

Agenda – Local Government and Housing Committee

Meeting Venue:

Committee Room 4, Tŷ Hywel

Meeting date: 21 January 2026

Meeting time: 09.30

For further information contact:

Catherine Hunt

Committee Clerk

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Hybrid

Private pre-meeting

09.15 – 09.30

Public meeting

09.30

1 Introductions, apologies, substitutions and declarations of interest

09.30

2 Follow-up inquiry on social housing supply: Evidence session 1

09.30 – 10.30

(Pages 1 – 49)

Wendy Dearden, Senior Policy and Research Officer, Bevan Foundation

Lauren Caley, Policy and Public Affairs Manager, Shelter Cymru

Matthew Dicks, Director, Chartered Institute of Housing

Attached Documents:

Research brief

Paper 1: Bevan Foundation

Paper 2: Shelter Cymru

Paper 3: Chartered Institute of Housing

Break

10.30 – 10.40



Senedd Cymru
Welsh Parliament

3 Follow-up inquiry on social housing supply: Evidence session 2

10.40 – 11.50

(Pages 50 – 63)

Clarissa Corbisiero, Deputy Chief Executive and Director of Policy and External Affairs, Community Housing Cymru

Craig Sparrow, Executive Director of Development, ClwydAlyn

Jim McKirdle, Housing Policy Officer, Welsh Local Government Association

Councillor Andrea Williams, Swansea Council, Welsh Local Government Association

Neil Barber, Executive Director Property & Investment, Codi Group

Attached Documents:

Paper 4: Community Housing Cymru

4 Papers to note

11.50

4.1 Inter-Institutional Relations Agreement

(Page 64)

Attached Documents:

Paper 5: Inter-Institutional Relations Agreement: Letter from the Cabinet Secretary for Housing and Local Government regarding the Inter-ministerial Group (IMG) for Housing, Communities and Local Government

4.2 Inter-Institutional Relations Agreement

(Page 65)

Attached Documents:

Paper 6: Inter-Institutional Relations Agreement: Letter from the First Minister to the Chair of the Legislation, Justice and Constitution Committee regarding the Celtic Heritage Agreement Annual Report

4.3 Social housing supply

(Pages 66 – 70)

Attached Documents:

Paper 7: Social Housing Supply – Written evidence from Crisis

5 Motion under Standing Order 17.42(ix) to resolve to exclude the public from the remainder of this meeting

11.50

Private meeting

11.50 – 12.30

6 Follow-up inquiry on social housing supply: consideration of evidence

11.50 – 12.05

7 Forward work programme

12.05 – 12.20

(Pages 71 – 77)

Attached Documents:

Paper 8: Forward work programme

8 Building Safety (Wales) Bill: consideration of the Welsh Government's response to the Committee's Stage 1 report.

12.20 – 12.30

(Pages 78 – 108)

Attached Documents:

Paper 9: Building Safety (Wales) Bill – Welsh Government response to the stage 1 report

Document is Restricted

Senedd Local Government and Housing Committee Follow Up Inquiry on Social Housing Supply



The Bevan Foundation is Wales' most influential think-tank. We create insights, ideas and impact that help to end poverty and inequality. We are grateful for the opportunity to submit written evidence to the Local Government and Housing Committee's follow up inquiry into the supply of social housing. We provided evidence to the full inquiry and are pleased to see the Committee following this up by considering the progress which has been made on delivering more social homes during this Senedd term.

Over the past two years we have been working with Shelter Cymru and the Lloyds Bank Foundation, looking at how to reduce the use of temporary accommodation by providing more social homes – the only tenure which gives people the security and certainty needed to rebuild their lives after the trauma of homelessness. We have been considering the broad spectrum of policy directives which are at play, from the availability of land opportunities for development, the planning system, the use of existing buildings and the process for allocating social housing.

If you would like to find about more about our housing research, please visit our website at www.bevanfoundation.org/focus/housing

Our Senior Policy and Research Officer, Wendy Dearden, can also be contacted about this work by email at wendy.dearden@bevanfoundation.org

As requested, this written response provides a summary of the key points we would like to bring to the Committee's attention.

Work underway to meet the current 20,000 target and to ensure a pipeline post-2026

In our response to the full inquiry, we said that:

- a more tightly focused target, concentrating delivery on homes to be let at a social rent, is needed to address the blockages in our housing system.
- greater insight is needed into how many homes are being removed from the social housing stock as additional homes are only part of the story.

Our position on the focus of the target has not changed and we have conducted analysis of the delivery statistics to reveal the number of additional homes for social rent which have actually been created:

- By April 2026 **18,652 homes will have been delivered** towards the 20,000 homes target.
- **Only 15,726 of these (84%) will be provided at a social rent** – the rest being shared ownership or intermediate rent.

Whilst 15,726 more homes at social rent have been delivered, the true number of **additional** homes at social rent is smaller.

- The latest delivery numbers include 1,072 existing social homes which have been long term voids, brought back into use through TACP capital funding.
- They are also only part of the story with an estimated 651¹ social homes lost from the stock due to market sales during the period of the target – one for every 23 new social homes delivered.
- Based on these figures (15,726 minus 1,072 voids minus 651 sales) the number of **additional** social homes is likely to stand at around 14,003.
- This is the equivalent of one for every 7 of the 94,000 households currently waiting for a social home.²

The Bevan Foundation fully recognises the considerable challenges that have been faced in developing new homes during this Senedd term³, and is not aiming to detract from that. If anything, these challenges intensify the importance of greater insight and regulation of homes being lost from the existing stock.

Reflecting on the spirit of the original target setting, we do not agree with the Affordable Housing Taskforce recommendation⁴ that long term voids should be included in the delivery figures. While the use of TACP funding to bring this property back into use is understandable, these are not **additional** social homes. Greater transparency is also needed on the length of time a property has been empty, and the extent of the works required for it to be eligible for TACP funding.

The delivery target for the next Senedd term must be focused solely on the delivery of new social homes and action is needed to stop much needed social homes being lost from the stock.

Progress towards implementing the recommendations of the Affordable Housing Taskforce

It is difficult to comment from an outside position on the progress which has been made on implementing the taskforce's recommendations. The taskforce's report was published in May last year⁵ and an announcement was made by the Cabinet Secretary in June⁶ that an implementation group would be established. The Cabinet Secretary provided an update in Plenary in November⁷ saying that "good progress" is being made.

We believe that the implementation group should publish a progress report before the end of the Senedd term.

¹ 521 social homes sold during the first four years of the Senedd term plus a further 130 for 2025-26 based on the previous years.

² [Waiting for a home: An update on social housing waitlists in Wales - Shelter Cymru](#)

³ [Why is it harder than ever to develop social homes? - Bevan Foundation](#)

⁴ [Affordable Housing Taskforce: report and recommendations \[HTML\] | GOV.WALES](#)

⁵ [Affordable Housing Taskforce: report and recommendations \[HTML\] | GOV.WALES](#)

⁶ [Written Statement: Affordable Housing Taskforce Recommendations – Implementation \(26 June 2025\) | GOV.WALES](#)

⁷ <https://record.senedd.wales/Plenary/15436#A102587>

The extent to which work to increase supply is being undermined by other policy goals

Both the sale of social homes and existence of long-term voids in the social housing stock are fuelled, at least in part, by the aspirations of the Welsh Housing Quality Standard 2023, and in particular, the need to have a plan to bring the energy efficiency of all existing social homes up to EPC A.

For many social landlords, investing in their stock to reach the required standards will need to become their priority and new development rates are likely to fall as a result.

The Bevan Foundation is currently researching the challenges of tenure changes – that is, acquiring existing private sector dwellings at scale to boost the supply of social homes. These challenges include technical requirements such as the size of rooms, outdoor space or changes in floor levels which can make a property unsuitable for purchase. The potential future investment requirement for an acquisition to meet EPC A can also make it unviable.

TACP funding allows for a property to be sold after 10 years if it cannot meet the required standards. We have however heard from a number of landlords that this is not something which they would want to consider at scale. It introduces an unknown risk of sale and does not support long term business planning.

We believe that it is time to reconsider the WHQS standards and consider what is needed now to boost social housing delivery significantly. It is very hard to justify to a homeless family living in one hotel room that homes are not being brought into the social housing stock because, for example, a bedroom is a few centimetres too small.

This must be a priority area for the next Government, taking a pragmatic view on what needs to be achieved first. While decarbonisation of the housing stock in Wales must be taken forward, we believe that there are alternative approaches that could enable the greater delivery of new social housing alongside meeting decarbonisation goals across all tenures.

How the Welsh Government is developing its strategic role in relation to land

Again, we are commenting from the outside on the recent activities of Welsh Government in relation to land. We note the Cabinet Secretary's updates⁸ on land purchases at Cosmeston and Porthcawl and that she has met with health boards and other public bodies on the availability of land.

The Bevan Foundation's housing manifesto⁹ calls on the next Welsh Government to create a national development corporation to drive and deliver homes at scale, to include the strategic assembly of sites.

