

## **Agenda – Local Government and Housing Committee**

---

Meeting Venue:

**Committee Rooms 1 and 2**

Meeting date: 24 November 2022

Meeting time: 08.45

For further information contact:

**Manon George**

Committee Clerk

0300 200 6565

[SeneddHousing@senedd.wales](mailto:SeneddHousing@senedd.wales)

---

### **Pre-meeting (08.45 – 09.00)**

#### **1 Introductions, apologies, substitutions and declarations of interest**

(09.00)

#### **2 Homelessness – evidence session 2**

(09.00 – 10.00)

(Pages 1 – 47)

Allan Eveleigh, Assistant Director of Communities, North Wales Housing Association

Shayne Hembrow, Group Deputy Chief Executive, Wales & West Housing

Steven Bletsoe, Operations Manager Wales, National Residential Landlords Association

Matt Dicks, Director, Chartered Institute of Housing Cymru

Steffan Evans, Head of Policy (Poverty), Bevan Foundation

### **Break (10.00 – 10.15)**

#### **3 Homelessness – evidence session 3**

(10.15 – 11.15)

(Pages 48 – 67)

Jennie Bibbings, Head of Campaigns, Shelter

Jasmine Harris, Senior Policy and Public Affairs Officer, Crisis

Bonnie Williams, Director, Housing Justice Cymru



## **Break (11.15 – 11.30)**

### **4 Homelessness – evidence session 4**

(11.30 – 12.30)

(Pages 68 – 94)

Katie Dalton, Director, Cymorth Cymru

Thomas Hollick, Policy and Public Affairs Coordinator, The Wallich

Catherine Docherty, Assistant Regional Manager – Wales and South West,  
Salvation Army

Emma Shaw, Regional Manager Wales and South West, Homeless Service,  
Salvation Army

Jessica Hymus-Gant, Services Manager – Conwy S180, Denbighshire,  
Flintshire and Wrexham, Nacro

### **5 Papers to note**

(12.30)

(Page 95)

#### **5.1 Letter from Penarth Town Council in relation to community assets**

(Page 96)

#### **5.2 Letter from the Chair of the Legislation, Justice and Constitution Committee to the Minister for Finance and Local Government in relation to the Non-Domestic Rating (Chargeable amounts) Regulations 2022**

(Pages 97 – 98)

#### **5.3 Letter from the Chair of the Finance Committee to the First Minister in relation to the financial implication of Bills**

(Pages 99 – 101)

#### **5.4 Letter from the Minister for Finance and Local Government in relation to Corporate Joint Committees (CJCs)**

(Pages 102 – 103)

### **6 Motion under Standing Order 17.42(ix) to resolve to exclude the public from the remainder of the meeting**

(12.30)

- 7 Consideration of the evidence received under items 2, 3 and 4**  
(12.30 – 12.45) (Pages 104 – 109)
- 8 Consideration of the draft report on the Social Housing  
(Regulation) Bill LCM and SLCMs**  
(12.45 – 13.05) (Pages 110 – 122)

Document is Restricted



# 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.



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.



Local Government and Housing  
Committee,  
Welsh Parliament,  
Cardiff,  
CF99 1SN

## **Local Government and Housing Committee Inquiry into Homelessness**

### **Written Submission from the National Residential Landlords Association**

#### **1.0 About Us**

- 1.1 The National Residential Landlords Association (NRLA) is the leading voice in England and Wales for private sector residential landlords. It has almost 100,000 members making it by far the largest organisation in the sector. The membership owns and manages around 10% of private rented housing in England and Wales equating to half a million properties.
- 1.2 It provides training and support for landlords to ensure they fully understand their responsibilities and are equipped to provide good quality housing for their tenants. It also campaigns for policies that seek to improve the private rented sector for the benefit of tenants and good landlords alike.

#### **2.0 Executive Summary**

- 2.1 When determining how to tackle homelessness, often the solution many come to is to boost the number of social rented homes. This is easily said but is more challenging to achieve as slowing social housebuilding rates and soaring social housing waiting lists have shown. The private rented sector has a key part to play in housing those who may be at risk of homelessness, but key changes need to be made to ensure that the PRS can continue to stand ready to support local authorities in tackling homelessness as social housebuilding is increased in the long-term.
- 2.2 The NRLA is calling for key measures to be taken to increase the supply of private rented housing to ensure it meets demand, including:

- Support for landlords with their mortgage payments as interest rates increase to prevent landlords from leaving the market as they make a loss on the income from their properties.
  - Introducing an exemption from the 4% Land Transaction Levy on the purchase of additional homes to boost the supply of properties for longer term rent.
  - Ensuring that the long-term let market is not burdened by over-regulation, including ensuring it is not more appealing for landlords to let properties out short-term or for holiday let.
- 2.3 For the UK Government, the NRLA is also calling for them to make key changes to the welfare system such as restoring local housing allowance rates to the 30<sup>th</sup> percentile and removing the five-week wait for universal credit. This is to ensure that private rented housing is accessible to those at risk of homelessness.
- 2.4 In order to improve the progress made by local authorities against the Welsh Government's homelessness strategy, more should be done to ensure that landlords are made aware of private sector leasing schemes run by the Government and local authorities and to alleviate concerns from landlords around the schemes. The NRLA's research suggests the appetite to offer properties on the scheme is there if these can be addressed.

### **3.0 How Boosting the Supply of Private Rented Housing Can Help Reduce Homelessness**

- 3.1 In order to reduce homelessness and the reliance of local authorities on temporary accommodation, the lack of supply of homes in the private rented sector must be addressed. There is currently a significant mismatch between the supply of private rented housing and the demand for it. This is being made worse by the cost-of-living crisis and spiralling inflation.
- 3.2 The PRS plays a pivotal role in the delivery of housing to individuals and families across the country but yet, too often, it is viewed as the poor relation of housing tenures.

According to [research](#)<sup>1</sup> published by consultancy Capital Economics (commissioned by the NRLA) the private rented sector requires 230,000 new homes a year across the UK just to meet government housing targets. In the same research, it reveals Wales would need to create just under 9,000 new private rented properties each year to meet housing targets. It also highlights the stark fact that

---

<sup>1</sup> Challenges and opportunities for the private rented sector An assessment of the private rented sector and its role in meeting housing need in the UK. A report for National Residential Landlords Association (Feb,22)

the supply of privately rented housing has fallen by almost 260,000 in the UK over the past five years.

- 3.3 Yet there is a tendency on the part of many to concentrate on the shortage of affordable housing for purchase or on the lack of social housing across the UK. However, with 1.8 million new households set to emerge over the next decade, there is a need for greater supply across all housing tenures, and the private rented sector shouldn't be overlooked in any wider push to address this crisis.
- 3.4 A Freedom of Information request from the BBC and Shelter Cymru has revealed that there are 90,000 households on social housing waiting lists in Wales<sup>2</sup>, whilst government data shows that across all tenures just 5,659 new homes were built in Wales.. This means that simply having a target of building more social housing is not going to alleviate the homelessness crisis. It will take many years to increase housing capacity and build the homes needed to meet the demand from social housing waiting lists. A healthy private rented sector, with supply that meets demand, can help alleviate that pressure in the medium-term.
- 3.4 The most effective way to ensure the affordability of all types of housing, including that for private rent, is to ensure supply meets demand. The excess of demand over supply, as well as issues around cost of living and increasing mortgage rates, are driving rents up for tenants.
- 3.5 The NRLA does not think that there are currently enough of the right houses being built in the right places. This is both direct social housing from registered social landlords to supplement social houses and houses in the private rented sector, that landlords can buy and offer to tenants.
- 3.6 The Welsh Government guidelines offer very low percentage requirements for these types of houses in councils' Local Development Plans and councils always tend to adhere to the minimum requirements. Councils then take Section 106 funds as a way for developers to produce a lower number of affordable homes, justifying it by saying that the loss of these houses creates "investment" into an area that is spent on the communities.
- 3.7 Buy-to-let landlords will need support with mortgage payments to ensure tenants living in the PRS can remain in their homes. The unfortunate reality is if landlords who come to the end of a fixed-rate deal in 2023 or 2024 must pay mortgage rates that are four percentage points higher than they are currently, more than half will

---

<sup>2</sup> BBC News, *Housing: Welsh family 'may have to move to Scotland'*. Available at: <https://www.bbc.co.uk/news/uk-wales-63373590>.

be unable to re-mortgage unless rents are raised<sup>3</sup>. The Welsh Government should provide further mortgage relief and help landlords with their mortgage costs.

- 3.8 At a time of rising interest rates, the Welsh Government should seek to incentivise landlords into the private rented sector, especially landlords who add to the net supply of housing. It could do this by introducing an exemption from the 4% Land Transaction Levy on the purchase of additional homes to boost the supply of properties for longer term rent. Research has pointed to the importance of off-plan house purchases which private landlords have traditionally been good at providing. To be eligible, the NRLA proposes that landlords would need to prove that the property is for long-term rent to prevent them from being tempted into the short-term or holiday let market.
- 3.9 The Welsh Government also needs to ensure that the short-term let market is not less regulated than the long-term let market. If the key aim is to ensure the right number of homes is available for people to live in, it should not be more appealing for a landlord to offer their home up for short-term let than to have a tenant in their property long-term. We would therefore caution against overregulation of the long-term let market.
- 3.10 NRLA thinks that a strongly supported PRS could make a massive impact on eradicating homelessness.
- 3.11 Additional changes to the welfare system would also help improve the affordability of housing, especially for those on the lowest incomes and those at risk of homelessness. Whilst we appreciate that this falls outside the remit of the Welsh Government, we would call for key changes to be made to benefits to make them suitable during the current cost-of-living crisis. This would include:
- Restoring the link between the Local Housing Allowance and the 30<sup>th</sup> percentile of local rents to ensure that LHA rates represent the true value of rents in a local area.
  - Ending the five-week wait for universal credit.

#### **4.0 The Government's Progress on Ending Homelessness in Wales: A high level action plan 2021-2026**

- 4.1 Local authorities have been increasingly reliant on temporary accommodation to support those in need of a home with a lack of socially rented housing available.

---

<sup>3</sup> The Telegraph, *Buy-to-let landlords face ruin as mortgage rates rocket*. Available at: <https://www.telegraph.co.uk/property/buy-to-let/buy-to-let-landlords-face-ruin-mortgage-rates-rocket/>

The NRLA believes that there is a role for the private rented sector in offering more long-term housing for those at risk of homelessness. Many local authorities already run private sector leasing schemes through which private landlords can lease their properties to the council. Yet, many landlords remain unaware of these schemes or unsure about their advantages.

- 4.2 We want to make it as easy as possible for landlords to use these schemes if they wish to. There are many landlords out there who want to provide housing to vulnerable groups but lack the knowledge about how to, or their benefits. This is highlighted in our Quarter1 2020 report<sup>4</sup> where the NRLA asked landlords about their attitudes to Guaranteed Rent Schemes:
- Yes - I think there would be interest and support among landlords for such a scheme (23.5%).
  - “No - There is no way I (or landlords generally) would be interested in this idea” (28.0%)
  - “Landlords would be interested but depends on more detail” (48.5%).
- 4.3 As the survey indicates, the majority of landlords would be willing to consider a Guaranteed Rent Scheme provided the package is sufficiently attractive.
- 4.4 The main attractions for those landlords who expressed a positive view were:
- A guaranteed income for landlords (88.6% of landlords saw this as a key reason)
  - This was closely followed by the “hassle-free” nature of letting property under this model (73.9%).
- Note also that 60% of those landlords in this group agreed with the statement that the model presented an opportunity to “use my property for social good – and that is a good thing”.
- 4.5 Looking at those landlords who are more sceptical about the initiative:
- Loss of control was seen as the major drawback (88.5% of landlords in this group cited this as a reason).
  - The risk of major property damage and anti-social behaviour were not far behind (82% and 78.8% of landlords respectively).
- 4.6 Many landlords (71%) were also reluctant because they feared losing control of their asset and wondered whether they could take back possession of the property in a timely manner.

---

<sup>4</sup> NRLA, *State of the PRS – 2020, Quarter 1 report*. Available at: <https://www.nrla.org.uk/research/quarterly-reports/2020/qtr-1>



24BA, City Road  
Cardiff, CF10 4RG  
Telephone: 0300131 6400  
Email: [info@nrla.org.uk](mailto:info@nrla.org.uk)  
[www.nrla.org.uk](http://www.nrla.org.uk)

- 4.7 There is an opportunity to better utilise the private rented sector as part of the solution to housing challenges, but Government policy at both national and local level needs to recognise this and help to address landlords' concerns about the higher risks.

## Homelessness evidence session terms of reference

### CIH Cymru consultation response

This is a response to the Senedd Housing and Local Government Committee's call for views on the proposed terms of reference for forthcoming work on homelessness and rough sleeping.

#### *Introduction*

Addressing homelessness, and its causes, has been a constant feature of the work of the housing profession. The profile of this work has been raised during the pandemic and this is continuing as we move into a post-pandemic reality.

Alongside many other organisations across the UK we have raised concerns around affordability. The rising unaffordability of housing is set to continue due to ongoing restrictions in the benefits system coupled with inadequate local housing allowances, as well as a chronic shortage of social and affordable housing supply. [Our latest cost of living report](#) outlined that 69% of private renters in Wales have a rent shortfall. Alongside this is the possible implementation of austerity measures and cuts to public services. This at a time of rising inflation will increase the risk of homelessness for many in Wales. It may also further reduce the available resources available to meet a predicted rise in demand for housing advice and affordable housing putting strain on a system that is already under significant pressure. There may also be an increase in demand for temporary accommodation at a time where move on is difficult due to a lack of suitable affordable accommodation.

We strongly welcome the invitation to provide our views on the terms of reference for the committee's work on homelessness and rough sleeping together with views on the current situation in Wales.



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

Our Local Authority Members are highlighting both a lack of temporary accommodation and suitable accommodation to move people onto. In some areas there is now a waiting list for temporary accommodation. A fact highlighted by one Local Authority support provider where a rough sleeper has been waiting for over 2 weeks to secure a place in temporary accommodation. Other Local Authorities are negotiating longer stays with friends and family to avoid placing in B&B whilst a space in leased accommodation becomes available. Often this is in overcrowded homes which can exacerbate family relationships.

Despite best efforts to avoid their use some Local Authorities are having to utilise hotels or B&B accommodation to meet their statutory duty to provide temporary accommodation. Yet for many this accommodation is not suitable. In many cases, families are sharing one room with little to no space for children to play or study. Single people may need to share bathroom facilities or are asked to leave their accommodation during the day. The lack of cooking facilities or places to adequately store food means that many are reliant on takeaways which as a time of rising unaffordability is negatively impacting their ability to effectively budget or save.

Some of our Local Authority members utilise temporary accommodation that is leased from private landlords or partner RSL's will provide accommodation to be used as temporary accommodation. Though this removes stock from allocation schemes and can impact the time spent in temporary accommodation. There are also concerns around the increasing issue of fuel poverty for those placed in private leasing schemes that are not as energy efficient as other accommodation. Our [UK Housing Review 2022](#) showed that 23% of households in private sector homes are living in fuel poverty. In addition our [decarbonisation of the private rented sector report](#) , found that housing stock in Wales is the oldest in the UK. If we are to continue to use leased properties as a more suitable offer of temporary accommodation, then we need to look at decarbonising the private rented sector to minimise the risk of fuel poverty especially as energy costs continue to rise.





Our Local Authority members are seeing a significant increase in the number of single person households accessing temporary accommodation. Yet in many areas there is a significant lack of affordable one bed accommodation to move them onto resulting in long stays in temporary accommodation. The increasing support needs for single people is also impacting move on and length of stays in temporary accommodation.

CIH Cymru's [Tyfu Tai Cymru research project](#) has carried out a series of surveys of staff working local authority housing and homelessness teams at different points through the two-year period of the Covid pandemic.

The [most recent Joining the Dots survey highlighted](#) the following impact of the huge demand currently being placed on local authority teams, exacerbated by the cost of living crisis and the impact of the Ukrainian refugee crisis:

- There is a need to continue the multi -agency work achieved in the pandemic in supporting individuals placed in temporary accommodation. This collaborative working between agencies will ensure that the right support is in place for those individuals placed in temporary accommodation.
- There is an unmet need for temporary accommodation specifically for 18-24 year olds especially those with complex support needs
- There is an increased awareness of the support needs of individuals with temporary accommodation being developed to support specific cohorts which has led to better engagement with the support provided
- This better knowledge of individuals support needs has led to an awareness of a lack of provision specifically for 16-24 year olds with complex needs and individuals with poor mental health.
- The greatest concern for participants was the lack of temporary accommodation and the need for more permanent solutions for people seeking accommodation.

The evidence from this report together with experiences of front-line housing professionals highlights not only a need for more temporary accommodation with

adequate support but also more adequate affordable housing for people to move into.



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

Individuals placed in hostels or other types of supported temporary accommodation can face increased costs. Families can have increased transport costs to access schools, or to access childcare to enable them to keep working. There are also concerns around isolation and the impact this can have on an individual's mental health and wellbeing. This is especially the case for those individuals who are provided with temporary accommodation in another part of the Local Authority area to where they have community links. If this is in a rural area it could be extremely difficult to access this community support if transport links are not adequate.

As previously mentioned, some individuals and families are being placed in B&B. Often there is little to no access to cooking facilities with many reliant on takeaways. This is costly and often not the most nutritious food. Families in B&B and hotels often are in the same room and this can have a negative impact on family life and relationships.

Many individuals and families also face digital exclusion whilst living in temporary accommodation as access to free Wi-Fi is limited. If there is not a library close to the accommodation many are not able to use digitised services as not everyone has access to an internet enabled mobile phone.

With the duration of time spent in temporary accommodation families and individuals can become part of a new community, sending children to new schools, joining new medical practices, and taking part in general community life. These new ties to an area can make families and individuals and less likely to take up an offer of permanent accommodation in another area, changing schools, medical practices and getting to know another community.



