community Housing Cymru Group**  
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