There are many challenges to delivering social homes at scale, from the supply of suitable land to the cost of construction and delays in the statutory consent process. Most developments are currently led by individual landlords and more could more be done at a pan-Wales level to reduce risk and boost the number of homes being delivered. With

⁸ <https://record.senedd.wales/Plenary/15436#A102587>

⁹ [Getting-people-out-of-temporary-accommodation-BF-L1224-15098.pdf](#)

pattern books being developed for social homes, now is the time for a decision about whether volume building of standardised homes is best led by a strategic body.

We are in the process of reflecting on lessons to be learnt from the national action take to radically boost supply post-WWII, as well as the work of Homes England as a housing and regeneration agency.

The availability of finance

As we commented in our response to the full inquiry:

- The development of affordable, subsidised homes needs subsidy,
- It is simply not practical, let alone ethical, to rely on social rent payments by some of the poorest people in Welsh society to fund the development of new homes.

Last year's consultation on the new social rent standard¹⁰ was a reminder of the ongoing tension between the need to keep rents affordable for tenants as well as raising the income which social landlords need to meet Welsh Government refurbishment and development aspirations. In the Bevan Foundation's response, we highlighted the lack of transparency around social housing rent payments being used for new housing development.

The cost of living crisis highlighted the pressures that the social housing sector can face when economic conditions don't allow for above inflation rent rises. The Bevan Foundation believes that there is therefore a strong case to review social housing financing in the round, particularly for new development, and to consider what other ways could there be to fund the sector.

We are also concerned about the fragility of a model for funding new homes which relies so heavily on the payment of rent through the UK social security system. A significant proportion of social housing tenants have been shielded from the impact of above inflation rent rises due to the fact that their rent, or a proportion of it, has been paid via Housing Benefit or the housing element of Universal Credit.

Given that powers over these benefits have been reserved to Westminster, a future UK Government could make significant changes to these benefits that would have a detrimental impact on the ability of Welsh social housing tenants to afford their rents, and on the financial position of social landlords.

In terms of affordability, JRF recently highlighted¹¹ that Welsh social rents are already much close to market levels when compared to England. TPAS Cymru have also reported¹² that only 42% of tenants now consider their rent to be affordable, a sharp decline from 78% in 2023.

Given these concerns, a comprehensive review of the financing of social housing is needed. While there has been progress in exploring innovative finance models, this is not taking place at scale. There are may also be opportunities to make better use of tax raising powers on property and land to provide additional revenue.

¹⁰ [A new rent and service charge standard for Wales | GOV.WALES](#)

¹¹ [Balancing act: a strategic approach to rent setting in Wales | Joseph Rowntree Foundation](#)

¹² [Tenant Voice on Rent and Affordability](#)

Shelter Cymru written evidence to the Senedd Local Government and Housing Committee Follow Up Inquiry on Social Housing Supply

January 2026

If you would like to discuss this response further, please contact policyandresearch@sheltercymru.org.uk

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 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.

The importance of homes for social rent

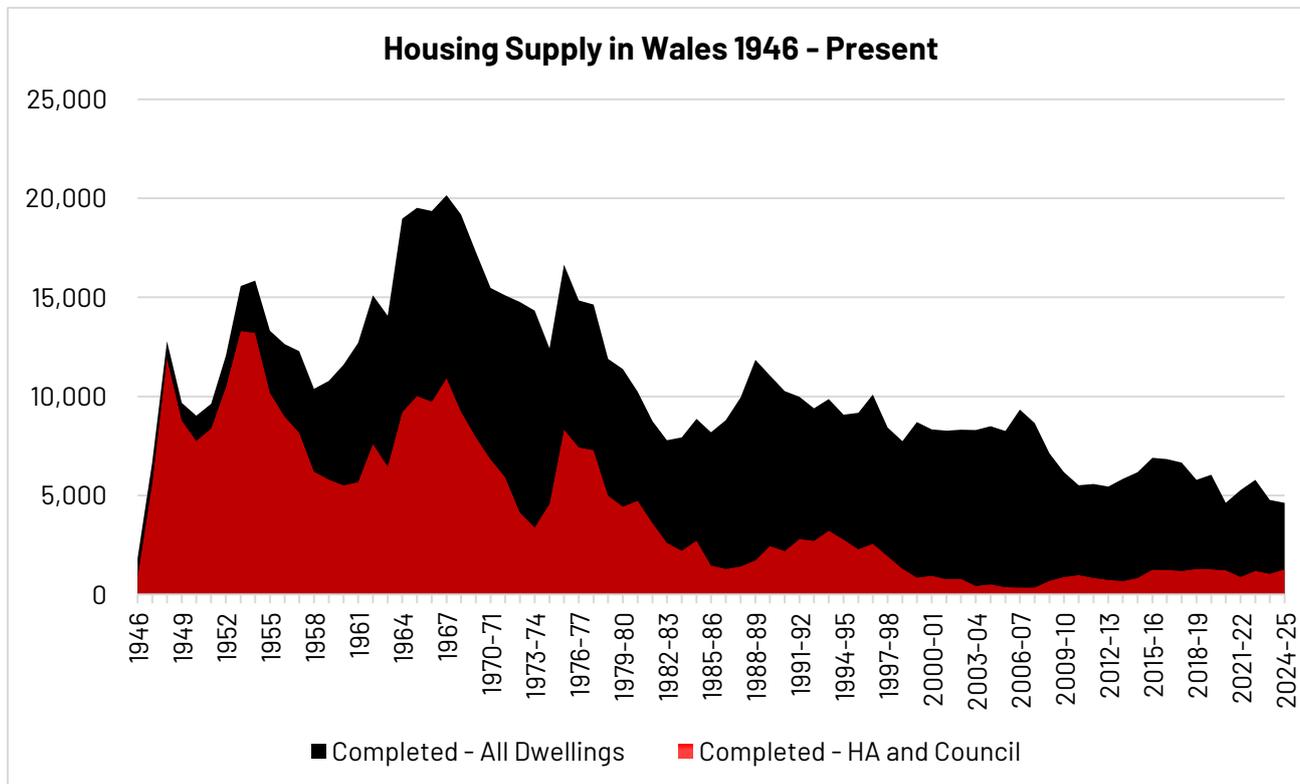
Shelter Cymru believes that any possible solution to the housing emergency must include a significant increase in the number of social rent homes in Wales.

Social rent homes are affordable by design, with rents linked to local incomes not out-of-control housing markets. Social rent homes offer stability by providing people with secure lifetime tenancies from a landlord who isn't looking to make a profit.

But for decades we've failed to build the social homes we need. Right now, 1 in every 14 households in Wales is waiting for a social home and, if we carry on at the rate we're going, it will take more than 35 years to provide a home to everyone waiting.

Put simply, we cannot allow this to happen. Not least because we know the difference that a social rent home can make, something we've outlined recently by sharing Karen's story: ['One of the best days of my life' – Mum-of-two Karen describes moment she got keys to her social home.](#)

We also know from experience that Wales can do more, as following World War II Wales, like the rest of the UK, embarked on a social and council housing building programme that saw average completions between 1946 and 1980 of almost 7,500 per year.



Response

Work underway to meet the current 20,000 target and to ensure a pipeline post-2026

There is much to celebrate in the latest social home delivery figures. Delivery has ramped up by 12% in 2024/25 and this reflects the commitment to delivery made at the beginning of this Senedd.

Shelter Cymru recognise the challenging environment that this progress has been achieved in. With delivery impacted by the Covid-19 pandemic, significant increases in the cost of building homes and the ongoing need to also invest in other vital policy areas. Despite these challenges, delivery of social rent homes in Wales exceeded any region in England in 2024/25, including London and the South East of England.

We also commend the Welsh Government's clear prioritisation of social rent homes. While other products are counted towards the target, the bulk of delivery has been social rent homes. This is welcome as Shelter Cymru are clear that investing in social rent homes is at the heart of ending the housing emergency. They are not just a more affordable option but come with a level of security and access to support that no other housing product provides.

Despite this success, we do continue to urge against treating this target as an objective in and of itself. Ending the housing emergency and making homelessness rare, brief and non-repeating must continue to be the objective that this, and future social home targets, are supporting.

We also know that the demand for social rent homes in Wales far exceeds 20,000. In 2024/25, Shelter Cymru worked with local authorities across Wales to understand their waitlists for social rent homes and present the scale of nationwide demand. Our report, *Waiting for a Home*, found that there are currently over 94,000 households (constituting more than 170,000 people) in Wales waiting for a social rent home.¹

Each of these households has unique experiences and reasons for believing that a social rent home is the right option for them and their family. From our casework we know that for many privately rented homes are increasingly unaffordable, families are living in overcrowded conditions and cannot afford a right-size home on the private market, and thousands of households are already homeless and stuck in temporary accommodation or unstable sofa surfing.

As such, we continue to treat the 20,000 home target as a KPI that the Welsh Government should use to measure progress, but with an acknowledgment that this is a starting point rather than an end in of itself.

While there is much to welcome in the increased delivery of social rent homes in this Senedd term and we would like to see greater transparency about the future pipeline that this Government has built. Ongoing delivery can and must be supported by taking stock of lessons learnt in working towards this target – including an understanding of how some barriers were overcome and work underway to address persisting challenges.