To mitigate some of the negative impacts of a stay in temporary accommodation some Local Authority members, in partnership with their support providers, provide diversionary activities. This enables individuals and families to socialise and take part in activities away from their temporary accommodation. Other Local Authority partners highlighted the fact that new family temporary accommodation is now being designed to meet the play and study needs of children. There is a need to replicate this good practice pan Wales to mitigate, minimise and ultimately prevent negative impacts of residing in temporary accommodation, often for long periods of time.

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

The use of B&B and hotels can have a significant impact on Local Authority budgets as often this cost is not fully covered by Housing Benefit. In some cases Local Authorities are also having to subsidise service charges as these are also not covered by housing benefit. Often these service charges are to cover the cost of gas and electric. Accommodation providers are reluctant to put the service charges up but with soaring energy costs they may have no choice worsening the financial burden for Local Authorities.

[The final Tyfu Tai report](#) on the experiences of frontline Local Authority Housing Professionals highlighted the following impacts:

- Staff are reporting increased pressure from increasing demand for temporary accommodation, the cost-of-living crisis, and a sustained heavy workload. Services are becoming overstretched which is having a detrimental impact leaving many staff feeling exhausted.

---

*It's just wearing. There is ceaseless demand, not enough solutions.  
Even when we arrange move on it does not ease pressure as  
demand is constant.*

---



- The report highlighted a decrease in confidence in health and housing partnerships with 58% confident in these partnerships down from 67% confidence before the pandemic.
- It was concerning to find that 75% of staff felt that their mental well being had decreased since January 2020.
- The report also highlighted the priority of Local Authorities to develop more social and affordable housing either through the Local Authority or by providing support to RSL partners

---

*“Increase the net number of homes available, including new build by the Council and conversions of redundant commercial property into homes.”*

---

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

We strongly support the Welsh Government’s target of delivering 20,000 low carbon social homes and this is also a priority for our members.

Whilst we welcome the record levels of investment into Social Housing Grant - the Welsh Government reasserted its commitment to the 20,000 low-carbon social homes target in its 2022/23 Budget, providing £965 million of indicative funding for social housing grant over the three years 2022/23-2024/25 – supply chain and inflationary pressures are proving a challenge in respect of that 20,000 target.

Our Tyfu Tai Cymru report in November [last year on supply chain pressures](#) last year revealed that

- Almost 90% of social landlords are having significant or moderate issues with supply chains for building new homes, day to day maintenance and retrofitting



- Increased prices of 30%-40% were identified across a range of materials including timber, steel, concrete, and fencing.
- 96% of respondents reported that one of the main impacts has been on time-delays

And this was the picture before increased inflationary and supply chain pressures caused by Russia's invasion of Ukraine. So, ambitions stated a year ago face much bigger barriers than they did back then, particularly when you add on top of the 20,000 new homes target, the Welsh Government's ambition to decarbonise the social housing stock in Wales by 2033, whilst keeping rents affordable in a deep cost of living crisis.

There is also a need as part of developing new homes to look at action around land costs -recognising that although building as close as possible to existing communities should be desirable the costs of doing so often make it prohibitive. We also need to ensure that the types of homes we build are seen as just as important as the number we deliver.

Our [Tyfu Tai Cymru research report – Right Place, Right Home, Right Size](#), published in August 2021 in collaboration with Social Housing providers in North Wales found that flats, particularly first floor flats were particularly undesirable. Yet flats are often included on developments to ensure they are viable. This creates a tension between what housing can be delivered and what may be seen as an attractive housing prospect.

There is a need when drafting local development plans to look at the way housing need is being calculated. [Our Tyfu Tai Cymru Report time to re-focus](#) established:

- There is a need to refocus the social housing grant so it can be allocated where severe housing need is evidenced. With the new housing then being allocated to those in most housing need
- A review of how effective the information on housing demand is when being used to guide the types of new social and affordable housing. One rural area



stated that there were huge demands for one bed accommodation resulting in long stays in temporary accommodation. This further raises the question around effectively establishing housing need when drawing up development plans.

Developing new homes is one part of the solution but this is often a long-term solution due to development timescales.

CIH Cymru is calling on the UK Government to restore the local housing allowance (LHA) rates to at least the 30th percentile and return to annual uprating because at current levels it makes the private rented sector unaffordable for many of the families and individuals in temporary accommodation.

Recent research from the Bureau of Investigative Journalism<sup>1</sup> found that on average only 2% of two bed houses available for Private Rent in Wales were covered by current LHA rates. The unaffordability of the Private Rented sector is making it inaccessible for many households in Wales negatively impacting on the length time spent in temporary accommodation.

In the medium term we to make better use of our existing stock. Rightsizing forms an important part of making best use of our existing stock. Our work in North Wales focussed on how housing providers can better help people who may be in homes that are too small or too large for their needs. This work also highlighted a need to fully understand the true housing need of the area.

There is also scope to do more around empty Homes in Wales. The Houses into Homes Loans funded by Welsh Government have been a useful tool in assisting owners in bringing empty homes into use. However, for long term properties the £35,000 loan is not sufficient especially considering rising cost of materials. Also it is often not the lack of funds to do the work that prevents an empty home being brought back into use such as unforeseen legal issues to an emotional connection to the property.



The Tyfu Tai Cymru report, developed in collaboration with final year Housing Studies students from Cardiff Metropolitan

University, titled - [Community-led approaches to empty homes](#), offered additional solutions to empty homes:

- Setting up housing co-operatives creating affordable homes by bringing empty homes back into use for the community.
- There is a strong link between collaborative work with communities and effective regeneration strategies that can turn empty homeless not liveable homes benefitting the community.

---

<sup>1</sup>The Bureau of Investigative Journalism, Lack of affordable lets leaves families with little left to live on: <https://www.thebureauinvestigates.com/stories/2022-10-07/lack-of-affordable-lets-leaves-families-with-little-left-to-live-on>

There is scope to explore these solutions alongside the existing Houses to Homes loans scheme to increase the number of empty homes being brought back into use.

The private sector leasing scheme funded by Welsh Government is going well in some areas with more and more landlords coming forward to take part. Yet in other areas landlords are more reluctant to sign up to the scheme due to the difference between the guaranteed rent and their mortgage costs.

Whilst there is scope to further expand the scheme in some parts of Wales there is a need to look at the level of guaranteed rent in order to increase the number of landlords signing up to the scheme. This scheme is a valuable part of the solution to increase the supply of adequate affordable housing for families and individuals to move onto reducing lengths of stay in temporary accommodation.

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

We are encouraged with some of the work already completed in delivering the high-level action plan. We are especially pleased to see:



- A clear commitment to put the right to adequate housing on the statute during this Senedd term. We welcome this commitment from the minister and will provide our full support in ensuring this ambition is met.
- We are pleased that the green papers publication is imminent. This will provide a further opportunity for us to support Welsh Government in their ambitions in developing an equitable legislative framework as well as advancing our ambitions in seeing a right to adequate housing in Wales.

We also have some concerns around some of the asks of the action plan:

- The timescales for the publication of the rapid rehousing plans are not seen as realistic by some of our Local Authority members due to ongoing service pressures and increasing workloads. Their successful implementation is dependent on funding and there are calls from some members for more flexibility with funding around support. Not all support needed will be housing related but still invaluable for the continued wellbeing outcomes of families and individuals.
- With the pressure on supply for affordable housing in the social housing sector it is becoming increasingly difficult to identify suitable properties for housing first a key aim of the action plan. Even when our RSL partners utilise current stock and existing turnover there is often not enough suitable homes to meet demand.
- Whilst there is an ongoing commitment for Welsh Government to meet the target of 20,000 energy efficient affordable homes in this parliamentary term there are concerns that this is a difficult ask given the current financial climate and ensuring existing stock meets decarbonisation requirements. We will continue to support our members and would work with Welsh Government to see that both these targets can be met.





There is a clear need for more communication around the delivery of the action plan so that partner agencies can effectively evaluate its implementation. Local Authority members expressed disappointment at the disbanding of the homelessness network as this is seen as the ideal environment for updates and discussion of progress being made on the action plan.

### **About CIH**

The Chartered Institute of Housing (CIH) is the independent voice for housing and the home of professional standards. Our goal is simple – to provide housing professionals and their organisations with the advice, support, and knowledge they need to be brilliant. CIH is a registered charity and not-for-profit organisation. This means that the money we make is put back into the organisation and funds the activities we carry out to support the housing sector. We have a diverse membership of people who work in both the public and private sectors, in 20 countries on five continents across the world. Further information is available at: [www.cih.org](http://www.cih.org).

November 2022

## Housing and local government committee inquiry into homelessness

The Bevan Foundation is Wales' most influential think-tank. We aim to end poverty and inequality by working with people to find effective solutions and by inspiring governments, organisations and communities to take action. We are grateful for the opportunity to submit written evidence to the Housing and Local Government Committee's inquiry into homelessness. For the past 18 months the Bevan Foundation have been working on a project to further understanding of the link between the Local Housing Allowance (LHA) and Homelessness in Wales, and to develop solutions. Our response draws on this work, and addresses each of the terms of reference set out in the consultation document in turn.

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

Wales is in the midst of a housing crisis. The number of people presenting themselves to homelessness services and the rate of rough sleeping, have been gradually increasing in recent years.<sup>1</sup> These pressures have worsened significantly during the Covid-19 pandemic, as households have struggled with stagnating wages and rising inflation.<sup>2</sup> It is perhaps not surprising that in this context that the Bevan Foundation have become aware of a number of problems within the temporary accommodation system.

First, there is not a sufficient supply of temporary accommodation to meet current demand. Research undertaken by the Bevan Foundation over the summer of 2022 revealed that the shortage of temporary accommodation is so acute that some local authorities are asking tenants who have been issued with an eviction notice to remain in the property until they have been issued with a court order to leave, with the local authority paying for their legal fees.<sup>3</sup>

Second, there is concern as to the quality of some temporary accommodation. The extensive use of holiday accommodation such as hotels and static caravans puts significant pressure on homeless families. Such facilities often lack adequate cooking facilities forcing families on already low incomes to spend more on food or rely on low

---

<sup>1</sup> StatsWales, *Households for which assistance has been provided by outcome and household type*. (2021, December 16) available at - <https://statswales.gov.wales/Catalogue/Housing/Homelessness/householdsforwhichassistancehasbeenprovided-by-outcome-householdtype>; and StatsWales, *Rough Sleepers by local authority*. (February 2020) available at - <https://statswales.gov.wales/Catalogue/Housing/Homelessness/Rough-Sleepers/roughsleepers-by-localauthority>

<sup>2</sup> The Bevan Foundation, *Snaopshot of poverty in summer 2022*. (July 2022) available at - <https://www.bevanfoundation.org/resources/a-snapshot-of-poverty-in-summer-2022/>

<sup>3</sup> The Bevan Foundation, *Wales' Housing Crisis: an update on the private rental market in summer 2022* (September 2022) available at - <https://www.bevanfoundation.org/resources/wales-housing-crisis-summer-2022/>

quality meals. There are further concerns about some families living in cramped and crowded conditions.

Third the extent of the pressure placed on the system may be undermining the quality of some of the services that are in place to support households. This includes both services to support people living in temporary accommodation and some of the services that are in place to prevent households from having to move into temporary accommodation in the first place. For example, the soon to be implemented Renting Homes (Wales) Act 2016 will see landlords be required to provide tenants with a six month notice period when issuing a no-fault eviction. This legislative change should provide local authorities with a significant period of time to support low-income tenants into alternative permanent accommodation. However, our research has revealed that many are unlikely to start providing tenants in such situations with significant levels of support until 56 days before eviction, the time they are legally required to do so under the Housing (Wales) Act 2014.<sup>4</sup>

### The impact living in temporary accommodation has on individuals and families

As part of our work looking at the relationship between the LHA and homelessness the Bevan Foundation has heard from people living in temporary accommodation across Wales about their experiences.<sup>5</sup> One key message that emerged is just how difficult it is for many households to find permanent accommodation once they are in temporary accommodation.

We heard from people living in temporary accommodation and from staff working within the sector that many private landlords and letting agents are extremely reluctant to let to people in temporary accommodation due to preconceptions and prejudices held about homeless people. This challenge is made even more acute given that most people living in temporary accommodation do not have access to a referee or a guarantor, a precondition of securing much of the accommodation that is available within the private rental sector.

These factors mean that people are often left to live in temporary accommodation for significant periods of time. Single adults under 35 were felt to be at particular risk of being trapped in such a position. This was thought to primarily be the result of the single adults under 35 only being entitled to the LHA shared accommodation rate.

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

As already noted, the ongoing demand for temporary accommodation is having a severely detrimental impact on local authorities, their partners and communities. The shortage of available temporary accommodation is placing a significant strain on many public services and affecting the ability of public bodies and partner organisations to both prevent homelessness and support homeless households.

---

<sup>4</sup> ibid

<sup>5</sup> Bevan Foundation, *Wales' Housing Crisis: making the LHA work for Wales* (March 2022) available at - <https://www.bevanfoundation.org/resources/wales-housing-crisis-making-the-lha-work-for-wales/>

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

The Bevan Foundation have identified a number of short-, medium- and long-term actions that could be taken to reduce the use of temporary accommodation and the pressures faced by the homelessness system more broadly. These can be grouped together into five key ideas. More detail on each of the recommendations can be found in our recent publications.<sup>6</sup>

### 1. Reform the LHA

The gap that has developed between the LHA and rents is a key driver of homelessness in Wales. It both pushes households into homelessness and traps households in temporary accommodation as households are unable to find a property to rent at a rate covered by LHA.

Many of the key levers to reforming the LHA are to be found at Westminster. Actions that should be taken by the UK Government include uprating the LHA annually to reflect rising rents and scrapping the shared accommodation rate for under 35s. There are actions that could be taken at a Welsh level however that would improve the system. For example, the Welsh Government should mandate all landlords in Wales to share how much they charge for rent on an annual basis. This data should be collected and processed by Rent Smart Wales as part of their broader activities. This would ensure that if the LHA was uprated it was done based on more accurate data of the market in Wales.

### 2. Closing the gap between rents and the LHA

Even allowing for the issues with the LHA system there are more actions that could be taken at a Welsh level to try and close some of the gap between rents and the LHA.

For instance, all Welsh local authorities should spend their DHP allocation in full. To support this the Welsh Government should guarantee local authorities that their DHP pot will not fall below a designated floor. There is also a need for the Welsh Government to regularly review the support provided through its Leasing Scheme, amending the scheme as necessary to assist as many low-income tenants as possible.

The forthcoming white paper on rent caps provides a further opportunity to consider approaches that could close the gap between LHA and rents, reducing the pressure faced by low-income tenants. The white paper should focus on the needs of low-income tenants. Focusing on rents at the upper end of the market is unlikely to make a difference to the challenges facing low-income tenants.

### 3. Protecting tenants

There is a need for the Welsh Government to take further action to protect tenants. Unfair landlord practices can often be a cause of homelessness, with low-income tenants struggling to find the money to pay large deposits or being unable to satisfy credit checks

---

<sup>6</sup> ibid

or guarantor requirements. The Welsh Government should introduce legislation that prohibits such requirements where they are unfair.

In the interim the Welsh Government should work with local authorities to explore how they can support more low-income tenants meet landlord requirements. For example, the Welsh Government should explore how its Leasing Scheme could be developed to allow local authorities to act as guarantors for low-income tenants.

It is also important that Welsh local authorities are provided with the resources so that they can start the process of providing support to tenants who have been issued with an eviction notice at the beginning of the six-month period, rather than wait until the final two months of the notice period. Providing local authorities with the ability to do so could reduce the pressures placed on the temporary accommodation system.

#### 4. Increasing the supply of social housing

In the medium to long term, increasing the supply of social housing is crucial if we are to ease the demand for temporary accommodation. It is therefore imperative that the Welsh Government significantly increase its investment in the construction of new social homes.

Even if the Welsh Government were to adequately invest in the construction of new social housing such investment would take a number of years to come to fruition. Given the scale of the homelessness crisis in Wales today there is a clear need for speedier developments. We therefore believe that the Welsh Government should explore, and support means of increasing social housing stock quickly, including purchasing empty houses and the use of modular construction techniques at scale.

In the longer term we believe that the Welsh Government should undertake a review to assess the challenges and opportunities that would be presented by devolving the housing element of Universal Credit and Housing Benefit.

#### 5. A Welsh Home Guarantee

We believe that the Welsh Government should establish a Welsh Home Guarantee in partnership with local authorities. Such a guarantee would see homeless people or people who are at risk of homelessness provided with a comprehensive package of assistance that is tailored to the needs of the household. We envisage that the guarantee would be delivered by local authorities but with Welsh Government providing adequate resources to enable them to do so.

Among the actions we recommend that local authorities should be permitted to take with the support of the Welsh Government under the guarantee are:

- Act as a guarantor on a lease.
- Provide a reference for prospective tenants.
- Commit to providing a DHP to cover any rent gap for at least the first twelve months of a new tenancy, with this support rolled over where appropriate.
- Work with people to ensure that they receive any financial support that they are entitled to. Such support includes the Discretionary Assistance Fund, the Council Tax Reduction Scheme and the Winter Fuel Support.

Providing such support could significantly increase the money that low-income renters have in their pockets, easing the impact of the rent gap, whilst also addressing some of the issues that currently exist with regards to landlord practices.

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

Whilst supportive of the actions set out in the Ending Homelessness in Wales: A high level action plan 2021-2026 we are increasingly concerned that the pressure currently being placed on the homelessness system is such that many local authorities and partner agencies are operating in "firefighting mode". This means that the focus of various support agencies has shifted to providing support to those in most acute need. If resources are limited and demand is increasing, we think this is entirely rational approach for service providers to adopt. The concern is, however, that when services are provided in such a way many of the broader aspirations set out in the action plan are viewed as less of a priority, leading to the risk of them not being implemented in full.

## CARTREF YW POPETH HOME IS EVERYTHING



Shelter Cymru's response to the Local Government and Housing Committee consultation on Homelessness and Temporary Accommodation.

Short Written Submission – November 2022

About Shelter Cymru

Shelter Cymru exists to defend the right to a safe home, because **home is everything**. We help thousands of people across all of Wales every year who have been affected by the housing emergency by offering free, confidential and independent advice. When necessary, we constructively challenge on behalf of people to ensure that they are properly assisted and to improve practice and learning.

We work with people who use our services as equals. We provide information, advice and support to help people identify the best options to prevent homelessness, to find and keep a home and to help them take back control of their own lives.

We fight the devastating impact of the housing emergency has on our people and communities with campaigning, advice and support – and we never give up.

### **Introduction**

Shelter Cymru welcomes the opportunity to respond to this consultation regarding the use of temporary accommodation (TA) in Wales. We have prepared this short written submission, as requested, in advance of the evidence giving session on the 24th November.

Our thoughts have been shaped by our extensive housing advice casework across Wales and first-hand experience of working with households who are currently being accommodated in TA by local authorities.

Our response considers TA to include all forms of short-term accommodation used by local authorities to fulfil their homelessness duties. This includes B&Bs, hotels, refuges, hostels, and short term private and social lets. This encompasses a wide range of accommodation settings, some of which are more suitable than others.

Latest available figures show that 8,545 people were living in TA at the end of August 2022, 2,515 of whom were children. We are watching these numbers rise on a month by month basis as the underlying issue of housing supply and affordability is further fuelled by the cost of living crisis.

# CARTREF YW POPETH HOME IS EVERYTHING



Homelessness is increasing as a proportion of our casework: between August 2021 and August 2022 we saw a 41% increase in numbers seeking help due to homelessness.

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

People will have a vastly different experience of being in TA depending on its nature and the facilities and support provided. Self-contained accommodation with full cooking and washing facilities is what people we help prefer.

We have seen cases that cause us great concern, both in terms of the quality of accommodation provided and its suitability for the needs of that particular household. We have seen evidence of appalling, unsanitary living conditions; heard from pensioners about the practical struggles of having just a kettle to prepare meals with; listened to families with young children telling us how unsafe they feel sharing facilities with strangers; and seen the anguish faced by people accommodated miles away from family and other support networks.

We are extremely concerned about any relaxation of suitability requirements as proposed by the Welsh Government's interim homelessness measures and have responded to this separately. We totally appreciate the extremely difficult circumstances in which local authorities are having to work, and that placements in poor quality accommodation are made as a last resort. We do however think that there are opportunities to do things better.

Suitability of accommodation is not just a result of facilities or location. In our response to the consultation on interim measures we also highlighted the numbers of households falling out of TA, i.e. leaving without a planned move into a more permanent setting, some as a result of eviction. Between April 2021 and March 2022 a total of 14,474 people were placed in TA, joining 6,111 people who were already in TA at the end of March 2021. Over the same period 6,274 people moved into long-term accommodation, while at the end of March 2022 there were 7,779 people in TA. This leaves a gap of 6,532 people who must have left TA for other reasons than move-on into a long-term home. Negative outcomes are not inevitable – some people may be self-solving their homelessness – but our casework clearly tells us that a lack of suitable, person centred support, is a strong contributory factor in many of these cases, with some people being evicted into street homelessness because their support needs have not been met while in TA.



# CARTREF YW POPETH HOME IS EVERYTHING



Our biggest worry is the emergence, since the early days of the pandemic, of TA waiting lists being operated by some local authorities. Very much a symptom of the current unprecedented demand against limited supply, we are aware of households who are owed a legal duty by the local authority being told that they will have to wait for their turn on the list. We cannot stress strongly enough our disappointment in this systemic failure to comply with the provisions of the Housing (Wales) Act and the weakening of the rights it results in for households facing homelessness. We know that the Welsh Government shares our concern and has stressed in the new supplementary guidance to local authorities the unlawful nature of such lists, but our concerns remain while they are in operation.

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

We've already talked about the practical issues of living in poorly equipped accommodation, unable to cook your own food, or wash clothes without a trip to a laundry or relying on the support of family and friends. In some cases we have seen that support is up to 40 miles away and accessible only via sporadic public transport.

It is equally important to consider the ongoing stress of living in this situation and the impact of not knowing what comes next and when. The people we see talk about their life being on hold and a feeling of being in limbo. Employment opportunities, education, relationships, and health and wellbeing are adversely affected.

Many are living without the usual freedom of being an adult citizen, are not allowed to have visits from friends and family, have been separated from beloved pets and may even have to abide by an evening curfew as early as 6pm with any incursion on these rules potentially carrying the threat of eviction. People have told us about their feelings of loneliness and isolation and the limits it places on their ability to socialise, find or keep work, and access services.

Through our casework we've also heard about the financial impact of living in TA. Rents can be expensive and for some the only way to afford them is by claiming the housing element of universal credit. We have worked with people who have had to give up their jobs when they move into TA in order to be eligible for benefit, their own wages being insufficient to cover the rental costs. We have also worked with some people who have got a job while living in TA only to find themselves

# CARTREF YW POPETH HOME IS EVERYTHING



unexpectedly hit with a completely unaffordable rent bill. It is deeply wrong that some people are deprived of their ability to be financially independent when they move into TA, making it even harder for them to get back on their own feet. Stuck with no money, no job, and no idea about what the future will hold, it is little wonder that some end up struggling to maintain their mental wellbeing and their accommodation. We do however, recognise the good practice of some authorities who operate accommodation models in which the amount of rent paid can be reduced to ensure that employment can be sustained.

Service charge arrears (for charges such as utilities) are also commonplace and worrying given the potential for any such arrears to build up and prevent people moving on to settled accommodation. We would remind the Welsh Government and local authorities of our [good practice guide](#) on overcoming arrears as a barrier to social housing.

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

We are very aware of the extreme pressures that local authorities and their partners are facing and can only see these increasing over the coming months as the cost of living crisis takes hold. Our own caseload has seen a 114% increase in 'no fault' section 21 eviction notices since last year and mortgage possession cases are also beginning to rise. We are constantly hearing the message of how difficult it is to find alternative homes, both for individual households and for local authorities seeking to assist them.

The accommodation options available to local authorities are hindered both by what is physically available in their area and also by the funding they have available. Our figures on TA costs are a little out of date now, but it is fair to assume that budget pressures will have only increased since we last did a Freedom Of Information request last year which found that 18 local authorities had spent in excess of £6.3 million net in 2020/21, up from £4.6 million the previous year.

We are concerned that the race to secure accommodation in our pressurised housing market is leading local authorities to take some risks in terms of procurement. We are aware of a recent occasion where a block accommodation provider decided to make their accommodation unavailable at short notice,

# CARTREF YW POPETH HOME IS EVERYTHING



leaving the authority with a sizable group of households to be found alternative accommodation at one time. We feel that short-term and insecure contractual arrangements pose a real business and reputational risk for authorities and, critically, upheaval and added uncertainty for residents.

It's important for us to note here the impact of poor placements on our own caseload. Unsuitable placements remains the single highest reason for the homelessness reviews we support people to carry out. We are taking on a growing number of cases where people are challenging the suitability of the accommodation they have been placed in, the fact that they have been evicted from TA, or that they have been placed on a waiting list when there is a clear and immediate duty. This type of casework, as well as being time consuming, is very frustrating for our staff to be representing clients on these matters, often at a point of crisis when they are facing eviction in the next few days.

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

While we all recognise the need to build more social housing, this is by no means a quick fix to our housing supply emergency. From initial concept to tenants being moved in, we're aware that in some cases 2 or 3 years can elapse.

It is really encouraging to see the increased use of high-quality modular builds to provide both TA – [such as this example in the Vale of Glamorgan](#) – and permanent social housing units such as the [131 homes being proposed by Cartrefi Conwy](#) on the North Wales coast. While modular build can bring speed in terms of the construction process, such schemes are still unfortunately dependent upon securing land and negotiating lengthy planning discussions. We think it is vitally important that modular and non-standard homes are designed and built to with the needs of future residents in mind and there should be an aspiration for design to be informed by resident consultation, as there is a risk that such accommodation could fall short of people's needs depending on factors such as design, location, tenure etc.

We are also keen to do further work to ensure that social housing is being made available to people who need it most, and that decisions about the types of properties being developed are based upon need rather than ease of future management. Anecdotally, we understand that the low levels of single

# CARTREF YW POPETH HOME IS EVERYTHING



and shared accommodation units being developed may have been influenced by an aversion to the perceived higher levels of housing management which may be needed.

The Welsh Government is making commendable efforts to encourage local authorities and social landlords to factor in the needs of homelessness households to supply side planning in a more consistent way. This must be a priority at local level moving forward. We also understand that the Welsh Government is interested in reform around allocations, which is very welcome. Our Housing First project in Gwynedd is giving us an insight into the barriers that people who have experienced chronic homelessness can face when trying to access social housing, even if they have a guaranteed Housing First level of support in place. A minimum percentage for nominations to priority homeless households may be the only way of securing sufficient allocations.

Beyond housebuilding and allocations, our cost of living campaign includes a number of other calls to improve affordability and stability. We are calling on the UK and Welsh Governments to:

- 1. Take urgent action for tenants at risk of eviction**
  - Ban evictions this winter
  - End short-notice evictions for good, as soon as possible
- 2. Make sure tenants can afford their rent**
  - Give tenants a real route to challenge unfair rent rises
  - Bring forward the promised White Paper on rent controls
- 3. Protect homeowners from homelessness**
  - Provide a Welsh mortgage rescue package
- 4. Make housing benefits meet the real cost of renting**
  - Restore housing benefit to cover at least the bottom 30% of local rents
  - Scrap the benefits cap.

We are [calling on the UK Government](#) to work together to restore housing benefit to cover at least the bottom 30% of local rents, and to scrap the benefits cap. At a Welsh Government level, we are pleased that the Welsh Government has decided to extend six month notice periods to no-fault evictions for all existing tenancies from 1<sup>st</sup> June next year, although we are disappointed that it is not happening from 1<sup>st</sup> December at a time when need is so high.

We strongly welcome that the Welsh Government has made additional funds available to local authorities to help them prevent homelessness in flexible ways. We suggest that strategic topping up

# CARTREF YW POPETH HOME IS EVERYTHING



of Discretionary Housing Payments (DHPs) has considerable further potential for prevention. For example, Scotland boosted DHPs in order to top up benefits to end the Bedroom Tax. With a majority of people currently in TA being single person households, topping up housing benefits to a 2-bed rate would not necessarily be prohibitively expensive: we calculate, using figures for average social rents that this could be around £677.84 per person per year (14% of average 2 bed flat rent for 21/22). There are of course questions around the accessibility of DHPs: help offered is only as good as people's ability to access it, meaning the local DHP policies and application processes need to be simple and accessible.

From a social housing provision point of view, we welcome that the Welsh Government is thinking creatively about the purchase of existing homes by social landlords. While being a much quicker way of increasing the size of the stock, development teams have been dissuaded from exploring this further due to the required standards of WHQS, DQR and the decarbonisation agenda. Where purchases have been made, they have frequently been buy-backs of right-to-buy properties where landlords are familiar with the fabric and location of the property and the strategic benefits to acquisition are clear. Such purchases do need to be managed carefully in order to avoid causing localised house price bubbles, but at a time of such high need, we must consider every tool available to us that will increase the supply of good quality, affordable homes.

We are currently exploring this further in terms of rescuing tenancies and mortgages in the private sector market. We feel that there is a real opportunity to re-establish a Welsh Mortgage Rescue scheme, similar to the one that had dedicated capital funding in 2008-2010. Homeowners facing repossession would have the option of staying in the property through full acquisition by a social landlord or releasing an equity share. They would become social tenants or part owners depending on the arrangement. While this scheme has continued at a low level in some local authority areas, without dedicated funding it has been operating at local discretion.

We also believe that this model could be used to rescue tenancies where a landlord has served notice due to a wish to sell the property. The tenancy would be rescued through acquisition by a social landlord with the tenure again flipping to social housing or low-cost home ownership depending upon the circumstances of the tenants. We understand that this has been successfully undertaken in specific circumstances, i.e. where the property has been adapted for the household's individual needs. Our

# CARTREF YW POPETH HOME IS EVERYTHING



Oak Foundation-sponsored [homelessness prevention seminar](#) on the 23<sup>rd</sup> November will explore the opportunities for this with practitioners.

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

We went to take this opportunity to recognise the Welsh Government for their continued commitment to ending homelessness. Last November, when the high level action plan was finalised we were catching our breath after the height of the pandemic, reflecting on what had been achieved under the most challenging circumstances, and looking afresh at how we do things.

Little did we know that our challenges would not end there, and that recovery would be hindered by a cost of living crisis, itself adding fuel to the ongoing housing emergency. While it is Shelter Cymru's role to constructively challenge on behalf of people in housing need across Wales, we also recognise the extremely difficult economic and market conditions in which local authorities are currently operating. We have, for example, just seen the highest quarter on record for accelerated possession actions in Wales, and the numbers of people seeking assistance must feel overwhelming for statutory services.

We are aware that most authorities have, or are working towards having their Rapid Rehousing Plans in place. They have also told us however, that the aspirations set out in their plans are becoming less and less achievable due to the sheer weight of cases coming through their doors.

We recognise that authorities face challenges of retaining a prevention focus given the current pressures they face. There are some interesting service reconfiguration models coming forward involving specialist officers, some embedded from other service areas, and the management of more complex cases. We understand that there is also a good deal of creativity around the use of funding streams.

Although it has only been in place for 12 months, given our quickly changing environment, it feels appropriate to pause and reflect upon the priorities of the action plan and their deliverability on the ground. The original timescale of 5 years for implementation does not feel realistic in the current

# CARTREF YW POPETH HOME IS EVERYTHING



environment. We are unclear on progress to date towards building the 20,000 low carbon social homes within the Programme for Government. It's vital that we identify those priorities that will have greatest impact on prevention, meeting the needs of people who are homeless today and driving longer term planning so that the supply and demand for homes, particularly social homes, is better aligned in the future.

In this context we consider that the proposed Right to Adequate Housing provides an important overarching umbrella, and driver, for hardwiring steps towards the progressive realisation of a Wales where everyone has a good home they can afford.

This is a good opportunity to note our concerns about the Homelessness and Supporting People Officer networks. These were a vital mechanism for the Welsh Government to connect with frontline services and to directly hear about the challenges they face. We understand that local authority officers highly valued the networks as a supportive space to share learning and concerns. We understand that the Welsh Government's Relationship Manager structure provides a new way for bilateral relationships to be maintained, but as a national homelessness charity, we feel there is a gap left by the Network as a way for us to engage with authorities in a collective way. It is our understanding the Welsh Government plans to put new engagement mechanisms in place. We suggest that new mechanisms that work for local authorities are a priority to pool expertise, learning and mutual support, but also to facilitate engagement with third sector agencies, such as Shelter Cymru, as we all seek in our different roles to support unprecedented numbers of people through the housing and cost of living crisis.

**Prepared by Wendy Dearden, Dewi John and Jennie Bibbings**

9<sup>th</sup> November 2022

## Evidence to the Senedd Local Government and Housing Committee

November 2022: Crisis evidence

### 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.

### Response

- 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**

Crisis works directly with people experiencing homelessness and has close relationships with local authorities. We are therefore acutely aware of serious problems with the supply, suitability and quality of temporary accommodation.

Local authorities across Wales report that they simply do not have enough temporary accommodation to meet demand. The number of people presenting as homeless is increasing each month, but the number of people leaving homelessness behind is not.

The most recent statistics show that 1,480 people presenting as homeless were placed into temporary accommodation during August 2022, but less than half this number of people (708 individuals) were moved into suitable long-term accommodation during the same month.<sup>1</sup> This continues a broad trend of the number of people entering temporary accommodation exceeding the number of people leaving temporary accommodation, which has been recorded in almost every month since the Welsh Government first released this data in August 2020.

The lack of affordable settled housing means that many people are stuck in temporary accommodation for several months, and in some cases, years.

A considerable proportion of the people we work with are being accommodated in B&Bs and hotels. Whilst it must be acknowledged that some of these sites are of a decent standard, many others offer volatile, chaotic environments. Substandard conditions our members have experienced or are experiencing in their temporary accommodation include:

- Emergency accommodation infested with scabies, rats and fleas.
- Heating controlled centrally and not switched on until November.

---

<sup>1</sup> [Welsh Government Homelessness accommodation provision and rough sleeping: August 2022](#)



- Hot water controlled centrally – residents must request that it is switched on every time they need to take a shower.
- Lack of security – doors with broken locks resulting in theft of possessions by other residents.
- No access to cooking facilities, not even a microwave - this forces people to skip meals or rely on takeaway food which is often expensive and lacking in nutritional value.
- Constant noise throughout the night making it impossible to sleep.

As a result of these conditions, some of our members have stated that they feel safer sleeping rough than they do in temporary accommodation.

A further issue is that many people are being offered 'out of area' temporary accommodation, far from their support networks and the services they depend upon. For example, one of our Crisis members was offered temporary accommodation in Cardiff, even though they were required to attend regular probation meetings in Swansea – the logistics and financial burden of travelling back and forth would have placed considerable strain on the member, but if they missed the meetings, they would have been penalised and their rehabilitation jeopardised.

With regard to support services, many of our members have reported that they do not receive support when they are in temporary accommodation. This has resulted in some of our members falling into debt and arrears, which damages their chances of being accepted into settled housing.

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

Living in temporary accommodation can strip a person of their dignity and leave them with little autonomy and control over their own lifestyle and future.

Several of our members are required to present themselves to the local authority every day at 2pm to request emergency accommodation for that night. On presentation, they are not always successful in securing accommodation due to the unmanageable demand, and they then have very little time to secure accommodation by other means as many other support services close their offices at 4:30-5pm.

Having to vacate their accommodation every morning, not knowing if they will return to that particular accommodation or any accommodation at all that night, means that they have nowhere to keep their belongings and no guarantee of a warm place to spend the day.