While 20,000 homes was always an ambitious target the situation in Wales and the UK more broadly has clearly worsened over the last five years. What was considered ambitious five years ago should now be considered the bare minimum of delivery for the seventh Senedd if we are to achieve the overarching ambition of ensuring a safe, secure, genuinely affordable and adequate home for everyone in Wales. This is why, ahead of the Senedd election, we are calling for all political party's to commit to delivering a year on year increase in the supply of social rent homes.

Progress towards implementing the recommendations of the Affordable Housing Taskforce

As an organisation, we haven't followed the implementation of all recommendations put forward by the taskforce closely so in our evidence we will focus on those most relevant to our

¹ See: Shelter Cymru, [Waiting for a home: An update on social housing waitlists in Wales - Shelter Cymru](#)

work at Shelter Cymru. We also do not believe that there has been a formal update on the progress of the recommendations.

We are aware that recommendation 21 has been taken forward and void social rent homes, in need of significant repair, that are brought back into use by TACP funding are now being counted towards the 20,000 social home target. Shelter Cymru recognise that this has created a level of controversy around the reporting and appreciate why others are looking to highlight this.

As an organisation that roots its policy work in the experiences of our clients, we seek to take a pragmatic approach and focus on whether or not steps take us towards the ultimate goal of ending the housing emergency. For this reason, we are hugely supportive of both TACP as a programme and of the specific use of these funds to ensure that certain void properties can return to use as social rent homes. However, we recognise that including those properties in reporting against the 20,000 target appears to involve an expansion of the aims of the 20,000 low carbon social homes target as it was initially set out.

This being said we would note that the Welsh Government have been transparent in their reporting and that has enabled organisations like ours to have these conversations and to disaggregate the figures as needed. Moving forwards, it may be prudent to publish figures on voids brought back into use through TACP, and potentially social rent homes delivered through acquisition, as separate but connected to “new social home delivery” reporting. At the same time, we would encourage the Welsh Government to report net additional social rent homes as opposed to overall supply of ‘new’ social rent homes. That approach would take into account disposals and demolitions thus giving us a clear picture of the change in overall supply of social rent homes each year.

Recommendation 23 looks to address the barriers that WHQS may be creating when it comes to increasing delivery of social rent homes. We are unsure how this recommendation is progressing, but Shelter Cymru have upcoming research that may support future steps in this area. As part of our partnership work with the Bevan Foundation, funded by Lloyds Bank Foundation, the peer research team at Shelter Cymru will shortly be entering an extensive listening phase with current and prospective social tenants, particularly those living in temporary accommodation, with conversations focussed on both allocations and standards. Part of the aim of this work is to understand the priorities of social tenants or people waiting for a social rent home and how this might inform a pragmatic approach to standards that balances the need for good quality homes with the scale of the housing emergency. We would be happy to provide an update on this work from September 2026.

The extent to which work to increase supply is being undermined by other policy goals

In this section we have focussed our response on issues of housing policy. However, we recognise that the nature of the Welsh Government budget means that investment in different policy areas involves consideration of investment in others as well.

As the Affordable Housing Taskforce report sets out, Registered Social Landlords (RSLs) and local authorities have both fed back that they feel WHQS in its current form is creating challenges as they work to increase supply of social rent homes. We understand the Welsh Government has disagreed with the need for more flexibility in this area, however, as it is an issue that continues to be raised we believe that further clear and transparent communication is needed to achieve progress on this issue.

However, we cannot overlook that RSLs have a legal responsibility to meet WHQS and potentially will also have legal responsibilities in line with Wales' Net Zero ambitions. In contrast, their decision to be part of the solution to the housing emergency through supporting the delivery of social rent homes is rooted in their values and a sense of moral, not legal, obligation. Similarly, the legal responsibility of local authorities is rooted in preventing and relieving homelessness, not in the delivery of social rent homes.

We have recognised that at times when RSLs are facing significant financial pressures, they are likely to prioritise meeting their legal responsibilities over other areas.

A challenge facing the Welsh Government in its broader ambition to make homelessness rare, brief and non-recurring, which social rent home delivery is very much a part of, is the limitations of devolved authority and the impact of Westminster-policy. In the context of social rent home delivery, one policy creating particular challenge is the so-called "bedroom tax".

The "bedroom tax" creates an artificial demand for one-bed homes that has the potential to skew delivery in Wales away from what is best in the long-term. In addition, this is a policy which directly leads to extended stays in temporary accommodation for households whose eligibility for a social rent home is restricted only to one-beds.

Stays in temporary accommodation, particularly extended stays, are harmful to people's health and wellbeing and also come at substantial cost to local and national government. The annual cost of meeting demand for temporary accommodation currently believed to be £100million net cost to local councils and £170million gross cost in Wales.² The "bedroom tax" alongside the limited supply of social rent homes contribute to the crisis of temporary accommodation we are currently witnessing.

While the Welsh Government will be unable to directly address this policy there are areas of Wales which are beginning exploring innovative approaches to limit the impact of this

² See: Shelter Cymru, [The Cost of Crisis: The Impact of Wales' Reliance on Temporary Accommodation - Shelter Cymru](#) ; Audit Wales, [Temporary accommodation, long-term crisis?](#)

Westminster policy and reduce the amount of time people are stuck in temporary accommodation. We hope to see learning and approaches shared to improve options available across Wales.

How the Welsh Government is developing its strategic role in relation to land

Others providing evidence will be better placed than Shelter Cymru to speak to the detail of this. In broad terms, we do feel that there is a clear strategic and coordination role for the Welsh Government to play with regard to land assembly and potentially master planning if we are to deliver social rent homes at the scale and pace needed.

The availability of finance

This is not our specialist area of expertise, but we would draw attention to the wealth of evidence around investing in social rent homes as a route to achieving savings across the public sector. Work from thinktanks, the third sector, public bodies and Welsh Government themselves all supports this.

The question we have yet to answer is how Wales will manage the costs of business-as-usual demands alongside funding the changes that we have strong evidence will deliver better outcomes for people and savings for public spending. Wales' block grant makes funding both streams simultaneously incredibly challenging.

Securing adequate finance must be a priority for the seventh Senedd if we are to provide the homes needed in Wales and the route to this will likely lay in conversations between the Welsh and UK Governments around options for additional grant funding or increased borrowing powers in Wales.

We would remind both Governments that any such funds would benefit the UK as a whole given the porous borders between our nations. Investment in the construction workforce in Wales will support delivery of homes across the UK. Similarly, an uplift to the Welsh economy and a boost to the skills and employment opportunities of adults and young people in Wales will both also benefit the wider UK.

We also recognise that there has been significant interest in recent years in 'innovative financing' models for delivering social rent homes, including the possibility of pension funds as investors given the long-term returns that can be achieved through investment in this sector. While we understand the desire to explore all available avenues for financing social rent homes we do urge caution. At their heart, social rent homes are something that benefit us all, and as such a focus on delivering homes with the minimum private finance should be a priority.

Issues relating to planning

Others providing evidence will be better placed than Shelter Cymru to speak to the detail of this. However, we are well aware of the issues that have been created over many years through the underfunding of local authority planning departments. For major developments in particular – the kind that a local authority is unlikely to deal regularly with – the development of significant centralised or shared specialist resource to bolster departments is something that should be considered.

Progress on developing the workforce

Others providing evidence will be better placed than Shelter Cymru to speak to the detail of this. However, Shelter Cymru do feel it is important to acknowledge the role of social rent home delivery in protecting the workforce needed to deliver homes across tenure.

We know from experience that for-profit, market based, housebuilding often reduces during periods of economic downturn or uncertainty, something that appears to be happening currently in both Wales and the wider UK. From the perspective of private developers this approach is completely understandable, however, it is inevitable that such an approach places many jobs in housebuilding at risk. Should those jobs be lost or should business that are generally subcontracted by major housebuilders be forced to exit the market then it is inevitable that overall development capacity in the housebuilding sector is also reduced due to lost skills.

At times like this investment in the delivery of social rent homes offers a vital safeguard to retain skills and by extension development capacity.

This approach also reflects the fact that demand for social rent homes is broadly counter cyclical, meaning that during times when the economy means private development is less likely to happen the demand for social rent homes actually increases.

In recent years UK nations demonstrated a clear understanding of the responsibility of the state to invest to protect workers and retain skillsets in times of extended downturn through the response to the Covid-19 pandemic. Furloughing staff protected workforces and came at significant expense. Similarly, investing in social rent homes in poor economic environments both protects the workforce and delivers much-needed homes.

Additional Information

If you have any questions about this consultation response please contact Lauren Caley, Policy and Public Affairs Manager, at laurenc@sheltercymru.org.uk.

CIH Cymru response to the Local Government and Housing Committee follow up inquiry into housing supply.



Introduction

CIH Cymru welcomes the opportunity to respond to the committee's follow up inquiry into social housing supply in Wales. This follow up inquiry comes at a time when the housing crisis in Wales is continuing to deepen with the visible impacts being rising homelessness and increasing levels of unaffordability in the private rented sector. It is vital that we ensure that there is an adequate supply of social homes in Wales to not only tackle the housing crisis but to rebalance the market to ensure the people of Wales can access a safe, suitable and affordable home in a tenure of their choosing as part of a vision of an equitable Wales for this and future generations.