This whole process is undignified, dehumanising and a far cry from the psychologically informed environment that we should be aiming to deliver across Wales.

Whilst many of the people we work with describe an initial feeling of relief when being placed in temporary accommodation, this is often replaced by unease due to the chaotic atmosphere within the accommodation. These unstable environments are especially difficult for people with experience of trauma, adverse childhood experiences and/or mental illness, all of which are common among people experiencing homelessness.

For those who have a history of substance misuse, it is almost impossible to recover and rehabilitate in these environments as they are often surrounded by the substances they are trying to escape, or by people connected with their substance misuse past. Beyond returning to using substances, it is common for residents in temporary accommodation to be targeted and coerced into drug-related work.

This presence of illegal activity also represents a particular challenge for people who have a history of offending. Some of our Crisis members have served prison sentences and are now engaging with our services to try and make a positive change to their life, but it is incredibly difficult for them to avoid re-involving themselves with criminal practice when living within an environment where it is so common. Probation licence conditions often include curfews which mean that a person must stay inside their accommodation between 7pm-7am – this is particularly difficult when the environment is as volatile as described above.

The negative impact that prolonged stays in unsuitable temporary accommodation can have on a person's wellbeing is well documented in literature. International evidence shows people using hostels and shelters can find them "intimidating or unpleasant" and are "pessimistic" about their helpfulness as a route out of homelessness.<sup>2</sup>

In 2018, Crisis conducted research on the experiences of people experiencing homelessness in Scotland being housed in unsuitable temporary accommodation, such as B&Bs, for prolonged periods.<sup>3</sup> Participants in the research spoke about how staying in unsuitable temporary accommodation led to isolation and loneliness which in turn caused a deterioration in their mental health. The lack of access to cooking facilities meant that 4 in 10 participants went without a meal on a daily basis.

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

Crisis enjoys productive working relationships with local authorities and partner organisations across Wales and is aware of the significant pressure the entire workforce is under and has been under for a considerable time.

We have heard that the local connection eligibility test is being used more frequently than usual as local authorities struggle with limited accommodation options; non-stock holding local authorities are facing particular difficulties as they have less control over the types of properties they can offer.

In January of this year, Cymorth Cymru research<sup>4</sup> reported that the huge numbers of people in temporary accommodation and requiring support feels overwhelming to many frontline staff working for third sector support providers and housing associations. These workers are already burnt out by the excessive workload they have had to take on since

<sup>2</sup> Mackie, P., Johnsen, S., and Wood, J. (2017) [Ending rough sleeping: what works? An international evidence review.](#)

<sup>3</sup> Sanders, B. with Reid, B. (2018). ["I won't last long in here": experiences of unsuitable accommodation in Scotland.](#)

<sup>4</sup> Powell, M. (2022). [Developing a resilient and valued workforce: Views from the Frontline Network Wales.](#)

the beginning of the pandemic, and they have the emotionally difficult job of repeatedly telling people facing homelessness that there is not enough support to meet demand. This is having a significant impact on the workforce's wellbeing and many staff members feel unable to carry on in their roles.

A similar report from Cymorth Cymru<sup>5</sup> published more recently tells us that the wellbeing of frontline workers is under even more strain as they continue to deal with such a high caseload with the added pressures of the cost-of-living crisis.

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

Crisis welcomes the Welsh Government's targets for building new social homes and its requirement for local authorities to increase localised housing supply through their rapid rehousing transition plans. However, we are also aware of the many barriers that result in slow progress towards these targets and feel that there are a number of other solutions to the housing supply problem that could be taken forward in the short to medium term.

##### Tackle unaffordability

Wales faces the second fastest growing rent costs in Great Britain, surpassed only by London. Rightmove estimate that rents have risen by 15.1% over the last year<sup>6</sup>, the gap between housing benefit and the cheapest rents is rising rapidly, and less than 1% of private rented homes in Wales are affordable to low-income renters.<sup>7</sup>

In Crisis' view, the quickest way to increase the supply of affordable housing is to urgently invest in Local Housing Allowance rates so they cover at least the bottom third of rents. Investing in housing benefit would make it more affordable for people to stay in their current homes, preventing homelessness, and make it easier for those currently experiencing homelessness to find a suitable home, ensuring their homelessness is brief.

This must also be accompanied by an increase to the benefit cap, to ensure that everyone can feel the impact of this rise. It is evident that the benefit cap is set far too low to effectively cover households' now spiralling cost of living.

Alongside this, easier access to direct rent payments in Universal Credit and replacing the five-week wait for UC payment with a starter payment would help to support PRS access for low-income households.

Crisis understands that benefits are reserved to the Westminster Government and we appreciate that the Welsh Government has invested in targeted support for low-income households in other areas, including a £6m increase to DHPs, a further £15m for the discretionary assistance fund, an extra £1m to help fund foodbanks, and a second round of the winter fuel support scheme. Although this does not directly address the cause of the housing unaffordability problem, reducing a household's spending on other essentials does mean they are more likely to be able to cover their housing costs. As the cost-of-

<sup>5</sup> Cymorth Cymru. (2022). [Struggles from the Frontline The impact of the cost of living crisis on frontline homelessness and housing support workers in Wales.](#)

<sup>6</sup> Rightmove. (2022). [The Rightmove Rental Trends Tracker.](#)

<sup>7</sup> The Bevan Foundation. (2022). [Wales' Housing Crisis: making the LHA work for Wales.](#)

living crisis continues, it is important to continually review whether further financial support packages are required.

Any investment into or reform of benefits should also be complemented with rent stabilisation linked to an inflationary measure. This would make the affordability of tenancies more sustainable and ensure that people who have experienced homelessness in the past are less likely to be forced into homelessness again in the future. In times of high inflation, we would ask the Committee to consider which inflationary measure it would be most appropriate to use for this. Crisis feels that there is scope for linking rental price regulation to wage growth.

### **Convert existing supply**

Although Crisis strongly believes that building new genuinely affordable homes is crucial to addressing the lack of affordable housing, in the short to medium term, it is worth considering how existing stock could be better used to this end.

We welcomed the Committee's investigation into empty homes in 2019 and suggest this becomes a renewed focus. There are over 25,000 empty homes in Wales – bringing them back into use is an obvious answer to the dearth of supply.

We would like to see efforts to raise awareness of the financial incentives available to property owners for bringing these homes back into use. The Welsh Government might wish to consider whether to offer greater financial aid in exchange for bringing a property back into use as social housing, for example via its Leasing Scheme, rather than private rental, which would result in a better social return on public investment.

In a similar vein, we would also advise the Committee to consider how the Welsh Government might disincentivise property owners from keeping homes empty on a long-term basis. It should be made clear to property owners and the general public that homes left empty on a long-term basis are contributing to the housing crisis and consequentially 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 could be supported to buy homes and let them out at affordable rents.

### **Widen access**

The Welsh Government should seek to improve data and monitor whether housing associations are complying with their current nominations agreements and also consider revising these agreements to increase the required proportion of nominations for homeless households.

In the context of the current crisis, social landlords' allocations policies should be adapted to ensure that homeless households are prioritised for social housing. Some housing associations are already doing this, working closely with local authorities to increase their allocation to households experiencing homelessness.

The Welsh Government should also review local authority and housing association exclusions policies to ensure they do not advise blanket refusals of applicants based on history of rent arrears, anti-social behaviour or offending – any concerns about an applicant's history should be addressed on a case-by-case basis and with open discussion with the applicant.

In the private rented sector, whilst it is illegal to explicitly refuse to rent to households in receipt of benefits, we are aware that landlords employ other exclusionary measures which make it extremely difficult low-income households to access private tenancies. Crisis believes that measures should be taken to prevent landlords from demanding such requirements, which include:

- excessive deposits or bonds;
- multiple references;
- a guarantor;
- proof of a minimum level of income.

Crisis would also recommend that the Welsh Government reiterate the illegality of blanket 'no-pet clauses' which prevent many people from accessing suitable housing. If a prospective tenant asks for a pet to be allowed as part of their contract, the landlord must not unreasonably refuse the request.

### **Prevent decrease in supply**

We must go beyond exploring options to increase the existing supply and consider how we might prevent a decrease in an already meagre supply within the context of the current emergency.

The Bevan Foundation report that several landlords are leaving the private residential rental sector in search of bigger profits and reduced regulation in the short-term holiday rental sector. The number of Airbnb properties in Wales has increased 53% over the last four years.<sup>8</sup>

There is also widespread concern that the introduction of the Renting Homes (Wales) Act 2016 will drive more landlords out of the market.

It is vital that the Welsh Government works with the NRLA and Rent Smart Wales to incentivise landlords to stay in the private residential rented sector and to understand any changes in the number of landlords entering and exiting the market. Key to achieving this will be the provision of continual support for landlords to work towards compliance with the Renting Homes (Wales) Act 2016.

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

Given the broad scope of the action plan, Crisis considers that progress has been made, particularly in beginning the transformation of the homelessness system.

---

<sup>8</sup> The Bevan Foundation. (2022). [Holiday lets and the private rental sector](#).

We welcomed the introduction of the interim legislation which added people who are street homeless as an 11<sup>th</sup> category of priority need and are especially pleased to be convening the Welsh Government's Expert Review Panel which is considering longer-term permanent reform of the homelessness legislation. We would be greatly appreciative of swift consideration of the panel's recommendations next summer so as to progress this work as quickly as possible.

We are also content that the Ending Homelessness National Advisory Board, chaired by our Chief Executive Matt Downie, is working on several areas of the plan. With wide representation from across the sector, the board's task and finish groups are considering key areas such as rapid rehousing, health and homelessness, anti-racism and homelessness, the national outcomes framework, and workforce.

In addition to this work, attention is needed on the commitment to increase housing supply, availability and accessibility – a lack of housing is an underpinning issue, and we are pleased that the Committee are seeking to progress this action.

With regards to the move towards a rapid rehousing approach, many local authorities have completed their rapid rehousing transition plans and it is essential that the local authorities yet to complete their plans do so as soon as possible. Once all plans have been submitted, it will be important to analyse them, highlighting best practice and identifying areas for improvement so that local authorities can learn from each other.

The delivery of the actions within the rapid rehousing transition plans requires a fully equipped, resilient workforce, as identified in the overarching action plan. Crisis feels that this must be prioritised, and to this end, supports Cymorth Cymru's recommendations for 'developing a resilient and valued workforce'.<sup>9</sup>

Overall, the Welsh Government has already taken and continues to take positive steps towards ending homelessness in the long term. However, as the number of people presenting as homeless continues to rise and the cost of living soars, it is important to continually review the situation and consider emergency interim solutions to keep people in their homes while longer term reform is being pursued.

*Thank you for reading this evidence. For more information, please email Jasmine Harris, Senior Policy and Public Affairs Officer [\\_\\_\\_\\_\\_](#)*

---

<sup>9</sup> Powell, M. (2022). [Developing a resilient and valued workforce: Views from the Frontline Network Wales](#).

## Paper 7

Briefing for the Senedd Local Government and Housing Committee

Subject: Rapid Rehousing and the Citadel Model

Written by: Bonnie Williams, Director, Housing Justice Cymru

Date: 4<sup>th</sup> November, 2022

### **Context: The role and involvement of Housing Justice Cymru**

[Housing Justice Cymru](#) is a national homelessness and housing need charity, working across England and Wales, with a vision of a society where everyone has access to a home that truly meets their needs. In Wales we run projects which help to end homelessness at an individual level by working with those in crisis and at a local and national level by increasing the supply of truly affordable homes. Our main three workstreams are:

**Citadel: A Rapid Rehousing Model:** A successful, volunteer-led, rapid rehousing and tenancy sustainment project, which uses trained volunteers to support people experiencing homelessness to find and sustain a home. Citadel is a homelessness prevention project, utilizing time, generosity, and commitment of volunteers, to support people at risk of experiencing homelessness, to find and/or sustain tenancies through building resilience, confidence, and positive social connections.

### **Background and Success: Citadel in Wales**

Citadel was launched as a response to the Covid-19 Pandemic and subsequent “Everyone In” Policy. The project was presented as an example of best practice at an online National conference for all Local Authorities, hosted by the Minister for Climate Change. Citadel is currently operating in Swansea, Neath Port-Talbot, and Wrexham where extensive development and resultant success has been achieved. The project emphasises that whilst it is vital to move everyone on from temporary accommodation, sustainment of tenancies is pivotal in combating homelessness across Wales. Housing Justice Cymru have identified that for individuals to sustain their tenancies, it is essential their house is made a home, providing safety and security, enabling them to flourish.

An example of the emphatic success the project has already achieved is in Swansea. Since October 2020, thirty-seven individuals have been referred to the project through rapid rehousing. Of these thirty-seven, thirty-three have sustained their tenancy for more than six months (twenty has sustained tenancies for more than twelve months, the remainder have not been in their tenancies for 12 months). Service engagement rates and tenancy sustainment rates have traditionally proved to be a challenge across Wales; however, the Citadel model has consistently demonstrated high engagement and tenancy sustainment rates. The rate of success of tenancy sustainment is a result of the careful considerations when matching volunteers with a supported individual. The matching process allows volunteers and the people they support to develop a supportive relationship, guiding them in the process of finding a tenancy and turning it into a home. Alongside the initial phases of acquiring a tenancy, the volunteer provides prolonged assistance and direction in aspects such as setting up bill payments, changing address with necessary organisations and services, and registering with a GP. The developed positive relationship between the volunteer and the person they support aids in building confidence and promotes positive social cohesion. The extremely positive outcomes are driven by just one paid worker (Citadel Co-ordinator), resulting in a cheaper and potentially more effective service.

The Citadel Project is highly effective due to the nature of the support provided through volunteers, dedicating their time to support people experiencing homelessness. This has proved to be

invaluable. In September 2021, Housing Justice Cymru commissioned an independent academic evaluator from Cardiff Metropolitan University to gather information from both individuals supported by Citadel and volunteers who support the project about if and how the Citadel programme helps people stay in their homes.

The key findings:

- People supported all highlighted the impact of the practical support they received. The support given around navigating housing search processes and being signposted to different organisations or properties available was highly valued. Individuals highlighted being able to get furniture from affordable organisations or having support for looking for appropriate furniture.
- All people supported spoke very positively about the social and emotional support they received from the Citadel volunteers. The key element here was that it was an authentic social relationship that did not just focus on providing time-limited support but encompassed broader elements such as mutual hobbies.
- Individuals supported welcomed the opportunity to meet others who were receiving support, particularly those who were further along in their rehousing journey. They found it useful to meet individuals who had experienced similar issues and had now put these behind them.
- Those supported were positive around the volunteer-led nature of the project. They highlighted that they felt that the volunteers were giving up their time for them as individuals, and this helped with the authenticity of the relationship.
- Volunteers asserted that having support enabled individuals to grow in confidence around sorting out issues related to their housing. This allowed individuals to more easily navigate processes and address problems that might have felt impossible previously.
- A key impact of the support as highlighted by volunteers was that individuals were able or encouraged to feel that they had value and were important, something that they might have lacked previously. This was linked to the volunteer-led nature of the project; that the supporters were giving up their time to build a relationship with individuals being supported.

The key link between all these elements of support was that the people supported did not feel alone. They had people to support them in their rehousing journey who they could call on for support. The support outlined here combatted feelings of loneliness and isolation which often linked to feelings of not being able to cope alone with changes that individuals were experiencing.

### **Key Considerations - Implementing Ending Homelessness in Wales: A High Level Action Plan 2021-2026**

***“True prevention requires a holistic response from Government” – Strategy For Preventing and Ending Homelessness (Oct, 2019, [Homelessness strategy \(gov.wales\)](https://gov.wales/homelessness-strategy))***

***“‘Unrepeated’ – Ensuring we have a system which places the right people in the right homes in the right communities with the right support, in order for people to succeed and thrive.” – Ending Homelessness in Wales: A High Level Action Plane 2021-2026 (2021, [Ending homelessness in Wales: a high level action plan 2021 to 2026 \(gov.wales\)](https://gov.wales/ending-homelessness-in-wales-a-high-level-action-plan-2021-to-2026))***

Welsh Governments vision is to ensure homelessness is rare, brief, and unrepeated. Welsh Government asked Local Authorities to develop rapid rehousing plans utilizing communities and volunteers, and states “the benefits of secure, settled, and self-contained housing for people who



have experienced or been at risk of homelessness should not be underestimated.” The Citadel model not only ensures this, but it also helps ensure tenancies are sustained (whether they are newly acquired or existing), to progress towards the vision of homelessness being unrepeated. People who have experienced homelessness need support accessing white goods, carpets, and furniture to enable them to create a house that is a home. Rapid rehousing is based upon a systemic approach to understanding what housing is needed. Through the supportive process of identifying potential homes for the people supported through Citadel, individuals can locate and develop houses, appropriate for them where they can build to flourish and thrive.

The High-Level Action plan also states that “we must harness both the third sector and unpaid volunteers who provide services that support and help tenants build confidence and a connection with the community.” Citadel is a project, utilising good faith and compassion of a volunteer network to provide this, and has already proved to be invaluable and a pivotal force in tenancy acquisition and sustainment. Although there several organisations tackling the issue of homelessness, there are very few volunteer-led projects across Wales that work directly with people who are experiencing homelessness. Research by Johns Hopkins University provides a useful framework to help improve understanding of the voluntary sector’s different contributions to society. The research states that; “The involvement of service users and volunteers in the design and delivery of services is frequently highlighted as contributing to high quality outcomes” and voluntary organisations encourage social interactions and therefore foster feelings of belonging, trust, and reciprocity.

Due to capacity and the high demand for support for people experiencing homelessness, paid staff members of organisations often have time-limited support in which they can offer, often leaving individuals isolated transitioning into the initial phases of their newly acquired tenancy. Citadel, however, focuses on holistic support, tailored to the needs of the individual, for a period that is not restricted. Volunteers support the individual they are matched to until confidence in managing their tenancy, home, and social connections has been built. The individuals supported feel they are given support and direction throughout and after acquiring their tenancies, leading to a high success rate of tenancy sustainment. This is a fundamental stage as people supported know they have someone to talk to, ask for guidance and support, and build confidence connecting with the community.