Work underway to meet the current 20,000 target and to ensure a pipeline post-2026

Whilst it is unlikely that the 20,000 target will be met in this Senedd term we would like to acknowledge the work our social housing providers have undertaken to deliver 13,399 additional affordable homes between April 2021 and March 2025¹. We are also encouraged by the fact that according to the latest Welsh government data release local authorities delivered 849 additional affordable homes in 2024-25.¹ Visible success of the partnership work being undertaken by the local authority development programme.

The additional homes developed this Senedd term have provided 13,399 households with a safe, secure and affordable home at a time when social housing providers are facing rising costs, ongoing delays to the planning system. high

¹ Affordable housing provision: April 2024 to March 2025. <https://www.gov.wales/affordable-housing-provision-april-2024-march-2025-html#:~:text=In%202024%20to%202025%2C%203%2C643,sector%20during%20this%20government%20term.>



inflation and constraints to the supply chains. Without the dedication of development teams across housing associations and local authorities these homes could not have been delivered. Yet despite this we also need to acknowledge that the 20,000 low carbon homes at social rent target is unlikely to be met by the end of this Senedd term.

Respondents to our series of Sector Snapshots have been clear that they are unsure or have no confidence that the 20,000 low carbon social homes target will be met with 83 per cent of respondents having this level of confidence in the target being met in our 2025 sector snapshot survey. When we consider the seniority of respondents 83 per cent of respondents in a senior level position did not have confidence the target would be met which is concerning considering the strategic oversight these housing professionals would have. The reasons given for this low level of confidence are a lack of funding, ongoing issues with the planning system, skills shortages a lack of land and the ongoing cost of ensuring existing homes are brought up to Welsh Housing Quality Standards².

We welcome the setting up of the affordable housing task force by Welsh government to look collectively at how delays in the planning system, land assembly and skills shortages in the construction sector can be overcome to increase the pace and scale of development. Whilst ensuring that we have an adequate pipeline of development to ensure we can develop the homes we need at pace and scale to end Wales's housing crisis.

Yet this work to ensure that we have a new pipeline of homes must be done alongside a new calculation of housing need in Wales to ensure that the number of planned homes will actually help meet the rising demand for a social or affordable home in Wales. The latest calculation of housing need was published in August 2020 and was based on 2018 household projections³. That assessment

² Sector Snapshot 2025: Survey of housing professionals in Wales. <https://www.cih.org/media/apsh1sir/cih-cymru-2025-sector-snapshot-english.pdf>

³ Estimates of housing need: 2019-based. <https://www.gov.wales/estimates-housing-need-2019-based>



estimated that between 6,200 and 8,300 additional homes would be required annually, and of those figures, between 3,100 and 4,500 would need to be affordable homes made up of intermediate rent and social renting⁴. Whilst we did deliver an additional 3,643 additional affordable housing units in 2024/25, we would question whether this is enough given that in the summer of 2024 there were 94,000 households waiting for a social home in Wales⁵. This is coupled with 13,287 households becoming homeless in 2024-25 and on March 31, 2025, there were 6,285 households living in temporary accommodation⁶. Some research has shown that based on the 2023-24 figures for affordable housing delivery it could take up to 35 years to provide a social home for everyone waiting for a home⁵.

Any calculation of housing need cannot just be about volume, we also need to establish the size and types of homes that need to be delivered to ensure everyone in Wales can access a safe, suitable and affordable home. When speaking to members we often hear that there is a significant shortage of one bed and larger four bed plus homes. We also need to consider how as a sector we meet the needs of households who need an adapted home. Concern has also been raised by our members that the calculation of unmet need is not accurate as the ongoing shortages of social housing may result in people not applying for a social home as they do not think they will be able to secure one. Audit Wales has also expressed concern that the definition of unmet need does not include those households looking for an alternative home as their current home is no longer suitable for their needs.

So, whilst we need to tackle the structural challenges to development from planning delays, the price of land, a lack of skills we also need to ensure that we are also building a sufficient number of homes of the right size and type to end the

⁴ Estimates of housing need: 2019-based. <https://www.gov.wales/estimates-housing-need-2019-based>

⁵ Waiting for a home. An update on social housing waitlists in Wales. <https://sheltercymru.org.uk/wp-content/uploads/2025/04/Waiting-For-a-Home-1.pdf>

⁶ Homelessness: April 2024 to March 2025. <https://www.gov.wales/homelessness-april-2024-march-2025-html>

housing crisis. We need the data to inform this which must come from a recalculation of housing need in Wales.



Chartered
Institute of
Housing
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Progress towards implementing the recommendations of the Affordable Housing Taskforce

CIH Cymru now sits on the Cabinet Secretary's sector-wide group looking at the implementation of the Affordable Housing Taskforce recommendations.

We also host the Welsh Government's Local Authority Development Programme which has seen local authority completions rise from around 200 per annum at the start of the project in 2019/20 to around 800 per annum in 2024/25. Many strands of that work in the LADP feed directly into the delivery of many of the recommendations outlined by the Taskforce.

We welcomed the taskforce recommendations at the time of the report, and there was nothing in those recommendations that we didn't recognise, support, and are actively working with colleagues and partners to implement.

However, whilst the initial aim of the taskforce was to identify some short-term blockages in reaching the Welsh Government's 20,000 social homes target, in many respects it merely confirmed that many of the barriers to developing social and affordable homes at the pace and scale we need in order to end our housing and homelessness emergency were, and remain, structural and systemic, and that we need a systems reset, accompanied with a significant increase in investment in terms of capital, skills and supply chains if we are to turn things around. This is a much longer-term approach that will take us into the next Senedd term.

That said, the implementation group has focused minds and moved some key short-term elements forward at perhaps a quicker pace than was previously the case.



For example, work is now underway between stakeholders in terms of pulling together a more uniform approach to S.106 through a template approach; the Homes and Places Portal has been developed further making it a more reliable single-source destination for data, agreement was reached to use Transitional Accommodation Capital Programme (TACP) funding to bring voids back into use; the Welsh Government's Empty Homes Guide book providing more guidance on how to use empty properties.

Longer-term projects and approaches continue to be developed and at the time of writing this paper, CIH Cymru awaits a decision by the Cabinet Secretary about whether to continue to fund the Local Authority Development Programme beyond March, 2026. Given the results that the programme has delivered (as outlined in the second paragraph of this section) we would urge her to approve the funding. We also await outcomes of decisions about whether to move forward with the Wales Development Academi Project which aims to support attempts to plug the skills gap in development teams, specifically in developing local authorities but also across RSLs as well.

The extent to which work to increase supply is being undermined by other policy goals

There are a couple of policy goals that are likely to or are currently impacting the work to increase the supply of social homes in Wales. Firstly, some respondents to our 2025⁷ sector snapshot survey outlined that the level of funding allocated to the Welsh Housing Quality Standard and developing new homes is insufficient summed up by this quote from one respondent:

Capital funding is insufficient to meet target, partly due to inflationary pressures in the house building sector but also insufficient to deliver our

⁷ Sector Snapshot 2025: Survey of housing professionals in Wales. <https://www.cih.org/media/apsh1sir/cih-cymru-2025-sector-snapshot-english.pdf>



reserve schemes for another three years due to programme being fully committed. The Council's own development programme is over-committed as it is, and the costs associated with WHQS23 will further stifle development potential."

Welsh government has allocated the housing sector with £96.9 million for decarbonisation in the 2026-27 draft budget⁸. Whilst this investment is welcomed we have outlined in our Housing Strategy for Wales that significantly more investment is needed to decarbonise our existing social homes. research undertaken by the New Economics Foundation outlined that the total investment needed to decarbonise our social housing stock in Wales would be £5.52 billion over 10 years with an estimated funding gap of £2.7 billion at the time the report was published in 2021⁹. Using the Bank of England's inflation calculator¹⁰ the total level of investment, from government and private finance, at today's prices needed to plug the funding gap would likely be closer to £3.28 billion over ten years or around £328 million per annum.

The New Economic Foundation report went on to outline that Welsh Government would need to invest £1.7 billion over that 10-year period, around £170 million per annum⁹. Using the same Bank of England inflation calculator¹¹, the investment from Welsh government would now need to be in the region of £2.1 billion over a ten-year period. Around £210 million per annum in today's prices.

We also need to ensure that our social housing providers in Wales are provided with the right level of investment to decarbonise our existing homes so that they do not have to make decisions around whether to develop more homes or to prioritise decarbonising existing homes. According to research by Savills housing

⁸ Draft Budget 2026 to 2027. <https://www.gov.wales/draft-budget-2026-2027>

⁹ Financing Wales' Housing Decarbonisation. <https://www.greenfinanceinstitute.com/wp-content/uploads/2024/06/Financing-Wales-Housing-Decarbonisation.pdf>

¹⁰ Inflation calculator. <https://www.bankofengland.co.uk/monetary-policy/inflation/inflation-calculator>

¹¹ Inflation calculator. <https://www.bankofengland.co.uk/monetary-policy/inflation/inflation-calculator>



providers in England are already making these decisions with 95 per cent of providers prioritising funding for existing homes over developing new homes¹².

Secondly in our oral evidence to the committee as part of the scrutiny of the Building Safety (Wales) Bill we outlined that the implementation of the provisions in the bill need to be planned out to ensure that the bill does not cause delays to developing the homes we need¹³. This was echoed by other participants in the scrutiny process who outlined that whilst the bill would not necessarily impact the supply of new homes it could slow down the pace of development due to a potentially longer pre-contract process¹⁴.

Other respondents outlined that the Bill could impact the level of supply in Wales. Either through landlords selling properties that would be costly to remediate, landlords choosing to leave the market due to the complexity of the regulations or reductions in operating margins impacting their ability to borrow private finance to help develop the homes we need. There were also concerns that implementing the bill could take the attention of senior staff members away from the strategic planning of delivering the new homes we need¹⁴.

Our evidence and evidence from other participants seem to suggest that to ensure that this much needed piece of legislation does not impact the ongoing supply of social homes we need to ensure we have the right size of workforce to implement the Bill. We will return to this later in our response.

Ultimately, we need to ensure that Welsh social housing providers have the right level of funding to meet all policy priorities if we are to develop the homes, we need to end Wales's housing emergency.

¹² The perfect storm. https://www.savills.co.uk/research_articles/229130/346705-0

¹³ <https://record.senedd.wales/Committee/15630#A99503>

¹⁴ Building Safety (Wales) Bill Stage 1 Report. <https://laiddocuments.senedd.wales/cr-ld17594-en.pdf>

How the Welsh Government is developing its strategic role in relation to land



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Whilst the affordable housing taskforce report does contain a recommendation for Welsh government to develop a pipeline of suitable available land with custodians of public land there is scope to go further. The independent review of affordable housing supply, published in 2019 and authored by Lynne Pamment, outlined that there is a need in Wales for the establishment of an arm's length body to act as a hub for public sector land management and professional services. The aim of the body being to provide the capacity and resources to accelerate the development of publicly owned land in Wales and help provide the skills¹⁵ needed to develop that land at the pace and scale needed to end our housing emergency.

The Plaid Cymru and Welsh Labour cooperation agreement also outlined that a national construction agency would be established to improve the supply of social and affordable homes¹⁶. Yet rather than establishing this arm's length agency Welsh government has set up the land division. Whilst the Land division has begun to deliver some parcels of land for development, we don't believe it has happened at the pace and scale envisaged by the Lynne Pamment review.

When speaking to our members it is clear that we need a mechanism/body in Wales to bring together, at a strategic level, all the component parts required to deliver new social and affordable housing at pace and scale. As developing homes is not just reliant on land availability it also depends on planning, finance, supply chains and having the right skills. An arm's length development corporation/agency will include managing the availability of land, enabling the use of vacant land, working to overcome constraints in the planning sector, help overcome skills gaps and establish an effective supply chain for Wales. Most importantly, is take the strategic role of land supply and development beyond the vagaries of political cycles, thus providing more certainty to social landlords and

¹⁵ Independent Review of Affordable Housing Supply. https://www.gov.wales/sites/default/files/publications/2019-04/independent-review-of-affordable-housing-supply-report_0.pdf

¹⁶ The Co-operation Agreement 2021. <https://www.gov.wales/sites/default/files/publications/2021-11/cooperation-agreement-2021.pdf>



developers alike. This is why an arm's length development corporation is a key strategic policy aim in our housing strategy for Wales¹⁷. It should also be key to Welsh government's strategic approach to freeing up land to develop the homes we need.

The availability of finance

Welsh government has over the last Senedd term provided record levels of investment to meet the target of delivering 20,000 homes at social rent by 2026. Yet despite this record level of investment Audit Wales in their report on affordable housing delivery outlined that an additional £580 million to £740 million could be needed in order to deliver all the homes currently in the pipeline and meet the 20,000 low carbon social homes target¹⁸.

Yet grants from Welsh government are not the only funding sources for social housing providers looking to develop homes. Research by Savills and CHC outlines that borrowing makes up 33 per cent of development funding and private capital markets makes up 16 per cent of development funding¹⁹. Yet these sources of funding are subject to shocks to the wider UK markets and changes to interest rates. Interest rates for social landlords have increased from 3.75 per cent in April 2022 to 5.5 per cent in June 2023. For local authorities, the rates rose from 2.5 per cent to 3.87 per cent over the same period²⁰. The inflation rate high of 11.5 per cent is also now baked into the UK economy²¹.

¹⁷ Wales Housing Strategy. <https://www.cih.org/media/udzfdit/0416-wales-housing-strategy-english-web.pdf>

¹⁸ Affordable housing. <https://www.audit.wales/sites/default/files/publications/Affordable%20housing%20-%20Eng.pdf>

¹⁹ Economic Impact of Welsh Housing Associations. https://chcymru.org.uk/cms-assets/documents/Socio-economic-impact-of-Welsh-Housing-Associations_Economic-impact_Dec25.pdf

²⁰ Affordable housing. <https://www.audit.wales/sites/default/files/publications/Affordable%20housing%20-%20Eng.pdf>

²¹ Annual Inflation rates

<https://www.ons.gov.uk/generator?uri=/economy/inflationandpriceindices/bulletins/consumerpriceinflation/june2025/d615b094&format=xls>



In addition, construction costs have risen by 33 per cent since the pandemic²² and the building cost information service (BICS) is predicting that building costs will increase by a further 15 per cent over the next five years²³. These cost pressures combined with new building standards have caused a 75 per cent increase, between 2020/21 and 2023/24, in the grant needed to develop a new general needs property.

If we are to develop the affordable homes we need, our social housing providers need a grant settlement that enables them to mitigate the ongoing cost of development and high interest rates which will impact their ability to borrow the private finance needed to develop social homes. Our social housing providers are committed to developing the homes we need but need an appropriate level of investment to achieve this.

We also need to look at other ways we can finance the development of the homes we need at pace and scale. Options such as the introduction of land value capture or a land value tax of some sort should be considered as a key part of a suite of financial products for further investment into developing the social homes, we need in Wales. Indeed, Land Value Capture and some form of Land Value Tax has been in the Welsh Government's line of sight for a number of years now. It's an option that was initially floated in the form of the proposed Vacant Land Tax from Welsh Government as one of the proposals for new taxes when tax raising powers were devolved to Wales by the 2014 and 2017 Government of Wales Acts. In fact, a Vacant Land Tax was championed by former Forst Minister Mark Drakeford, when Finance Minister in Carwyn Jones's administration. CIH Cymru would welcome a reevaluation of the introduction of such an approach to increase investment into social and affordable housing in Wales.

²² Welsh Housing Market and Supply Update November 2023. https://www.savills.co.uk/research_articles/229130/354555-0

²³ BCIS building forecast. <https://bcis.co.uk/news/bcis-construction-industry-forecast/>



We also need to consider the role the development bank of Wales can play in providing low-cost loans to the housing sector as an alternative borrowing stream to enable development at pace and scale. Consideration should also be given to how we can develop the social homes we need with minimal or no grant intervention.

One example of development of social homes without grant intervention is Tirion homes²⁴ which was set up in 2012 by Welsh Government and the Principality building society to deliver affordable housing across Wales using an innovative finance model that negated the need for grant funding. The sites currently under development are a mix of, market sale, low-cost home ownership, intermediate rent, market rent and social housing. The schemes developed by Tirion homes are low carbon, meet WHQS space standards and seek to promote community cohesion through a tenure blind approach to design and a focus on engagement²⁵.

. CIH Cymru believes that a step-change needs to take place in where housing is placed on the policy priority list in Wales. We believe the mechanism to achieve that is to incorporate the right to adequate housing into Welsh law, which CIH Cymru has been campaigning for along with partners Shelter Cymru and Tai Pawb. We believe it will drive the increased investment needed into the development of safe, sustainable and affordable housing, to end our housing and homelessness crisis. Moreover, it is an invest-to-save model to be progressively realised over a number of years. The campaign's independent cost benefit analysis from Alama Economics found that incorporation of the right, and the supply of an adequate homes for everyone in Wales that would be associated with it, would generate £2.30 in benefits for every £1 spent, derived from savings to the NHS, reduced homelessness together with improved wellbeing for those households moving out of homelessness²⁶. It will also make housing a foundational mission of

²⁴ Tirion Homes. A new way / a new home / a new life. <https://www.tirionhomes.co.uk/>

²⁵ <https://www.tirionhomes.co.uk/our-homes>

²⁶ The right to adequate housing in Wales: cost-benefit analysis. <https://www.cih.org/media/ggbbh1df/cba-alma-economicsback-the-bill-final-phase-2-report-eng.pdf>



government and provide the paradigm shift which would mandate housing to be a key lens through which public policy, legislation and public investment is crafted and delivered in Wales.

The right will also ensure that this generation and future generations can access a safe suitable and affordable home as part of delivering an equitable Wales now and in the future.

Issues relating to planning

We have in this section not considered workforce issues relating to the planning process as we have covered this in detail in the section on developing the workforce. Rather we have in this section considered other issues impacting the planning process in Wales.