Citadel utilises a strength-based approach. The approach looks at each individual as someone with power and the ability to change their own circumstances recognising that every person has strengths and abilities and looks to see how those skills can be enhanced. Citadel is about helping a person to become the best version of themselves possible through the consistent support of one key volunteer, rather than different paid employees.

The Citadel model ensures safety for volunteers and people supported. A key requirement is a Disclosure and Barring Service (DBS) check for each volunteer and a risk assessment for each person supported. People experiencing homelessness can often present with elements of trauma, adverse childhood experiences, and mental health and wellbeing issues resulting in some possible vulnerabilities. Ensuring DBS checks, risk assessments, and carefully considered volunteer to supported individual matching, minimises the risk of relationships breaking down, safeguarding incidents and concerns, and reduces overall risk.

#### **Potential Areas for Scrutiny: Local Authorities responses to High Level Action Plans 2021-2026**

- While we need to provide housing at pace to accommodate people experiencing homelessness, we need to ensure we maintain the element of personal choice expressed as “paramount importance” in both Housing First and Rapid Rehousing. Therefore, what

measures have Local Authorities taken to ensure personal choice of how and where people are accommodated is considered?

- It is vital for Local Authorities to work with existing, frontline organisations and volunteers to address homelessness. Can they demonstrate how they are using the experience and resources of volunteers to enhance their response to ending homeless in Wales?
- There is significant pressure in Wales to move people on from temporary accommodation. Services are using a variety of models to accommodate people experiencing (or at risk of) homelessness across Wales. In some areas there are multiple different models of rapid rehousing commissioned by the Local Authority. How do Welsh Government and Local Government know which are the most effective? How is data collated to provide evidence of the success of different models, and how is this utilised to inform commissioning of services?
- What is the mechanism of identifying best practice among homelessness services? How are Local Authorities ensuring this is considered when deciding what services to commission? How are Local Authorities ensuring that best practice is embedded in the services they commission?

## Local Government and Housing Committee

### Homelessness consultation

### A response from Cymorth Cymru

11<sup>th</sup> November 2022

#### About Cymorth Cymru:

---

**Cymorth Cymru is the representative body for providers of homelessness, housing and support services in Wales.**

Our members provide a wide range of services that support people to overcome tough times, rebuild their confidence and live independently in their own homes. This includes people experiencing or at risk of homelessness, young people and care leavers, older people, people fleeing violence against women, domestic abuse or sexual violence, people living with a learning disability, people experiencing mental health problems, people with substance misuse issues and many more.

**We act as the voice of the sector**, influencing the development and implementation of policy, legislation and practice that affects our members and the people they support. We are committed to working with people who use services, our members and partners to effect change. We believe that together, we can have a greater impact on people's lives.

We want to be part of a social movement that **ends homelessness** and creates a Wales where everyone can **live safely and independently** in their own homes and **thrive in their communities**.

**Website:** [www.cymorthcymru.org.uk](http://www.cymorthcymru.org.uk)

**Twitter:** [@CymorthCymru](https://twitter.com/CymorthCymru)

**Contact:** [Policy@CymorthCymru.org.uk](mailto:Policy@CymorthCymru.org.uk)

## 1. Introduction

---

- 1.1 We welcome the Committee's decision to undertake further work on homelessness during this Senedd term.
- 1.2 The response to homelessness during the pandemic was extraordinary, with the Welsh Government putting in place the right policies and providing additional funding, and local authorities working closely with housing and support providers to secure emergency accommodation, provide invaluable support and keep people safe.
- 1.3 However, we are currently experiencing a perfect storm resulting from the lack of social house building over the past few decades, high private rents, inadequate welfare provision (particularly Local Housing Allowance rates), considerable stress on workforce capacity and wellbeing, and a cost-of-living crisis that is likely to push more people closer to homelessness.
- 1.4 In our response, we have provided answers to the Committee's questions, but also highlighted our concerns and recommendations regarding the upcoming Welsh budget.

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

---

- 2.1 We do not believe that Wales currently has an adequate supply of suitable, high quality temporary accommodation.
- 2.2 The latest Welsh Government figures showed that 8,545 people were in temporary accommodation as of 21<sup>st</sup> August 2022<sup>1</sup>, and 2,515 of these were dependent children aged under 16. This number has been steadily growing since the pandemic, with between 967 and 1,563 people entering temporary accommodation each month over the last two years. Between 427 and 708 people have been moved into suitable long-term accommodation each month, demonstrating the shortfall in affordable and suitable settled homes.
- 2.3 During the pandemic, local authorities accessed additional capacity in the form of hotels, B&Bs and holiday lets. However, due to the numbers outlined above, some local authorities do not have any remaining capacity and we believe all are struggling to meet demand.
- 2.4 Due to the pressure on the system, many people are living in inappropriate temporary accommodation for long periods of time. The Homelessness (Suitability of Accommodation) (Wales) Order 2015<sup>2</sup> sets out particular standards relating to this issue, with a particular focus on reducing the use of B&Bs. The code of guidance<sup>3</sup> for local authorities states that '*The use of bed and breakfast accommodation should be kept to an absolute minimum*'. However, the current pressures on temporary accommodation and lack of affordable settled accommodation means that local authorities are struggling to find alternatives.
- 2.5 Welsh Government statistics<sup>4</sup> show that on 31 March 2022, a total of 1,689 households were placed in temporary B&B accommodation, an increase of 15% on March 2021. This compares to 1,140 in private sector accommodation, 720 in social housing and 642 in hostels and women's refuges.
- 2.6 While the use of hotels and B&Bs was essential to keep people safe during the pandemic, it is concerning that so many people remain in this type of provision. People are living in hotel

---

<sup>1</sup> [Homelessness accommodation provision and rough sleeping statistics](#), Welsh Government, 2021

<sup>2</sup> [The Homelessness \(Suitability of Accommodation\) \(Wales\) Order 2015](#)

<sup>3</sup> [Guidance for Local Authorities on the Allocation of Accommodation and Homelessness](#), Welsh Government, 2016 (p116)

<sup>4</sup> [Homelessness statistics: April 2021-March 2022](#), Welsh Government

rooms and B&Bs without separate living spaces, cooking or laundry facilities, preventing them from being able to undertake the most basic functions and look after their families. People in B&Bs are often required to share bathrooms, which prevents them from having privacy and dignity within their own 'home'. There are particular concerns where young people are placed in this type of accommodation.

- 2.7 The Homelessness (Suitability of Accommodation) (Wales) Order 2015<sup>5</sup> also talks about the need for local authorities to consider factors such as proximity to health services, support networks, work and education. However, some people are being placed in temporary accommodation outside of their local authority boundary, due to the lack of available accommodation in their own area. This makes it extremely challenging for them to travel to work, take their children to school, visit their local health services and access their support networks. This is particularly acute for people who do not drive and people on low incomes, who cannot afford to travel each day.
- 2.8 Lack of suitable housing, particularly suitable move-on accommodation, means that survivors of violence against women, domestic abuse and sexual violence are remaining in refuges for longer than necessary. While refuge is a critical safe space for women and children fleeing abuse, it should not be regarded as a settled home and therefore becomes inappropriate when a woman and her children are ready to move into a stable, settled home.

### **3. The impact living in temporary accommodation has on individuals and families**

---

- 3.1 The following issues are commonly raised with us about the impact of living in temporary accommodation:
- Poor mental health caused by the uncertainty of being in temporary accommodation and the lack of clarity about when you might be asked to move or be provided with a settled home.
  - A sense of hopelessness when people have been stuck in temporary accommodation for long periods of time.
  - A sense of frustration and upset when people cannot provide a positive, settled environment for their children, which can sometimes impact on access to children and people's ability re-build these relationships.
  - Poor physical health when temporary accommodation is of poor quality.
  - Living in fear when placed in temporary accommodation with people who may be using substances or who may struggle with emotional regulation due to trauma.
  - Risk of losing sobriety when someone who has been clean is placed in temporary accommodation with people who are using substances.
  - A lack of dignity when people have to share bathrooms and kitchens.
  - Poor diet due to lack of access to a kitchen or cooking facilities in some types of temporary accommodation
  - Additional costs associated with taking children to school when they are placed in temporary accommodation far away from their school.
  - A risk to someone's job when they are placed in temporary accommodation far away from their workplace.
  - An inability or reluctance to access health and support services when they are placed in temporary accommodation far away from these services.

---

<sup>5</sup> [The Homelessness \(Suitability of Accommodation\) \(Wales\) Order 2015](#)

3.2 A recent BBC article<sup>6</sup> reported the difficulties faced by people living in temporary accommodation, highlighting the difficulties one woman and her baby had experienced. In one type of temporary accommodation she did not have any cooking facilities and in another she was placed 20 miles away from her support network. She also found the lack of stability difficult, and said "I really want to go back to work but I can't commit to getting a job around here as I could get a call tomorrow saying a house has been found in the area I've asked for which is miles away from here".

3.3 At Cymorth we regularly engage with people who have experience of homelessness, as well as frontline homelessness and housing support workers. We have chosen to provide direct quotes from both of these groups, so that you can understand their views and experiences in their own words:

### 3.4 **People with lived experience**

3.5 We have recently engaged with a number of people with lived experience via an online survey and visits to different types of temporary accommodation. Our survey asked them about the most positive element of their experience of temporary accommodation and we received the following responses:

*"Only positive was a room to stay in"*

*"Support from my [support] worker"*

*"Not [being] on the street."*

*"Knowing that I lived with people who had been through a similar experience."*

*"Being off the streets."*

*"Having a roof over my head and warmth"*

*"It's better than living on the street or a friend's sofa."*

3.6 Many of the respondents struggled to say anything more positive than it was better than the situation they had come from. This was reinforced to a certain extent by some of the people we spoke to in temporary accommodation, who said that it was preferable to sleeping on the streets or being in an abusive home - but made the point that even the highest quality temporary accommodation did not feel like a home, often due to the rules, the level of security, and the lack of agency that people had over the space.

3.7 Some people spoke very highly of their temporary accommodation, particularly where there were well trained support workers on site. They commented that the support they received from staff was excellent, that they appreciated the 24-hour staffing, and enjoyed the activities or volunteering opportunities that were provided to them. Others said they felt a sense of community where they shared accommodation with people who had similar experiences and could provide each other with peer support.

*"No-one will ever understand how beneficial this hostel was to me."*

3.8 When asked about the worst aspects of their experiences, the following responses were received from survey respondents with lived experience:

*"Placed into accommodation with no support, no food, more stress added as don't know how long to stay there. Other clients staying caused more issues."*

*"Doesn't feel safe. I don't feel stable (like I can relax). Can be noisy or chaotic with other tenants."*

---

<sup>6</sup> [Wales housing: Mother and baby in hotel due to shortage](#), BBC Wales, 2022

*"Out of borough - no cooking & washing clothes facilities no respect no privacy nowhere to store my belongings after losing my last tenancy no support no empathy didn't know where I was going until the day before no time for making arrangements to move."*

*"The quality of the property was poor, not knowing where you will be put next."*

*"Being around substance misusers."*

*"It's horrible, my stuff gets stolen, there are people injecting."*

*"I was on the top floor - an attic room with my 20 month old son. The room was tiny with a kitchenette. The toilet and bathroom were on the floor below me so I had to leave my son on his own if I needed to use the toilet during the night while he was sleeping. The room has 2 tiny windows the house was next to a train station. The room was boiling and couldn't open the windows as the trains would wake the baby. The shower has poo in it and was always dirty - I did not feel comfortable washing myself or my son in it. No communal living room - just a bedroom with 2 beds and a sink, a fridge, a microwave, kettle and toaster and a 2 ring hotplate. The room was approx 8ft x 10 ft. No room for wardrobes, chest of drawers or a chair to sit on. I had to put the TV on the kitchen counter as there was nowhere else for it to go. I was so depressed and wanted to kill myself."*

- 3.9 Our conversations with people in temporary accommodation highlighted a range of concerns with temporary accommodation, including not having a room of your own, parents being required to share a room with several children, not having your own living space, being accommodated with people who were actively using drugs, having cameras in your 'home', inexperienced agency staff at evenings or weekends, the length of time some people had spent in that temporary accommodation (one person had been there for nearly two years) and the uncertainty of never knowing when you might be able to move on. Others talked about the negative impact on their children and the feeling that they could not be the best parent in temporary accommodation.

*"I'm 20 years old and I've spent a year with two kids in a hostel. That's a 20<sup>th</sup> of my life."*

*"Temporary accommodation is like a prison but you don't know when you're going to be released."*

- 3.10 Finally, our survey asked people with lived experience about what should be improved about temporary accommodation and they provided the following responses:

*"More suitable accommodation where support is available being kept updated not leaving until the last day to be told I was moving to B&B - no storage options a lot of stress."*

*"My own kitchen or bathroom. (I eat takeout, as I don't want to cook in the shared kitchen). Knowing how long I am expected to be there."*

*"A more appropriate room for me and my son - I do not consider the room I was put in to be suitable for a family."*

*"Separate hostels."*

*"Housing being less judgemental."*

*"Support workers to provide proper support without judging."*

*"The staff could have helped me more in regards of helping me with benefits and what would be available to me."*

*"Being closer to more familiar places."*

*"People actually caring or wanting to help you have quality of life and a safe child."*

*"Proper heating facilities."*

- 3.11 The people we spoke to directly said that their experience of temporary accommodation could be improved in the following ways:

- Better communication from the council regarding progress towards securing a settled home and likely timescales for this.
- A time limit on how long people are in temporary accommodation before they get a settled home (e.g. 6 months).
- A variety of temporary accommodation that can enable people to feel safe and meet people's different characteristics and support needs (for example, dry and wet accommodation for people at different stages of their recovery, not putting young women in places with a high levels of violence and substance use, appropriate accommodation for people who are over 50 and for people with disabilities).
- Better quality temporary accommodation and better quality facilities.
- Better access to laundry facilities.
- Having access to a kitchen of your own.
- Being placed in temporary accommodation in an appropriate location, ensuring access to support networks, schools, and employment.
- More mental health support for people in temporary accommodation.
- Having larger rooms or more than one room when an adult has more than one child.
- Having more activities for children in temporary accommodation.

### 3.12 Frontline workers

3.13 Through our Frontline Network Wales, we regularly speak to frontline workers across Wales about their experiences and their views on policy and legislation. Frontline workers have recently made the following comments about temporary accommodation:

*"I'm working with a woman who has very poor MH, but it's really difficult to get her any specialist support and the temporary accommodation she is in is making it worse. People should come can see the state of some of the B&Bs, really bad, no cooking facilities."*

*"We see people who cannot cope with the stressful temp accommodation and so leave after a while, move to sofa surfing, maybe comeback, leave again when it becomes too much again- so they are not in one place long enough to be offered help, so people in services need to understand that if people are in highly stressful environment they will leave, but they still need to be offered support and a permanent tenancy."*

*"Debt is a big issue for my clients, one example - living temporary accommodation in a hotel for 5 months after being in custody, unable to move on due to a debt, they have an offer of employment and they can't access any help now, we need a better system".*

*"Another woman, I first supported her 5 years ago, still on the waiting housing, case was reviewed 3 years ago but the panel said no due her volatile MH, but her now is the most managed it has ever been - but she is still in temp accommodation- so we need to assume people are ready and give them chance."*

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

---

4.1 **Staff mental health and resilience:** Staff working in temporary accommodation are under tremendous pressure and have been for two years. They are trying to support huge numbers of people, often in accommodation that isn't conducive to good mental health and recovery from addiction. The lack of available move on accommodation means that they are unable to provide people with what they want: a settled home. As a result, they feel powerless and ineffective, which reduces morale. They are also on the receiving end of understandable frustration from people who have been stuck in temporary accommodation for lengthy periods and do not know when they might get offered a settled home.