Tyfu Tai Cymru in its research report on housing need and desirability outlined that stigma against social housing is often expressed through the planning process which can hinder the speed at which a development can be started or even halt a development from happening completely²⁷. We have also heard from members that planning committees have asked for alterations to schemes following community opposition to developments meaning the development does not fully meet its objectives.

One example of this is where a town centre general needs scheme was only granted planning permission once the scheme was amended to 50 plus only. At a time when we are hearing of a significant shortage of one bed general need properties we need to look at ways we can minimise and remove the impact of stigma towards social housing impacts the current planning process.

²⁷ Housing need and desirability. Ensuring that the social homes we build don't just meet housing need, but are desirable to tenants and the wider community. <https://www.cih.org/media/542debxr/0512-ttc-report-housing-need-and-desirability-eng-v3.pdf>



There is a need to ensure that we involve our communities in our plans for developing homes. As recommended in our Tyfu Tai research communities should be involved in calculations of housing need so that the right homes are built in the right place. We also need to look at ways we can eradicate stigma around social housing both existing homes and planned new homes²⁸.

CIH Cymru sees the right to adequate housing as the key part of changing the narrative around social housing stigma in Wales, helping to promote the positive impact of diverse communities. The right to adequate housing is not just about a right, it is about a wholesale approach to housing, including using it as a building block for improving society. The right will address discrimination and ensure equality. This will include positive measures to ensure access to housing and eliminate housing discrimination.

If we are working towards everyone in Wales having a safe, suitable and affordable home then this can only build equity across housing tenures. The right is the key mechanism to delivering an equitable Wales for this and future generations.

Progress on developing the workforce

Our series of sector snapshots has consistently found that the housing workforce in Wales is facing significant pressures from rising workloads, reducing resources and a shrinking workforce. In 2025²⁹, two thirds of respondents stated that their mental health and wellbeing was being negatively impacted by these pressures.

The RTPI's latest state of the sector report also outlined that the planning sector is also overstretched impacting the sector's ability to meet Welsh government's ambitious policy ambitions³⁰.

²⁸ Housing need and desirability. Ensuring that the social homes we build don't just meet housing need, but are desirable to tenants and the wider community. <https://www.cih.org/media/542debxr/0512-ttc-report-housing-need-and-desirability-eng-v3.pdf>

²⁹ Sector Snapshot 2025: Survey of housing professionals in Wales. <https://www.cih.org/media/apsh1sir/cih-cymru-2025-sector-snapshot-english.pdf>

³⁰ State of the profession 2025: Wales. <https://www.rtpi.org.uk/media/3k0lnpx5/wales-sotp.pdf>



As outlined in our housing strategy³¹ for Wales the construction industry is seen as a ageing workforce. The numbers of individuals over the age of 60 now being the largest age group³². This is coupled with concern from the wider sector that as people retire skills will be lost and there are not enough people joining the industry to replace those that are retiring. The skills gap is also significant with research by CITB outlining that 12,000 additional workers are needed across the housing sector in Wales. An 11 per cent increase³³.

This is now the third consultation we have responded to where we have highlighted the need for an adequately resourced workforce as being key to implementing Welsh government's legislative or policy ambitions. One respondent to our 2025 sector snapshot summarised the impact on the sector:

"The whole housing system is over pressurised and substantial additional funding would be required to address the pressures listed. Forcing additional pressures on the system and on local authorities ultimately, through regulatory and imminent legislative change will only make matters worse³⁴. "

Our members work in housing to make a difference to individuals and the communities they work in, but they need to have the right level of resource to do this to prevent further negative impact on their mental health and ultimately burn out.

³¹ Housing strategy for Wales. <https://www.cih.org/media/udzfdit/0416-wales-housing-strategy-english-web.pdf>

³² Impact of the ageing population on the construction industry. https://www.ciob.org/sites/default/files/CIOB%20research%20-%20The%20Impact%20of%20the%20Ageing%20Population%20on%20the%20Construction%20Industry_0.pdf

³³ Net zero report Wales. https://www.citb.co.uk/media/bdrbdimo/b06414_net_zero_report_wales_v7.pdf

³⁴ Sector Snapshot 2025: Survey of housing professionals in Wales. <https://www.cih.org/media/apsh1sir/cih-cymru-2025-sector-snapshot-english.pdf>



Welsh government is in the very early stages of developing a housing strategy for Wales. A key part of this strategy must be how we ensure we develop a professional, resilient and competent workforce. One where we have the right sized workforce across the whole housing sector so we can work together with Welsh government to meet their ambitions for housing in Wales.

As one respondent to our 2024 sector snapshot said:

“Housing is not an after-thought. This should be one of the top priorities in Wales and in the UK. With the right housing available, the need for social and health services may be lessened. Its time housing is put front and centre³⁵.”

This must include a strategy for our whole housing workforce, for those who develop our homes to those who help people manage their tenancies and everyone in between. Our people are our best resource it is time we invest in them to help deliver the social homes we need to end Wales’ housing emergency.

Conclusion

There has been significant progress made in unblocking the barriers to developing the social homes we need in Wales. Yet despite this there is more that can be done. We see the key mechanism to developing the homes we need at pace and scale in the next Senedd term in order to end Wales’ housing emergency being enshrining the right to adequate housing into Welsh legislation. This will then act as the mechanism for Welsh government to not only have a whole system strategic approach to housing in Wales but will ensure that they commit the maximum level of resources to realising this right. The right will also help develop diverse communities and secure the right level of investment into

³⁵ 2024 Sector Snapshot: Survey of housing professionals in Wales. <https://www.cih.org/media/zqpb5xmw/cih-cymru-sector-snapshot-2024.pdf>

our housing workforce to ensure that they are valued, professional resilient and competent. The right is the paradigm shift needed for the housing system in Wales ensuring that this and future generations can access a safe, suitable and affordable home as part of our wider vision of an equitable Wales.



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Local Government and Housing Committee follow up inquiry: social housing supply

January 2026

Community Housing Cymru (CHC) is the voice of housing associations (HAs) in Wales. We represent 30 not-for-profit housing associations that provide almost 165,000 homes to 10% of the Welsh population. Our collective vision is to make Wales a country where good housing is a basic right for all.

We welcome the opportunity to provide evidence to the Local Government and Housing Committee's (LGHC) follow-up inquiry on social housing supply. This comes at a pivotal moment for the housing sector in Wales.

The urgency and scale of the housing emergency have been brought into sharp national focus in recent years through the publication of the LGHC, Affordable Housing Taskforce and Audit Wales recommendations. Most recently, the Taskforce's work culminated in a set of specific, practical, and urgent interventions. These interventions are widely viewed across the sector as a vital roadmap to move the focus to strategic, meaningful action and progress.

This response is designed to provide the Committee with an overview of the current landscape and our suggested areas of focus for action in the coming months and into the next Senedd term

1) Executive Summary

Housing associations remain fully committed to increasing delivery and have a strong pipeline of new homes beyond 2026. Delivery in the sector has accelerated significantly in recent years, culminating in a record-breaking 3,643 affordable homes completed in 2024-25.

However, progress is increasingly constrained by systemic barriers that limit the pace and scale of development. These include land availability and cost, planning system delays, infrastructure constraints, workforce shortages, rising build costs, and a lack of long-term funding certainty. In addition, unaligned policy objectives relating to housing quality standards and environmental regulations are actively undermining delivery of much needed additional social homes.



The Affordable Housing Taskforce and previous Committee inquiries have, combined, provided an outline roadmap for action. The challenge now is implementation. Moving from recommendation to delivery has proved complex, particularly where cross-sector coordination and statutory reform are required. Welsh Government must use its convening power to maintain momentum and prioritise practical delivery.

Our written evidence covers in further detail the barriers affecting supply and outlines the recommendations we urge the Welsh Government to prioritise:

- Scale up a national pipeline of public-sector land for social housing at discounted values
- Introduce a presumption in favour of development on Local Development Plan allocated sites
- Support the creation of a national development corporation with land assembly and compulsory purchase powers
- Provide multi-year certainty for the Social Housing Grant
- Reconsider rent convergence to unlock borrowing capacity and increase fairness between social housing tenants
- Remove barriers such as performance bonds and inconsistent mortgagee exclusion clauses
- Expand access to low-cost finance and review the impact of recent grant payment changes
- Enforce stronger statutory deadlines for Local Development Plans
- Drive consistency across Local Planning Authorities, including standardised agreements and approaches where possible
- Take a pragmatic approach to WHQS and WDQR, focusing on what is deliverable and matters most to tenants
- Urgently resolve marine nitrate and phosphate planning restrictions to unblock stalled affordable housing schemes
- Expand construction apprenticeships and work placements
- Scale up proven workforce initiatives across Wales

Without stronger alignment across housing supply, quality, infrastructure and environmental policy, delivery will continue to be constrained. Welsh Government leadership is now essential to ensure ambition is matched by deliverability and that social housing supply can be sustained and accelerated over the next decade.

To meet current and future housing needs, Community Housing Cymru is calling for a long-term plan for housing that focuses on more homes, better homes, and fairer and healthier places. This should include a 10-year roadmap to deliver an additional 60,000 affordable homes by 2036, ensuring 20% of all homes in Wales are affordable homes.

This ambitious target must be supported by new delivery mechanisms, including the creation of a national development corporation, effective collaboration to unlock bottlenecks, and government support for apprenticeships to grow the workforce.



2) Work underway to meet the current 20,000 target and to ensure a pipeline post-2026:

Significant work is underway across the housing sector to meet the current target of 20,000 low-carbon social homes and to ensure a strong delivery pipeline beyond 2026. While delivery is projected to fall slightly short of the March 2026 deadline, the target of 20,000 will be met shortly thereafter.

The pace of delivery has accelerated significantly in the last year. The 2024-25 financial year is marked as a record-breaking period for affordable housing in Wales. A total of 3,643 affordable homes were completed, representing a 12% increase from the previous year. This figure is the highest annual total achieved since affordable housing records began in 2007 and demonstrates the impact of constructive collaboration between the Welsh Government, housing associations, local authorities and delivery partners. Welsh housing associations continue to make the largest contribution to additional affordable housing in Wales, delivering 74% of all new affordable homes.

Accelerated progress has been achieved despite a series of significant external challenges, including the COVID-19 pandemic, global supply chain disruption, rising construction costs and labour shortages. However the delivery of affordable homes has increased by 79% since the start of the current Senedd term, underlining the sector's resilience and a shared commitment to meeting housing need.

This momentum has been supported by the Welsh Government's record £2 billion investment in social housing over the current Senedd term. A pragmatic and flexible approach to delivery has also been key, with the creation of the Transitional Accommodation Capital Programme (TACP) to combine new-build development with the acquisition and conversion of existing homes.

Looking ahead, the focus must now be on ensuring a robust and sustainable pipeline of social homes well beyond the current target period. This will require continued action to address long-standing systemic challenges in the housing system, implementing the detailed recommendations already in place, and creating new delivery mechanisms to achieve the pace and scale needed.

Ongoing infrastructure challenges are also increasingly hindering development of much needed homes. Dŵr Cymru's Asset Management Programme (AMP) is causing significant issues, stalling viable schemes due to insufficient water/wastewater capacity and escalating treatment costs. Simultaneously, the shift to electric-only homes strains limited electrical grid capacity, with long upgrade times further restricting delivery. Collectively, these infrastructure limitations are a critical barrier to meeting housing need.

While the draft Welsh Government budget includes £446 million for the Social Housing Grant (an uplift of around £9 million), ongoing cost pressures mean that this alone is unlikely to fully support the level of ambition required. A long-term, multi-year approach to capital investment is critical to provide certainty for housing associations, enabling strategic land acquisition, long-term



planning, and stronger lender confidence. Without funding certainty delivery at scale is constrained.

Progress towards implementing the recommendations of the Affordable Housing Taskforce:

The final report of the Affordable Housing Taskforce, published in May 2025, proposes 41 recommendations to streamline delivery. The Welsh Government has accepted all of the Affordable Housing Taskforce's recommendations, and established an implementation group of sector representatives, including Community Housing Cymru.

The taskforce have rightly identified that a collaborative approach is needed to make progress across the recommendations. Lead partners, such as CHC and WLGA, have taken ownership of some actions to progress specific recommendations, for example CHC and our members have supported the taskforce with pursuing action on loft conversion opportunities and overcoming barriers to SuDs requirements. Housing associations have also participated in regional meetings with the Cabinet Secretary, which have been useful forums for discussing live issues and sharing good practice.

Given the deeply systemic nature of the issues identified, the Welsh Government's intervention and convening power is required to drive change. We recognise that the issues highlighted in the recommendations, particularly concerning Planning and the consultation of statutory consultees, are complex to overcome. Achieving the necessary Wales-wide buy-in and collaboration across Local Planning Authorities is challenging in practice and consequently, progress on many recommendations will take time. Although we are pleased that a range of short, medium, and long-term priorities have been identified and progress is being made, it is still too early to see these efforts translate into tangible outcomes on the ground.

The extent to which work to increase supply is being undermined by other policy goals:

The Welsh Government has acknowledged the social and economic value of social housing supply by making it a top five priority. This welcome commitment signals a high level of political importance attached to meeting the current housing targets and planning for the post-2026 pipeline.

However, the effort to increase social housing supply faces significant challenges from competing policy goals.

Housing quality and design requirements

The launch of the updated Welsh Housing Quality Standard (WHQS) last year lacked details on costs, impacts, and funding. The comprehensive cost of WHQS is prohibitively expensive, we do not have a realistic route to delivery, and not all requirements mandated by the standard are



those of paramount importance to tenants.

For instance, the Energy Performance Certificate (EPC) "A" target for all homes is not achievable within current resources. Research indicates that housing associations would be required to invest £130,000 per property up to 2050 to satisfy the EPC 'A' requirement, in addition to other WHQS stipulations. This is unaffordable, and 2 years on from the introduction of the policy we still do not have a route to delivery. A lack of funding certainty, a significant skills gap and a limited Welsh supply chain all further hamper the progress made to date.

Furthermore, social landlords will be obligated to comply with new WHQS requirements concerning hazard response from April 2026. This necessitates training, modifications to systems, and procedural changes, with an implementation lead time of only three months.

Our members are also finding that meeting the Welsh Development Quality Requirement (WDQR) to build all new homes to EPC A standard is becoming particularly difficult for high-density flat schemes. These are increasingly challenging to build to the required EPC A standard and to achieve viability within the current grant thresholds. Flat schemes offer much needed accommodation for small families and single persons, of which there is huge demand. According to [Shelter Cymru](#), over half of households waiting for a social home are seeking a one-bedroom property.

The sector requires support from the Welsh Government to achieve the ambitions set out in WHQS and WDQR. It's time to prioritise: we need to focus on what matters most to tenants, and adopt a pragmatic approach, whilst doing as much as we can to improve and decarbonise homes.

We need a clear, joined up plan for housing that recognises the impact that significant investment in retrofit will have on business plans, especially investment in new homes. We're calling on the next Welsh Government to revise standards for existing homes, focusing on and prioritising what is deliverable and most important to tenants: affordable, warm, safe and well-maintained homes. We must also ensure that grant levels are sufficient to enable housing associations to achieve DQR standards, particularly for challenging build types, such as flats.

Environmental policy

Natural Resources Wales' (NRW) July 2025 planning advice led to an immediate halt on all housing planning applications and the discharge of drainage conditions in affected areas across South West Wales due to marine nitrate pollution.

The guidance requires new housing developments in nutrient sensitive areas including Pembrokeshire, Carmarthen Bay, and Cemlyn Bay to achieve "nutrient neutrality" by proving they will not increase nitrogen levels in marine Special Areas of Conservation. NRW data confirms that agriculture is the primary contributor to marine nitrate pollution through fertilizer and waste. Despite this, the housing sector (a marginal contributor) is bearing the brunt of the planning restrictions.



The resulting impact on development is immediate and stark, effectively freezing the construction of much-needed affordable homes during a national housing crisis. In West Wales and surrounding areas, over 2000 affordable homes are currently stuck in the planning process, with hundreds more hanging in the balance. In addition, NRW advice in relation to phosphates still remains a blocker to new home delivery, particularly in Wrexham. This stalemate has shifted the issue from a purely environmental concern to a social justice crisis, as rural communities struggle with rising waiting lists and a lack of local housing options while long-term agricultural solutions remain years away.

We welcome the Welsh Government's rapid establishment of the Marine Nitrate Taskforce to explore opportunities for progressing stalled developments, however progress has been slow and we are yet to see any solution in place to allow sites to continue to be developed and occupied. Welsh Government must continue to prioritise this work as a matter of urgency, and ensure that all stakeholders and developers are working collaboratively to explore options and are kept informed of progress. A strategic solution and long-term support for developers must be key outcomes of this work to restore confidence across the development sector and supply chain.

We understand the Taskforce is considering options to exempt certain housing developments from the planning advice and this is our preferred approach to allow sites to continue quickly. If an exemption is not feasible, we urge the Welsh Government and statutory partners to support the sector with exploring short-term alternatives mitigations, such as temporary Package Treatment Plants (PTPs), until a longer-term pan-Wales strategic solution is achieved. The Welsh Government's proposed Nutrient Trading Group is welcome, however this is likely to be a longer-term solution due to timescales associated with establishing such a mechanism.

We are also concerned about NRW's upcoming testing over the next 18–24 months. To avoid a repeat of the abrupt planning changes that halted development in 2021 (phosphates) and 2025 (marine nitrates), a clear transparent strategy and workable nutrient-mitigation solutions must be in place before any new further marine SAC data is released. We strongly recommend an early-warning system to flag emerging issues to social landlords and developers at the earliest stage. Social landlords and developers should also be forewarned of all testing activity. Without this, social landlords are unable to accurately determine the suitability and viability of future sites.

At the heart of these challenges is a lack of alignment across Welsh Government policy priorities, with housing supply, quality and environmental ambitions being progressed in isolation rather than as part of a coherent delivery strategy. Ambitious standards and environmental protections are being introduced without sufficient assessment of their cumulative cost, capacity and delivery impacts, resulting in unintended but significant constraints on the supply of new social housing.