- 4.2 **Poor throughflow:** The current pressures on the housing market mean that too people are unable to move on to an independent, settled home when they are ready and are therefore stuck in temporary supported accommodation for longer than they need. This has a knock-on effect on people who need to move into the service, but cannot access it until someone moves out. This could result in street homelessness, worse mental health and other challenges escalating unnecessarily while they are waiting. This can be particularly problematic for people needing to access refuge, who need to access a place of safety, with Welsh Women’s Aid reporting<sup>7</sup> that 692 survivors were unable to be supported in refuge in 2020-21 due to capacity.
- 4.3 **Inappropriate referrals:** Support services have noted that due to the pressure on temporary accommodation, their supported accommodation services are sometimes being sent inappropriate referrals for people with complex support needs that they are unable to support. This can lead to a breakdown in placement pushing the individual back into a cycle of homelessness. The additional impact of unsuitable placements is to other residents, cost to the local authorities and can potentially extend to impacts on the local community due to the individuals support needs not being met. This is due to local authorities placing individuals out of desperation due to the shortage of temporary accommodation placements available and the numbers of people presenting as homeless or at risk of homelessness.
- 4.4 **Loss of settled housing:** Some providers have told us that landlords have decided to offer their properties to the local authority to use as temporary accommodation, as they will receive more income than renting it as a settled home. While helping to provide more temporary accommodation, this results in fewer properties being available for settled homes, meaning people stay in temporary accommodation longer. We do not have evidence that this is widespread, but any loss of settled housing has a negative impact on people and the system.
- 4.5 The following quotes have been taken from our recent Frontline Network Wales online meetings and come directly from frontline workers in Wales:

*“My service is now facing pressure to house people which do not fit the age criteria of our service, just because there are not enough properties available. Our services is for older people, but pressure to house younger people who are in temp accommodation to get them off the street.”*

*“We are working with people who have been devalued by society, have been failed by various systems, and they have no self-worth, and some of their behaviours towards us comes from that, which in turn puts support works at risk, if there are not enough people to help them they feel like they don’t matter, this adds to the pressure and the unsafe work of the support workers. I would hate for any of my clients to feel that they don’t matter.”*

*“Not able to move people on so we’re getting a backlog, there are no easy cases – they are incredibly complicated - we don’t shut off at the end of the day- but limited as to what we can do when the tools aren’t there, single person accommodation is a real issue, the baggage that you go home with at the end of the day is what we really struggle with.”*

*“Women who have experienced domestic abuse – they feel guilty about being in temp accommodation [refuge] because they feel they are preventing others from accessing the service because they are ready to move on but there are no properties. If they get a job, they lose out on housing benefit, if they look at PRS landlords asked for a guarantors and bonds, so any properties end up going to working couples.”*

*“I need to find temp accommodation for someone who has been kicked out – our whole day is negative, I’ve never been this negative. I feel useless, there is nothing I can do to help them- there is no temp accommodation, no social housing. I don’t feel I can cope with this job much longer- and*

<sup>7</sup> [State of the Sector](#), Welsh Women’s Aid, 2021

*I never thought I would say that- I want to do a bloody good job, but I'm drained, there are not enough resources to help people and we can't help people.*

*"It has affected our relations with landlords who used to lease to us [Housing First] but they can get more money if their properties are used for temporary accommodation (£50 a night plus any damage covered) so we have lost properties to this scheme which are now used as self-contained temporary accommodation."*

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

---

- 5.1 The scale of the challenge is such that **significant investment in social housing** remains the key medium to long-term solution to this crisis. It requires the Welsh Government to continue to commit significant capital investment to enable local authorities and housing associations to build at least 20,000 social homes during this Senedd term.
- 5.2 However, the immediate pressures on the housing market, and the challenges of increased costs and shortages of labour and materials, means the Welsh Government and local authorities need to find other way to increase supply as we wait for this quantity of social homes to be constructed. In our view, this requires a combination of solutions, as each on their own will not meet the current housing needs.
- 5.3 Before considering the actions the Welsh Government and local authorities could take, it is impossible to ignore one of the major barriers to people accessing an affordable home: the failure of the UK Government to keep **Local Housing Allowance (LHA)** rates at an appropriate level to reflect the cost of housing in Wales. Research by the Bevan Foundation<sup>8</sup>, published in June 2022, showed that only 24 properties advertised across Wales were available at LHA rates, which equates to just 1.4%. Fifteen local authorities did not have a single property available at LHA rate. It is essential that the UK Government takes action to resolve this issue, or we will continue to see thousands of people unable to move on from temporary accommodation.
- 5.4 In July 2022 the Welsh Government announced £65m funding for the Transitional Accommodation Capital Programme<sup>9</sup>, which aimed to quickly create accommodation capacity by bringing mothballed properties that would otherwise not be re-let into use, remodelling existing accommodation, converting buildings into good-quality accommodation, and using modular accommodation as a medium-term form of housing on some sites as they are developed. If this **capital investment** proves to be effective, the Welsh Government should continue to provide funding for such initiatives while we are waiting for the 20,000 social homes to be built.
- 5.5 Bringing **empty properties** back into use. Between 2014 and 2019 it is thought there are roughly 27,000 dwellings (per year) that have been vacant for more than 6 months<sup>10</sup>. People with experience of homelessness have recently expressed their frustrations to us about the amount of empty properties in their local communities, while they are sleeping on the streets or living in unsuitable temporary accommodation.
- 5.6 Council led programme of **purchasing existing housing** as only 6% of dwellings in Wales are those rented by local authorities<sup>11</sup>. If private landlords are looking to exit the market, then purchase of these properties for social lettings should be considered.

---

<sup>8</sup> [Wales' Housing Crisis: an update on the private rental market in Wales](#), Bevan Foundation, 2022

<sup>9</sup> [Written Statement: A Place to Call Home – Transitional Accommodation Capital Programme](#), Welsh Government, 2022

<sup>10</sup> [Dwelling Stock Estimates for Wales](#), Welsh Government, 2020

<sup>11</sup> [Dwelling Stock Estimates for Wales](#), Welsh Government, 2020

- 5.7 Encouraging more private landlords to let their properties through the Welsh Government's private rented sector **Leasing Scheme**<sup>12</sup>, where landlords hand over their properties to the local authorities for a number of years with a guarantee of rent, while the local authority manages the property, lets to people exiting homelessness and provides support to help the person maintain their tenancy.
- 5.8 **Utilising land** which has been purchased for future developments, using modern methods of construction to provide temporary accommodation on the site, rather than leaving it empty and unused.
- 5.9 The Welsh Government should also continue to take **action on second homes**. Frontline workers in some areas of Wales, including Ynys Môn, Gwynedd and Pembrokeshire have told us that the prevalence of second homes is having a major impact on the rental market and making it impossible for people experiencing homelessness to find an affordable home.
- 5.10 In order to reduce the pressure on temporary accommodation we need to reduce the number of people who experience homelessness. This requires continued investment in **prevention services** through the Housing Support Grant and Homelessness Prevention Grant. Welsh Government statistics show that prevention work can have a significant impact on keeping people in their homes through tenancy support, mediation, legal advice and collaborative work with local authorities. In 2021-22, 6,162 households out of 9,228 who presented as at risk of homelessness were successfully prevented from becoming homeless<sup>13</sup>.

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

---

- 6.1 The Welsh Government's Ending Homelessness National Advisory Board is overseeing the implementation of the action plan and has established a series of task and finish groups to take this work forward:
- Rapid rehousing
  - Workforce
  - Strategic Outcomes
  - Housing Support Grant Outcomes
  - Equality, diversity, inclusion and homelessness
  - Health and homelessness
- 6.2 This work is moving at pace, with the first four Task and Finish groups having met regularly for the last twelve months, establishing sub-groups for particular focused areas of work, and developing recommendations for government. We have been involved in all of these four groups and we have facilitated engagement via our Frontline Network Wales, to ensure that frontline workers have had opportunities to influence the development of workplans and outcomes frameworks.
- 6.3 **Rapid rehousing**
- 6.4 The transition to rapid rehousing is hugely challenging, with local authorities dealing with the huge numbers of people presenting as homeless and in temporary accommodation, alongside trying to develop rapid rehousing transition plans. The lack of social housing is a

---

<sup>12</sup> [Guidance: Leasing Scheme Wales](#), Welsh Government, 2022

<sup>13</sup> [Homelessness in Wales, 2021-22 \(gov.wales\)](#)

significant barrier to delivering rapid rehousing, and there also needs to be significant progress with regards to the role of other public services.

- 6.5 The following will be critical if rapid rehousing is going to be delivered:
- 6.5.1 **Investment in capital and housing support:** The Welsh Government needs to continue to increase capital funding for social housing to be built and increase the Housing Support Grant to ensure appropriate support services to prevent and alleviate homelessness.
  - 6.5.2 **Corporate leadership within local authorities:** Rapid rehousing should not be viewed as the responsibility of the homelessness teams – this requires strong leadership from the top of the local authority and across several local authority functions.
  - 6.5.3 **Join up between capital development and homelessness:** This applies to both the Welsh Government and local authorities. The Welsh Government needs to continue to strengthen the relationship between housing development and homelessness policy. Huge strides were made during the pandemic and this must continue. Within local authorities, the strategic housing functions need to take ownership of rapid rehousing and align housing development with homelessness policy to ensure that the right type of homes are built in the right places in order to meet the needs of people experiencing homelessness.
  - 6.5.4 **Public services playing their part:** Rapid rehousing will only work if people have access to the right multi-agency support to enable them to maintain their tenancy. This means timely access to mental health services and substance use services, as well as support and cooperation from social care, criminal justice and other relevant public services.

## 7. Upcoming Welsh Government budget

---

- 7.1 We recognise that Ministers are anticipating a very challenging budget settlement, but we strongly believe that the Housing Support Grant should be one of the Welsh Government's priorities and given an inflationary increase. The services funded by this grant are absolutely critical to the prevention and alleviation of homelessness, and we are deeply concerned that failure to increase the grant for 2023/24 will put them at significant risk at a time when they will be more important than ever. The same applies to the Homelessness Prevention Grant.
- 7.2 **Cost of living crisis and frontline staff wages**
- 7.3 We warmly welcomed the increase to the Housing Support Grant during the pandemic, reflecting the need to fund more services. However, this has not resulted in a meaningful increase in staff wages. In September 2022, Cymorth published a report<sup>14</sup> that exposed the financial challenges facing frontline homelessness and housing support workers. This research shows that many are skipping meals, struggling to pay rent and bills, using food banks and taking on additional jobs. Others are leaving the jobs they love because they cannot make ends meet.
- 7.4 With record numbers in temporary accommodation and immense pressure on housing support services, there is a very real risk that providers will be unable to retain enough staff to maintain service delivery. Unless funding is increased to enable an increase in wages, frontline workers will be pushed further into poverty, or will continue to leave the sector for better paid jobs with less stress.
- 7.5 **The increased cost of running services**

---

<sup>14</sup> [Struggles from the Frontline](#), Cymorth Cymru, 2022

7.6 Homelessness and housing support providers are increasingly concerned about the cost of running services. Accommodation-based services such as temporary and supported accommodation have particular concerns about the increase in energy bills, which are often paid centrally by the support provider. We have also received feedback from some providers that they feel unable to bid for some contracts, as the funding offered does not cover the true cost of delivering the service. In some cases, the contract value is the same as a few years ago, with no inflationary increase to reflect the cost of running the service today. As well as choosing not to bid for contracts, there is a risk that some providers may walk away from existing agreements if there is no increase in funding.

#### 7.7 **Increased pressure on services**

7.8 The scale of homelessness in Wales, reflected in the huge number of people in emergency or temporary accommodation is putting acute pressure on services and the staff responsible for delivering them. They are also contending with implementation of the Renting Homes (Wales) Act 2016 and trying to engage in the planned transition to rapid rehousing. We fully support the Welsh Government's ambition to transform services and end homelessness, but this, along with the continued impact of COVID, is putting incredible pressure on services. While our members want to be part of the solution, they need more resources to retain and recruit more staff, expand provision, and maintain delivery of these critical services.

#### 7.9 **Risks to other public services**

7.10 Research<sup>15</sup> by Cardiff Metropolitan University has demonstrated that homelessness and housing support services deliver significant benefits to other public services. We also know that support providers often pick up the pieces when people who have experienced trauma and system failure have nowhere else to turn. If housing support providers are unable to maintain their service provision, the negative impact will not be limited to homelessness, but will also be felt by health, social care and criminal justice services.

7.11 We understand that Ministers face extremely difficult decisions as they set the budget for 2023/24, but the risks posed by not increasing homelessness and housing support funding are significant.

---

<sup>15</sup> [Evidencing the Impact of The Housing Support Grant in Wales](#), Cardiff Metropolitan University, 2020

## About The Wallich

The Wallich wants to create a Wales where people stand together to provide hope, support, and solutions to end homelessness.

As Wales's largest homelessness and rough sleeping charity, The Wallich operates under three core objectives: **getting people off the streets; keeping people off the streets; and creating opportunities for people.**

Running more than 100 diverse services, across 18 local authorities, The Wallich has worked with more than 5,000 people experiencing or at risk of homelessness between April and October 2022.

## Our response

We would like to thank the Local Government and Housing Committee for the invitation to share our views on the current situation of homelessness in Wales, in particular the current use of temporary accommodation and the transition towards rapid rehousing.

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

We remain deeply concerned about the high numbers of people in temporary accommodation (TA) across Wales (8,545 according to the latest official figures for August 2022), and these numbers are continuing to get higher each month. More new people are presenting to the system than are being successfully resettled, is resulting in increased pressure on staff and resources. Because of the shortage of appropriate housing for people to move on to, they are waiting for far too long in TA; in some cases we are aware of, up to twelve months in bed and breakfast accommodation.

Whilst in TA awaiting rehousing, we believe that significant numbers of people may be unable to receive sufficient support. People experiencing homelessness are much more likely than the general population to have experienced trauma and will therefore require more intensive wrap-around support. This might include addressing mental or physical health needs, substance use, financial advice, or managing family conflicts and relationship breakdowns. The Wallich is able to rapidly provide this support for clients referred into our projects, however given the high number of presentations, we do worry that some individuals will not get an equal level of service.



We are also deeply concerned about the quality of TA options. We know that local authorities are relying heavily on bed and breakfasts, and in some cases are once again using camping beds and sleeping bags as the only option to keep people indoors. Some local authorities are still using converted hotel accommodation procured at the height of the pandemic, and many of these rooms do not have cooking facilities beyond kettles and microwaves, which has a deskilling effect, really undermining the ability of residents to live independently with dignity.

There are of course additional pressures on the TA sector from the Ukrainian refugee programme. We are entirely supportive of the work of Welsh Government and local authorities to provide a sanctuary to Ukrainians fleeing war. Sadly, we have however noted that this is leading to increased competition for limited housing stock in some areas. There can also be complications arising from different pots of funding to support these different cohorts of people needing housing and support.

HSG commissioned support services are generally doing excellent work to support people in TA, but they are struggling to keep up with high demand and are unable to successfully resolve experiences of homelessness due to a critical shortage of appropriate permanent housing to move people on to.

## *The impact that living in temporary accommodation has on individuals and families.*

Any experience of homelessness will be traumatic for the person involved, but lengthy stays in accommodation not intended for long-term occupation will likely only exacerbate this trauma. The overall effect is that failing to provide sufficient levels of support now, will build up problems for the future. Problems which could require more intensive interventions from a whole range of other public services.

Long stays in TA also undermine the ability for individuals and families to plan for their futures. Many people are working or want to work, however this can have adverse impacts on the levels of housing benefit they receive, limiting their housing options for move on. Shockingly, we have had cases where our support workers have had to advise clients against taking on work until their housing situation is resolved, which of course can take many weeks or months.

On a simply practical level, many TA properties do not have internet connectivity, but residents need to get online in order to apply for their benefits, set up bank accounts, register with GPs, and manage a wide range of other responsibilities. Our support workers do excellent work supporting clients with all this admin, but once again it undermines the independence of those who would be quite capable of managing this themselves provided they could get online easily.



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

We believe that that a number of local authorities are currently at or over capacity for available accommodation options, which could mean that new individuals presenting as experiencing or at risk of homelessness may be turned away with no alternative accommodation offered. This could lead to increasing numbers of people forced to sleep on the streets, one of the most dangerous forms of homelessness, particularly as we move into winter.

Oversubscribed and overcrowded TA is also likely to push more people onto the streets if they feel it is too chaotic or otherwise falls short of meeting their needs. For example, an individual trying to maintain their abstinence or reduce their drug use may find it difficult to live in close proximity to others who regularly use substances.

Large TA properties such as hostels or converted hotels can be difficult for staff to manage when they are at full capacity, and the volume and complexity of residents' needs can very quickly lead to incidents which will have negative impacts on the local community, damaging neighbourhood relationships. Oversubscribed accommodation will generally lead to worse outcomes (and higher costs) across health services, policing and criminal justice, and other public services delivered by local authorities.

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

Across the housing and homelessness sector, we are all committed to a real change in approach; moving away from TA and the staircase model of 'housing readiness', and towards rapid rehousing and Housing First instead. However, in order to achieve this radical change we must build significantly more capacity across the system. This means investing in more TA with wrap-around support in the short term, as well as building more new homes and converting under-occupied and empty buildings into suitable housing.

We note the significant challenges facing the house-building sector at the moment, including labour shortages, increased costs and logistical challenges with supply chains, and the need to decarbonise. On top of these challenges, there are significant difficulties encouraging private housebuilders and developers to build genuinely affordable one-bedroom homes to meet the needs of single people in TA. In some areas, the only affordable options for move on are large, shared HMOs in the private rental sector, which are often low quality and not appropriate for the needs of the individual.





Without some sort of positive state intervention, builders will continue to build only larger family homes, luxury apartments, or high-density student accommodation, rather than the less profitable, affordable homes that meet the genuine demand in the system.

There are significant failings in the planning system from our perspective. Under the current Section 106 system, local authorities are not empowered to reject unsuitable developments and demand investment in affordable, sustainable communities.

We also experience some difficulties moving our clients into permanent housing, as a result of high qualifying criteria imposed by landlords, both private and housing associations. We typically support clients with the highest support needs who may have been turned away by many other services, and they may have had multiple failed tenancies in the past, or issues with anti-social behaviour or substance use.

We can find it difficult to convince landlords to accept our clients, as they tend to cherry-pick the more stable potential tenants. This undermines the principles of the Housing First or rapid rehousing approaches, which state that anybody should be considered 'tenancy-ready', so long as they are provided with the appropriate level of support. In Scotland, the Government have legislated to force RSLs to accept tenants to whom a homelessness duty is owed, meaning they cannot sit on voids until a better offer comes along. We would like to see Welsh Government consider something similar, as well as working with RSLs to turn over voids more quickly.

There is no getting around the fact that Welsh Government and local authorities need to spend significant sums of money, both to relieve the pressures on TA services (both buildings and support staff) at crisis point, and on building and repurposing more suitable homes for people to move on to.

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

There has been little information made public about progress implementing the Welsh Government action plan. However, we are aware that there is a lot of work is going on behind the scenes, some of which we have been involved with.

The first action on the plan was for each of the 22 local authorities to develop a rapid rehousing transition plan, to be in place by the end of September. At time of writing (early November 2022), only five authorities have published their plan on their public websites.

Whilst we understand that local authorities are facing significant pressures on both their frontline staff and back-office resources, this is a frustrating delay, as each month sees more and more people entering TA and fewer successful move-ons. It is vital that all local authorities publish their Rapid Rehousing Transition Plans as soon as possible, including



detailed needs assessments, upon which we can begin developing partnerships to deliver genuine multi-agency, person-centred support.

We would also like Welsh Government to publish all 22 transition plans in one place on their website, to make it easier to locate and compare the different plans which will be operating across Wales.

We have been involved in some of the work to develop the Welsh homelessness workforce, including, recruitment and retention, training, and recognition. After a particularly challenging recent period, supporting people through the pandemic, staff are in many cases burned out and demoralised. As a result, it is more important than ever that we recognise their enormous value and do our best to retain them in the sector. The priority for improving recruitment and retention of staff should be using HSG funding to increase staff pay, rather than allowing the commissioning process to create a race to the bottom through competition between providers.

We are also aware of the work going on to develop a new Homelessness Outcomes Framework, as well as data-collection arrangements to support this shift. We have long advocated for a move away from historic outcomes monitoring, from the days of the Supporting People programme, to something which better recognises that success looks different for different people. For some of our clients, success might mean living independently and managing a tenancy, but for others it might mean long-term supported accommodation and reducing their use of drugs and alcohol, for example.

It is also vitally important that the outcomes framework becomes a truly Wales-wide model: as an organisation that works across 18 different local authority areas, we would much prefer working to a single set of common outcomes, particularly where we have clients who move between county areas.

We also feel that the development of the new framework is an excellent opportunity to move towards more trauma-informed data collection. Asking individuals to repeatedly disclose their personal details must not be retraumatising, and we must improve our data-sharing processes so that clients only need to tell their story once.

The final actions from the Welsh Government plan that we want to highlight are Actions 9 and 10; improving services for people with mental illness and/or neurodiversities, and those with co-occurring substance use issues. We believe that a majority of the people we support have experienced mental ill health of some kind, and there are particular barriers to mental health services which exist for those with the most severe and complex conditions. In a recent survey of our staff, 90% of respondents said that they have found it difficult or impossible to access the right mental health support for their clients, and 76% felt that there are not appropriate referral pathways in their area for clients with severe mental health needs. 72% of respondents believe that people experiencing homelessness have worse access to services than the general population, and 60% felt that access has become worse since the outset of the pandemic.



In order for the action plan to be a success and realise our ambition of ending homelessness, we must build effective partnerships across the housing sector, health boards (including in particular mental health and substance use services) and other public services. If this work is seen as the sole responsibility of housing departments, it will not be successful. Without genuine commitment to non-judgemental, problem-solving, person-centred working from everyone involved, models such as rapid rehousing or Housing First will not succeed.





Emma Shaw  
Regional Manager - Wales & South West  
Rheolwraig Rhanbarthol - Cymru a'r De  
Orllewin  
Homeless Services / Gwasanaethau  
Digartrefedd

Tel/ Ffôn:  
Email/ Ebst:

Dear John Griffiths  
Re: Request for Evidence

Thank you for your letter dated 13<sup>th</sup> October, which invited us to provide evidence and respond to several enquiries raised by the Local Government & Housing Committee in respect to the use of, its quality and suitability of temporary accommodation.

About The Salvation Army;

The Salvation Army is a Christian church and registered charity present in 700 communities across the UK. We have worked with people with experience of homelessness for over 130 years. We believe that only by adopting a holistic approach to people's needs can we ensure that individuals and society as a whole achieve health in its fullest sense. We consider health is a wide concept meaning 'wholeness'. Pertaining to soundness of body and mind; including physical, mental, moral and spiritual welfare.

Today, our services include:

- The provision of over 2,200 units of supported housing in Lifehouses (residential homelessness services) across England, Wales, Scotland and Northern Ireland.
- Housing First services in Cardiff, Merthyr Tydfil, Glasgow, South Lanarkshire and Inverness offering intensive support to people with experience of sustained and recurrent periods of rough sleeping.
- Non-residential services offering Outreach to people who are currently rough sleeping and Floating Support for people living independently in their own homes.
- Church and community-based programmes offering practical support, including meals, cold weather shelters, opportunities to share fellowship and ease possible isolation, and the provision of information on social security and immigration.
- A Families Ministries Unit that exists to empower, equip and enable people of all ages to journey together, building appropriate relationships with others, having the intention of bringing them to faith in Christ and spiritual maturity.
- Social enterprise opportunities, such as a bicycle repair shop and a sandwich-making and selling project in Booth House Lifehouse, Swindon.

Reflecting now on the questions you posed here are our expressions of our research and experiences both from an organisational view point and quotes from those who have lived through temporary accommodation.

- 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;  
Support Services;**



Emma Shaw  
Regional Manager - Wales & South West  
Rheolwraig Rhanbarthol - Cymru a'r De  
Orllewin  
Homeless Services / Gwasanaethau  
Digartrefedd

Tel/ Ffôn:  
Email/ Epost:

As an organisation who have been supporting people for over 130 years. We are acutely aware of the need to offer personalised, safe, dignified, 'home like' environments, within our accommodation services. We recognise the need to offer people a variety of different housing & support solutions.

We currently deliver a portfolio of services across Wales that reflects this diversity, from our accredited Housing First project to our residential adult services, to our street based outreach.

Throughout all our services we hope to create communities within our Lifehouses that are psychologically informed spaces. We recognise that everyone who walks through our doors has at some stage in their life experienced trauma.

We have a specialist training pathway to develop our staffs knowledge and skills. Our psychologically informed approach to leadership and management enables us to support and develop staffs resilience and wellbeing, enabling professional development, progression and retention for all.

Within our portfolio of Lifehouses, we offer a bespoke bio psycho social programme to everyone. Our programmes range encompass a holistic approach to empowering individuals to have safer relationships with substances and alcohol. Our programmes offer stabilisation, detoxification, structured and unstructured group work and a variety of supporting and nurturing activities including; cooking, yoga, art, walking, education, and volunteering.

In the past 12 months we have positively supported 270 individuals in our Cardiff based adult Lifehouse. We have successfully supported 83% individuals out of the temporary accommodation system.

We have welcomed the resource of the new multi-disciplinary approach, to support within Cardiff and Merthyr Tydfil for those to whom access to statutory systems is restricted. This includes collaborative working between housing, mental & physical health, criminal justice and substance use teams.

#### **Supply/Suitability/Quality;**

Throughout the last two/three years we have seen an increase in the need for temporary accommodation, mainly as a direct response to COVID, lock down and the need to bring everyone in side for the health and wellbeing of all. We have seen an increase in the use of hotels, B&B and new residential accommodation across Wales. Further there has been an increased pressure and recognition that existing residential homelessness provision needs upgrading to meet WG COVID Phase 2, the need for self-contained units. We recognise the need to move towards these measures, however they come with a significant financial impact.

I think we would all agree that the use of hotels and B&B were always a temporary measure and a resource that was needed at the time. However, it is necessary to also note that some of these accommodation are still in use in some areas of Wales the cost associated with these accommodation types is high, the pressures of these financially on local authorities will only increase next year when we understand WG will ease payment to local

Newport Service Centre, First Floor, Unit 3, Oak House, Celtic Springs, Newport, NP10 8BD  
Tel/Ffôn: 01633 973090 Web/gwefan: [www.salvationarmy.org.uk](http://www.salvationarmy.org.uk)

The Salvation Army registered Charity No.214779 and in Scotland SC009359; Social Trust Registered Charity No. 215174 and in Scotland SC037691

The Salvation Army Trustee Company, registered number 00259322 (England and Wales). Registered office: 101 Newington Causeway, London SE1 6BN

General: Brian Peddle. Territorial Commander for the United Kingdom with the Republic of Ireland: Commissioner Anthony Cotterill.



Emma Shaw  
Regional Manager - Wales & South West  
Rheolwraig Rhanbarthol - Cymru a'r De  
Orllewin  
Homeless Services / Gwasanaethau  
Digartrefedd

Tel/ Ffôn:  
Email/ Epost:

authorities for the use of these styles of accommodation. The question would then lead us to consider how will these financial pressures impact current provision, innovation, adaptation and developmental work in line with WG Phase 2 and any future commissioning building requirements.

Further the introduction of the Renting Home Act and how this has impacted homelessness presentation and frontline provision classified as supported accommodation ultimately means that services will need to ensure there is enough administrative support to ensure the processes associated with the legislation is enacted.

To conclude I feel there are excellent support provisions within our homelessness residential services, however some of the older accommodation buildings are tired and need investment for future sustainability. We are aligned with Welsh Government's vision to create a safe, dignified and cohesive place to live and work. However, this must be appreciated within the difficulties of our current financial pressures, shortage of accommodation and increased homeless presentations.

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

Living in any multi-occupancy accommodation with people who have experienced complex *lives* will have an impact over time on someone's own mental health and wellbeing.

Within our own 'Seeds of Exclusion' research (2008) it was highlighted that the trauma and complex life experiences create an interplay of factors which impact on the health, happiness and wellbeing of society, as a whole.

We currently live in a challenging economic climate, where more than ever individuals in our communities are at risk of homelessness and destitution. The Bevan Foundation (July 2022) recently reported that 11% of people are worried about the prospect of losing their home over the next three months.

43% of people in Wales have seen their mental health deteriorate as a result of their financial position, whilst 30% have seen a deterioration in their physical health (Bevan Foundation, July 2022).

Therefore, people who do enter temporary accommodation have most likely already experienced high levels of social exclusion and trauma.

Every month around fifteen hundred newly homeless people are placed into temporary accommodation (Welsh Government, 2022). We currently have around eight thousand families and single people across Wales housed temporarily.

The experience of residing within temporary accommodation is incredibly challenging. Some of the individuals we have worked with who have resided in temporary accommodation shared the following experiences...

Newport Service Centre, First Floor, Unit 3, Oak House, Celtic Springs, Newport, NP10 8BD  
Tel/Ffôn: 01633 973090 Web/gwefan: [www.salvationarmy.org.uk](http://www.salvationarmy.org.uk)

The Salvation Army registered Charity No.214779 and in Scotland SC009359; Social Trust Registered Charity No. 215174 and in Scotland SC037691

The Salvation Army Trustee Company, registered number 00259322 (England and Wales). Registered office: 101 Newington Causeway, London SE1 6BN

General: Brian Peddle. Territorial Commander for the United Kingdom with the Republic of Ireland: Commissioner Anthony Cotterill.



Emma Shaw  
Regional Manager - Wales & South West  
Rheolwraig Rhanbarthol - Cymru a'r De  
Orllewin  
Homeless Services / Gwasanaethau  
Digartrefedd

Tel/ Ffôn:  
Email/ Epost:

*"I have lived in my temporary flat with my husband and baby for 8 months now. We are so grateful for the help but our flat is on the second floor of a house. We only get to our front door to the flat from the outside metal (fire escape) stairs. I don't take my baby out because I am scared of carrying him down the stairs. I cannot carry him and the pram, so we just stay at home. The flat is very cold and we cannot afford to heat it as much as we want to. My baby is often crying. Sometimes I feel like I can't cope"*

***Irena\*\*, Salvation Army Floating Support Cardiff***

*"I have always found it hard to cope, to manage, in hostels/TA. When you have your own problems, it's hard to be around other people who have got those problems too. It just made things so much worse for me. I was using more drugs and I just couldn't cope with all the noise, people banging my door asking me for money. That's why I started rough sleeping".*

***Alex\*\*, Salvation Army Housing First Cardiff***

The individuals we support are experts in their own lives and understanding their experiences can help us to provide better more impactful support, and a wider understand some of the key issues affecting the health of society as a whole. This will also enable us to develop more effective preventative approaches, that stop homelessness before it happens.

However, the continued financial pressures placed on services and local authorities only enable us to meet the immediate demands of homelessness, including homelessness presentations, service delivery, implementation of the renting homes act and the WG Homelessness Action Plan. Further financial investment is needed to enable services to expand their focus beyond immediate firefighting.

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

Across our portfolio we work in close partnership with a number of local authorities, who are experiencing significant difficulties in accommodating an alarming increase in homelessness presentations.

#### **Demand;**

In Cardiff the demand for temporary accommodation has increased significantly and waiting lists for all Gateways (families, single and young persons) combined are up 350%, higher than in previous years (Cardiff Council, 2022).

Across Cardiff, 83 families are waiting to be placed in temporary accommodation with a projected shortage of accommodation estimated at 126 units by end 2022/23. This is without the potential impact of Ukraine schemes. There has been a 247% increase in cases presenting with a Section 21 "No Fault Notice" from their landlord (*increase compared January 2022 - August 2022 against the same period in pre-pandemic 2018*).

Newport Service Centre, First Floor, Unit 3, Oak House, Celtic Springs, Newport, NP10 8BD  
Tel/Ffôn: 01633 973090 Web/gwefan: [www.salvationarmy.org.uk](http://www.salvationarmy.org.uk)

The Salvation Army registered Charity No.214779 and in Scotland SC009359; Social Trust Registered Charity No. 215174 and in Scotland SC037691

The Salvation Army Trustee Company, registered number 00259322 (England and Wales). Registered office: 101 Newington Causeway, London SE1 6BN

General: Brian Peddle. Territorial Commander for the United Kingdom with the Republic of Ireland: Commissioner Anthony Cotterill.



Emma Shaw  
Regional Manager - Wales & South West  
Rheolwraig Rhanbarthol - Cymru a'r De  
Orllewin  
Homeless Services / Gwasanaethau  
Digartrefedd

Tel/ Ffôn:  
Email/ Eboost:

Notices where the landlord is selling the property are up by 127 (254%) and could be a consequence of high property prices in the market.

The rapidly increasing demand leaves the local authority and its charitable partners in a position where families and single people cannot be effectively supported because there is simply nowhere for them to go. The impact societally is devastating, with families spending long periods of time in unsuitable temporary settings, negatively impacting their welfare and wellbeing.

Our other key local authority partner, Merthyr Tydfil Borough Council have shared that there are currently attempting to support 160-170 homeless people in Merthyr Tydfil with 60 plus in B+B's. Merthyr Tydfil is an area that already experiences deprivation, poverty and inter-generational unemployment and homelessness. These additional pressures create a mountain that can feel impossible to climb.

#### **Ukraine;**

The complexities of the Ukrainian refugee crisis, and the uncertain global picture continues to add additional pressure to our already overboiling systems. In the past year 8,759 visa applications have been made in Wales. Of these 5,340 families and single people have now arrived.

In Cardiff, 414 individuals are currently residing in Welcome Centres/ Hotels and 396 are living with private sponsors. It is estimated 150 individuals are living with family via the family visa scheme route. Approximately 994 individuals therefore may need permanent housing in Cardiff.

#### **Outreach and Housing First;**

Our Outreach services continue to play an essential role in meeting the needs of rough sleepers on the streets and helping to empower and support individuals away from homelessness.

Our First Response Outreach Team in Cardiff support around 300 individuals every month who are rough sleeping or engaging in street based life styles (Salvation Army, 2022). The team deliver a wide variety of interventions supporting with wellbeing, advocacy, specialist advice and referrals whilst also empowering and enabling individuals to move successfully into accommodation. In the past three months the team have delivered over seventeen hundred separate interventions to individuals seeking support on the streets.

Our Housing First model continues to struggle with demand, the service currently operates significantly over capacity, with around 6 new requests to refer every month, 8 clients supported on an outreach basis and 25 already in accommodation (Salvation Army, 2022). Due to shortage of appropriate social housing, Housing First clients on average wait 6 months to be allocated a property, a waiting time that far exceeds the principles of the model.

Newport Service Centre, First Floor, Unit 3, Oak House, Celtic Springs, Newport, NP10 8BD  
Tel/Ffôn: 01633 973090 Web/gwefan: [www.salvationarmy.org.uk](http://www.salvationarmy.org.uk)

The Salvation Army registered Charity No.214779 and in Scotland SC009359; Social Trust Registered Charity No. 215174 and in Scotland SC037691

The Salvation Army Trustee Company, registered number 00259322 (England and Wales). Registered office: 101 Newington Causeway, London SE1 6BN

General: Brian Peddle. Territorial Commander for the United Kingdom with the Republic of Ireland: Commissioner Anthony Cotterill.





Emma Shaw  
Regional Manager - Wales & South West  
Rheolwraig Rhanbarthol - Cymru a'r De  
Orllewin  
Homeless Services / Gwasanaethau  
Digartrefedd

Tel/ Ffôn:  
Email/ Epost:

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

According to Jonathan Baxter, 2009/2010 report, figures indicated that Wales does not have enough homes. Research commissioned by the Welsh Government estimates that over 14,000 new homes are needed every year in Wales for the next 15 years, to meet demand. This is in addition to existing unmet need and far in excess of current levels of supply.

The Ending Homelessness High Level Action Plan also indicates a need to increase housing supply, indicating a roll out of a tenancy Leasing Scheme and a commitment to build 20,000 new social homes for rent.

Our experience also confirms this from the lower number of positive move on we have from our current services and the slower pace that properties have become available to our Housing First clients.

Despite these challenges we do continue to see expressions of creativity, aimed at reducing time in temporary accommodation, and providing more effective overall support. We have recently seen a new innovate project come on board from United Welsh offering young people the ability to move into a shared accommodation at a very low rent.

This project is aimed at young people who are able to live independently and who are accessing education and training. It will be good to see how this initiative works and what learning can be taken forward to other potential projects.

The Salvation Army support working with registered social and private landlords to understand and work through barriers to accessing accommodation. Our work in Floating Support and Housing First has enabled us to critically evidence that with the right level of support independent living is achievable for everyone, no matter their complexity of need.

In summary, there are currently many economic and social factors which are contributing to the increase need for affordable and appropriate housing solutions. We believe it is essential to balance the provision of low threshold rapid and affordable housing, against projects that support longer term and sustained support. Again, our focused on providing safe and dignified accommodation for all is our key agenda.

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

We have attended consultations and presented learning from our Housing First models in possible design and implementation of some local authorities rapid rehousing approaches. Furthermore, we are part of the pilot

Newport Service Centre, First Floor, Unit 3, Oak House, Celtic Springs, Newport, NP10 8BD  
Tel/Ffôn: 01633 973090 Web/gwefan: [www.salvationarmy.org.uk](http://www.salvationarmy.org.uk)

The Salvation Army registered Charity No.214779 and in Scotland SC009359; Social Trust Registered Charity No. 215174 and in Scotland SC037691

The Salvation Army Trustee Company, registered number 00259322 (England and Wales). Registered office: 101 Newington Causeway, London SE1 6BN

General: Brian Peddle. Territorial Commander for the United Kingdom with the Republic of Ireland: Commissioner Anthony Cotterill.



Emma Shaw  
Regional Manager - Wales & South West  
Rheolwraig Rhanbarthol - Cymru a'r De  
Orllewin  
Homeless Services / Gwasanaethau  
Digartrefedd

Tel/ Ffôn:  
Email/ Epost:

group who are working through the new outcomes framework utilising our knowledge from a range of projects which include floating support, and young person's residential services.

We provided support to those residing in emergency temporary accommodation following the public health response as part of our existing Housing First services within Merthyr Tydfil and adapted our outreach services within Cardiff to support the move for 'Everyone In' during the pandemic years. This has ensured that no one was left without support. We also initiated a not asked to leave policy in our frontline provision and continued to operate our Reconnection Services within Cardiff, throughout lockdown.

As an organisation we have always been committed to the development and training of our staff team. This is a core element of our services and one in which we have continued to thrive and share our own internal resources and knowledge with local authorities and partners agencies. We pride ourselves on our organisational growth and imbed academic learning from the ACEs research, and trauma informed interventions, within all our services.

Over the last four years we have introduced a bio psycho social programme across all of our residential services. We embed harm reduction and the ethos 'to do no further harm' to all those who seek support from us. We offer a bespoke role within our adult homeless service of a Clinical Key Worker, which is designed to support those individuals to work towards a detoxification goal of their choosing.

This service also offers a stabilisation programme reaching people where they are at within their own substance use journey, working at their pace. We work collaboratively with health, Cardiff & Vale Alliance, housing and multi-disciplinary teams throughout Wales.

All our residential services have an Early Intervention Worker. Our adult service within Cardiff also has an Outreach Worker supporting those from street to home whose lives have been impacted by substance and/or alcohol. Our Young Peoples Service have two staff members trained in mediation, offering a further enhanced support to young people and their families.

Our Housing First services also operate with a key outreach role engaging with those considered hard to reach. Furthermore as described earlier in the letter we have adapted our assertive outreach model to now operate 7 days a week service to those residing on the streets of Cardiff, offering a critical safety net to those who may find themselves homelessness on a night. We have continued to support those in the community through our Floating Support and Tenancy Rescue services. Together with our churches we are now also supporting the warm welcome initiative.

Our commitment to offering consistent high quality support to people experiencing or at risk of homelessness, creates our commitment to the actions set out in the Ending Homelessness Plan. Through offering a wide portfolio of accommodation services we hope to form part of the rapid rehousing model, enabling safe, home-like spaces for individuals in need of accommodation.

Newport Service Centre, First Floor, Unit 3, Oak House, Celtic Springs, Newport, NP10 8BD  
Tel/Ffôn: 01633 973090 Web/gwefan: [www.salvationarmy.org.uk](http://www.salvationarmy.org.uk)

The Salvation Army registered Charity No.214779 and in Scotland SC009359; Social Trust Registered Charity No. 215174 and in Scotland SC037691

The Salvation Army Trustee Company, registered number 00259322 (England and Wales). Registered office: 101 Newington Causeway, London SE1 6BN

General: Brian Peddle. Territorial Commander for the United Kingdom with the Republic of Ireland: Commissioner Anthony Cotterill.



Emma Shaw  
Regional Manager - Wales & South West  
Rheolwraig Rhanbarthol - Cymru a'r De  
Orllewin  
Homeless Services / Gwasanaethau  
Digartrefedd

Tel/ Ffôn:  
Email/ Epost:

Thank you in consider the evidence we have presented, and I look forward to representing our views in person at the next committee.

Kind regards

Emma Shaw  
Regional Manager Wales & South West

Newport Service Centre, First Floor, Unit 3, Oak House, Celtic Springs, Newport, NP10 8BD  
Tel/Ffôn: 01633 973090 Web/gwefan: [www.salvationarmy.org.uk](http://www.salvationarmy.org.uk)

The Salvation Army registered Charity No.214779 and in Scotland SC009359; Social Trust Registered Charity No. 215174 and in Scotland SC037691

The Salvation Army Trustee Company, registered number 00259322 (England and Wales). Registered office: 101 Newington Causeway, London SE1 6BN

General: Brian Peddle. Territorial Commander for the United Kingdom with the Republic of Ireland: Commissioner Anthony Cotterill.

Welsh Parliament  
Cardiff Bay  
Cardiff  
CS9 1FN

Unit | Uned 22, Parc Ffordd Las,  
Rhyl,  
Denbighshire | Sir Ddinbych  
LL18 2QD

18 November 2022

To Whom it may concern

***Re: Nacro perspective of homelessness situation in Wales.***

I am writing in my capacity as a Service Manager for Nacro across Conwy, Denbighshire, Flintshire and Wrexham, but also having talked to my counterparts in Gwynedd, Carmarthenshire and Pembrokeshire.

I have worked in this field for the past 24 years and the situation as it stands is the most desperate I have ever seen it.

Nacro is a social justice charity. We operate a wide variety of services across Wales, all housing-related in some form or other. We have Floating support projects, supported housing projects, we help to run emergency accommodation in Pembrokeshire, and we also have Resettlement and Advice projects in Conwy and Denbighshire, a Bond Scheme and other Drop-in facilities for homeless people. We have therefore had a chance to see what people are facing on the ground, both from a service user perspective, and a landlord perspective.

Really since the pandemic, when people were all placed in emergency accommodation if they were homeless, we have seen no real let-up.

Supply in the private rented sector has dwindled for a number of reasons;

[nacro.org.uk](https://www.nacro.org.uk)

Mae'r holl ohebiaeth ar gael yn Gymraeg ar gais · All correspondence is available in Welsh on request.

Nacro: Elusen cofrestredig 226171 · Nacro: Registered charity 226171; Cwmni Cofrestredig (Llundain) 203583 · Registered company (London) 203583  
Cwmni cyfyngedig drwy warrant (Llundain) no.1052098 · A company limited by guarantee (London) no.1052098  
Darparwr cofrestredig o dai cymdeithasol no.H2030 · Registered social housing provider no.H2030

Swyddfa gofrestrdedig/Registered office: Walkden House, 16–17 Devonshire Square, London EC2M 4SQ



Firstly landlords are cautious about some of the changes to the housing law that are due to come in in December. Rather than navigate this, many are choosing to sell.

Property house prices increased following lockdown as many people realised because of Lockdown that working from home afforded them more flexibility in where they could live. Furthermore, because of the complexity of travel abroad, more people were choosing holidays closer to home, which in turn led a good number of landlords to change the use of their properties to an Air BNB model, instead of renting. This supplies them with an all round better return.

Local Authorities are also trying to move people from the emergency accommodation that they have been in, and because there is little in place from a social housing perspective, they are also using the private rented sector. It is common for us to see adverts for private rent being put on social media and the local authority is offering a landlord 6 months rent up front, which makes it extremely difficult for anyone else to even be considered.

Now that the cost of living crisis and increase in interest rates is taking hold, many people who may have considered buying a property and vacating a private rented property, are instead staying put which is putting further strain on an already smaller stock of private rentals.

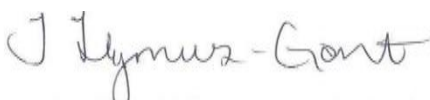
The competition for finding and securing accommodation in the private rented sector is fierce. Landlords we know have had 100 enquiries within the space of an hour of having advertised a rental, and have booked 30 – 50 viewings. They are able to take their pick in terms of who they take and their rents are often way above recommended local housing allowance amounts leaving people who rely on state benefits unable to compete.

From our Resettlement projects, we have noticed a change in who accesses our services. Previously it was predominantly people with complex needs but now it is also regular people who just need help and are struggling to find anything. Because of the competition to find good quality rented properties, anyone who presents with more complex issues is finding it even more difficult.

Sadly this is a rather sombre but very real reflection of the situation that our teams are facing at the moment. On a daily basis we take heartbreaking phonecalls from people who are at their most desperate and we are left with very few solutions for them to alleviate the problems that they face. I know we are not alone in this, as talking to other colleagues in both statutory and voluntary organisations, is a similar picture for us all.

Thank you.

Yours faithfully,



Jessica Hymus-Gant  
Service Manager  
Nacro Cymru

# Agenda Item 5

## Local Government and Housing Committee

24 November 2022 – papers to note cover sheet

| <b>Paper no.</b> | <b>Issue</b>   | <b>From</b>   | <b>Action point</b> |
|------------------|--|---|---------------------|
| Paper 12         | Community assets   | Penarth Town Council  | To note             |
| Paper 13         | Matters related to legislation – Legislation, Justice and Constitution Committee | Chair of the Legislation, Justice and Constitution Committee to the Minister for Finance and Local Government | To note             |
| Paper 14         | Forward work programme   | Chair of the Finance Committee to the First Minister  | To note             |
| Paper 15         | Corporate Joint Committees (CJCs)  | Minister for Finance and Local Government   | To note             |



Mr John Griffiths MS  
Chair  
Local Government and Housing Committee  
Welsh Parliament  
Cardiff Bay  
CF99 1SN

11<sup>th</sup> November 2022

**Re: Community Asset Report – One Voice Wales Reponse**

Dear Mr Griffiths,

Penarth Town Council met last night, and the Local Government & Community Housing Committee Report on Community Assets was included for discussion on the Council's Agenda.

The conclusion of the discussion was to request a letter be sent to you concurring with One Voice Wales's findings and to support a more strategic approach being taken when considering asset transfers in Wales.

The asset and the community should be at the forefront of any decision to make a transfer but must be backed up by due diligence and support from the principal councils and Welsh Government.

Yours Sincerely,

**Emma Boylan (Mrs)**  
**Town Clerk on behalf of**  
**Penarth Town Council**

Rebecca Evans MS  
Minister for Finance and Local Government

16 November 2022

Dear Rebecca

## The Non-Domestic Rates (Chargeable Amounts) Regulations 2022

Thank you for your letter of 8 November informing us that, should it be necessary to lay the Non-Domestic Rates (Chargeable Amounts) Regulations 2022, it is likely that the timetable for their scrutiny will need to be expedited.

We acknowledge your explanation that this is as a result of the UK Government's Autumn Statement being scheduled for 17 November and the need for the Welsh Government to have all available information before making a policy decision on these Regulations.

We are aware that any Regulations must follow the draft affirmative procedure and must be in force prior to 1 January of the year of a revaluation.

You have told us that draft Regulations may not be available to be laid until 6 December, with the intention of their being debated on 13 December. We welcome your acknowledgement that this provides a much compressed timetable for our consideration of the draft Regulations and we thank you for seeking, well in advance, our assistance in expediting scrutiny, should that be needed.

We, and our supporting Senedd Commission officials, will do our best to undertake scrutiny of the draft Regulations within the required timeframes.

You may be aware that we have also received a request from the Minister for Climate Change to expedite our consideration of regulations to facilitate the implementation of the *Renting Homes (Wales) Act 2016*.



I would ask that you keep us, and our officials, updated with relevant developments.

Yours sincerely,

*Huw Irranca-Davies*

Huw Irranca-Davies

Chair



Mark Drakeford MS  
First Minister

16 November 2022

Dear First Minister

## Scrutiny of the financial implications of Bills

I am writing to you given your overarching responsibility for the Welsh Government's Legislative Programme.

The Finance Committee is deeply concerned that the Welsh Government has moved away from the practice in the Fifth Senedd of providing a written response to Committee Stage 1 reports before the Stage 1 debate takes place and before the Senedd is required to agree a Financial Resolution.

The Finance Committee's role is to consider the financial implications of Bills and our reports often conclude that we are content with the financial information contained alongside Government Bills subject to a commitment from the Minister to provide further financial information that we have requested. As the motion to agree a Financial Resolution usually takes place straight after the Stage 1 motion has been agreed, the Welsh Government's refusal to provide a formal response to our recommendations means that the Senedd is being asked to agree to committing resources before the Minister's views are known. We consider this to be unacceptable and it undermines the scrutiny process.

The Committee has considered the financial implications of all Bills that have been introduced this Senedd, excluding the consolidation Bill which is subject to different procedures. In our scrutiny of the first Bill introduced, the *Tertiary Education and Research (Wales) Bill*, we set out our expectation for this Senedd that RIAs should contain the best estimate possible for costs and benefits to enable us to fully scrutinise the overall financial implications of a Bill. This built on issues outlined in the Fifth Senedd Finance Committee's Legacy Report which sets out further expectations in terms of the presentation of financial information that all Bills should adhere to.



We have recently received the Welsh Government's response to our recommendations on the *Environmental Protection (Single-use Plastics Products) (Wales) Bill*. The Committee was disappointed that in many cases the Minister has "agreed in principle" to provide further financial information requested. However, the preamble suggests that the Minister's officials are assessing the feasibility of updating the original cost and, if they are able to, "any work will take at least six months to complete". Even if the costs will be updated, the Bill is likely to have completed its legislative passage through the Senedd by the time the information is available.

This is simply not good enough. It is unhelpful to receive this information after the Senedd has already agreed to the Financial Resolution. It also undermines the Committee's efforts which, in turn, greatly increases the risk of the Senedd passing bad laws with uncertain financial outcomes that could place significant pressures on already stretched budgets.

We therefore request that Ministers revert to previous practice and provide a written response to the Finance Committee's recommendations prior to the Stage 1 debate and the consideration of a Financial Resolution as a matter of principle. This will ensure the Senedd is able to make an informed decision in relation to committing resources.

I would be grateful if you would circulate this letter to your cabinet colleagues. I am also sending a copy to the Business Committee and Chairs of Policy Committees.

Yours sincerely



Peredur Owen Griffiths MS  
Chair of the Finance Committee

Croesewir gohebiaeth yn Gymraeg neu Saesneg.



We welcome correspondence in Welsh or English.



# Agenda Item 5.4

Rebecca Evans MS  
Y Gweinidog Cyllid a Llywodraeth Leol  
Minister for Finance and Local Government



Llywodraeth Cymru  
Welsh Government

John Griffiths MS  
Chair, Local Government and Housing Committee

15 November 2022

Dear John,

I am grateful to your committee for the consideration you have given to Corporate Joint Committees and how they can be supported to achieve their ambitions. I am sure you will agree partners in local authorities have made impressive progress in establishing these important new vehicles for regional collaboration.

It is of course reasonable to expect there would be a small number of technical issues which only emerged as CJsCs were implemented. As you know, the UK Government has however confirmed it will legislate to admit the four CJsCs into the VAT refund scheme. CJsCs will be eligible to receive a refund of the eligible VAT they incur from the date an Order is made and I am pleased this change to VAT rules is now scheduled to come into force on 10 February, slightly earlier than previously expected. This will resolve this key operational issue for CJsCs and allow Corporate Joint Committees to plan with confidence for the next financial year.

I fully understand the frustration felt by partners at the delay in resolving some of the outstanding issues. These include affording CJsCs the same rights and obligations as their constituent councils in relation to corporation tax as well as enabling CJsCs to be able to borrow from the Public Works Loans Board.

When issues arise from Senedd legislation requiring amendments to UK wide legislation beyond the Senedd's competence, an Order under section 150 'Power to make consequential provision' of the Government of Wales Act 2006 can be developed in partnership with the Westminster Government.

I am pleased to be able to confirm the First Minister has written to the Secretary of State for Wales to formally seek his agreement to take forward a section 150 Order, including to provide for seven technical changes needed to support CJsCs.

I am grateful to the Secretary of State for specifically noting the importance of agreeing the changes which relate to CJsCs as soon as possible in his subsequent response. Whilst UK Ministers must still agree all the proposed amendments to legislation, Welsh Government officials are now discussing these provisions with colleagues in UK Departments as a priority.

Canolfan Cyswllt Cyntaf / First Point of Contact Centre:  
0300 0604400

Bae Caerdydd • Cardiff Bay  
Caerdydd • Cardiff  
CF99 1SN

[Correspondence.Rebecca.Evans@gov.wales](mailto:Correspondence.Rebecca.Evans@gov.wales)  
[Gohebiaeth.Rebecca.Evans@llyw.cymru](mailto:Gohebiaeth.Rebecca.Evans@llyw.cymru)

Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

Unfortunately, we do not yet have a definitive timetable for these changes to be made but I will ensure the committee is kept updated.

I, of course, do not underestimate the challenges partners face given the challenging economic and fiscal position, or the implications this has for the ongoing implementation of CJs. The ongoing support for CJs, through the contributions made by constituent local authorities, is one of the factors considered in determining the overall quantum of the RSG in budget considerations.

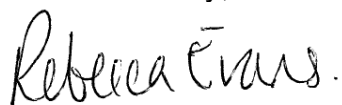
As I have previously set out, I am confident CJs provide a consistent and accountable mechanism to support regional collaboration. This will allow partners to deliver their regional ambitions, develop successful regional economies and encourage local growth in a collaborative and strategic way. This is clearly now more important than ever.

I am pleased that when giving evidence to your committee partners generally recognised how aligning economic development, transport and land use planning approaches in the CJC provides an opportunity to consider and capitalise on the interdependencies between them.

The Welsh Government will continue to work with regions to support them in discharging their planning duties in a way that best suits their specific regional needs. An event is being planned for the New Year with the CJs to discuss the two planning requirements, capacity within the regions to take them forward, and support which might be required to assist them.

I will continue to engage closely with each CJC to explore how the Welsh Government can support their ambitions and help address any challenges they experience.

Yours sincerely,

A handwritten signature in black ink that reads "Rebecca Evans". The signature is written in a cursive, flowing style.

**Rebecca Evans AS/MS**

Y Gweinidog Cyllid a Llywodraeth Leol  
Minister for Finance and Local Government

# Agenda Item 7

By virtue of paragraph(s) ix of Standing Order 17.42

Document is Restricted

# Agenda Item 8

By virtue of paragraph(s) ix of Standing Order 17.42

Document is Restricted



By virtue of paragraph(s) ix of Standing Order 17.42

Document is Restricted