How the Welsh Government is developing its strategic role in relation to land

A fundamental challenge impeding the delivery of social housing in Wales is the scarcity and cost



of suitable land. Land is a finite resource and it represents the single largest variable cost in any development scheme.

The Welsh Government's strategic engagement with land is paramount to overcoming this barrier. A key focus must be on leveraging the land holdings currently under public sector ownership to bring forward specifically for the purpose of developing affordable housing. We strongly endorse the recommendation that public sector land designated for social housing should be made available at a significant discount. This measure would directly address the viability gap that high land costs often create for social housing developments.

Furthermore, we support the recommendation that land already identified as suitable for housing within a Local Development Plan (LDP) should operate under a presumption towards development, which would necessitate primary legislation. This would eliminate the current practice of re-debating the principle of residential development during the planning application stage, thereby streamlining the process and reducing delays.

The Welsh Government has initiated work to tackle the problem of stalled, vacant, and derelict land, particularly sites already within public ownership, and is actively identifying development opportunities. As a priority action, this must be scaled up to create a robust, visible pipeline of suitable land.

The creation of an arms-length body or similar specialist entity could be instrumental to support this. Such a body could combine resources and expertise across the public sector, providing a powerful mechanism for land management. Community Housing Cymru supports the creation of a national development corporation, a semi-commercial entity with the authority and financial resilience to deliver large-scale, strategic sites. This body would be tasked with leading regeneration, coordinating major urban extensions and new towns over longer timeframes, and possessing the power for compulsory purchase. Its core functions would include: land assembly (using CPOs strategically), remediation for complex sites, and coordinating public sector land.

We urge the Welsh Government to prioritise:

- **Scaling up land pipeline:** The Welsh Government's work to tackle stalled, vacant, and derelict land (particularly public sector sites) must be scaled up to create a robust, visible pipeline of suitable land which could be offered at a significant discount to social landlords.
- **Presumption towards development:** Implement a long-term change to planning policy so that land already identified as suitable for housing within a LDP operates under a presumption towards development, eliminating re-debating the principle of residential development during the planning application stage.
- **Create a National Development Corporation:** Support the creation of a national development corporation, a semi-commercial entity with the authority, financial resilience, and compulsory purchase powers to lead regeneration, land assembly, and coordination of major strategic sites over long timeframes.



The availability of finance:

Housing associations have the ability to secure and utilise private finance alongside grant subsidy to increase the supply of affordable housing. This allows them to magnify the impact of public investment. 40% of housing associations total spend comes from government grants. The remaining 60% is financed through private borrowing and other income streams (like rent), demonstrating their unique ability to deliver and demonstrating how government investment acts as a vital catalyst for private finance. Housing Associations are demonstrating their commitment to scale and their private borrowing is anticipated to reach £5.4 Billion by 2027.

The volume of new social homes delivered in Wales is closely linked to housing associations' financial capacity, as the vast majority of schemes rely on a combination of Welsh Government grant and private borrowing. In recent years, however, the external financial environment has become significantly more challenging. Rising UK interest rates since 2022 increased the cost of private borrowing, making development finance more expensive and, in some cases, undermining scheme viability. At the same time, high inflation and wider operating cost pressures has constrained borrowing headroom, as lenders assess affordability based on future income and financial resilience. Although private finance remains available, it is generally less cheap and flexible than the low-interest-rate environment of the previous decade.

Build costs have also risen sharply, meaning that the same grant levels now support fewer homes. In recent years there has been an estimated 75% increase in the grant required per general-needs social rented home, rising from around £93,000 in 2020/21 to £181,863 in 2024/25. Unless grant allocations continue to rise in line with inflation, delivery will inevitably fall.

To counteract the constraint on supply caused by the cost and availability of private finance, the Welsh Government has introduced low-interest loan schemes to help maintain development momentum, including the Land for Housing scheme. These are welcome and represent a clear recognition that private finance alone has not been sufficiently affordable to sustain the levels of social housing delivery required.

We welcome the Welsh Government's recently announced 10-year rent and service charge standard (2026–2036), which provides greater certainty and stability for both social landlords and tenants. This long-term clarity will strengthen business planning, improve lender confidence, and enhance housing associations' capacity to borrow and build.

However, we are urging Welsh Government to reconsider the current policy on rent convergence. Rent convergence allows social landlords to achieve greater fairness among tenants by bringing rents closer to a consistent formula level, which would be more equitable than a general, higher rent increase. It can also unlock further investment in new and existing social and affordable housing by generating additional rental income for social landlords. This increased financial



capacity helps landlords maintain the quality of existing homes and enables them to borrow and invest in new developments.

Further action is needed to address ongoing financial constraints and maintain momentum to development pipelines. A number of additional interventions, already recognised by the Affordable Housing Taskforce, could significantly improve scheme viability and borrowing capacity.

Performance bonds

The existing requirement for developers to provide sureties and Performance Bonds acts as a significant administrative and financial barrier, disproportionately affecting Small and Medium-sized Enterprises (SMEs) that are crucial for diversifying and increasing the pace of housebuilding.

The Taskforce recommended the removal of surety requirements for schemes where a housing association is the lead developer, recognising the stability and long-term commitment of housing associations. Further work is required to address the market failure associated with performance bonds, in order to establish a system that provides appropriate security without unnecessarily restricting development.

Mortgagee Exclusion Clause (MEC)

The absence of a standardised form of the Mortgagee Exclusion Clause (MEC) across funding agreements introduces unnecessary complexity, leading to protracted negotiations and constraining housing associations' borrowing capacity. Adopting a consistent, sector-wide approach to MECs is estimated to unlock between £166 million and £333 million in additional borrowing capacity, with the potential to support the delivery of approximately 2,000 to 4,000 new social rented homes. This represents a high-impact, low-cost intervention to accelerate supply.

Development Bank of Wales

The Development Bank of Wales has an important role to play in supporting social housing delivery and could significantly expand its engagement with the sector. This is particularly important in improving access to finance and expertise for SMEs, which often struggle to secure traditional commercial lending despite their ability to deliver high-quality housing schemes.

Finally, to support effective planning and maintain a strong development pipeline, greater certainty over future funding is essential. The provision of multi-year settlements for the Social Housing Grant (SHG) is critical. Moving away from annual funding cycles would provide housing associations with the certainty needed to borrow with confidence, acquire land, manage risk, and plan complex, multi-phase developments over the long term.

A significant and more recent challenge is the work that Welsh Government has undertaken to reform SHG arrangements following changes to accounting requirements. The move away from advance grant payments to a 40/40/20 payment profile has required significant changes to cash-flow management and payment processes, leading to delays in grant payments and placing



additional pressure on development financing. This change has shifted a greater proportion of cost and risk onto housing associations at the most capital-intensive stages of development.

While we recognise the accounting drivers behind the change, the current payment profile is not neutral in its impact; it is causing significant problems with bringing future schemes through. These impacts must be carefully reviewed to ensure that the change does not constrain delivery or increase reliance on more expensive short-term borrowing.

We urge the Welsh Government to prioritise:

- **Rent convergence policy:** Reconsider the current policy on rent convergence to unlock further investment in new and existing social housing by generating additional rental income.
- **Performance bonds:** Addressing the market failure associated with performance bonds to establish a system that provides appropriate security without unnecessarily restricting development
- **Mortgage exclusion clauses:** Adopting a sector-wide approach to the MEC across funding agreements to unlock an estimated £166 million to £333 million in additional borrowing capacity.
- **Multi-year certainty:** Providing multi-year settlements for SHG to give housing associations the certainty needed to plan long-term, complex developments
- **Low cost finance** Exploring alternative funding mechanisms to facilitate delivery through low cost borrowing
- **Monitoring the impact of grant payment changes:** Ensure that grant payment changes do not constrain delivery or increase reliance on more expensive short-term borrowing.

Issues relating to planning

The planning system in Wales is widely characterised as overloaded, inconsistent and lacking sufficient specialist expertise. This complexity drives higher costs, creates uncertainty, and contributes to significant delays in bringing forward new social housing developments.

The LDP system in Wales is under strain, with 11 of the 25 LDPs now expired or not in place. This lack of up-to-date plans creates uncertainty for applicants and makes it harder to identify suitable development land, particularly where existing allocations are no longer viable or deliverable. As a result, there is intense competition for a limited supply of available land, driving up costs and constraining delivery. While we support a plan-led system for the certainty it provides when making long-term investment decisions, the current situation is reducing the number of new homes coming forward. Stronger statutory deadlines are needed to accelerate the preparation and adoption of LDPs.

There is also a clear need for reform to improve efficiency and consistency across Local Planning Authorities (LPAs). As recognised by the Affordable Housing Taskforce, greater standardisation,



particularly in relation to Section 278 and Section 38 agreements (highways infrastructure) and Section 106 obligations (planning obligations), would significantly reduce negotiation times and administrative burden for both applicants and LPAs. Delays caused by statutory consultees also remain a major barrier to timely decision-making. LPAs should be better empowered to take a managed-risk approach to determining applications where statutory consultees fail to respond within prescribed timescales, rather than development being stalled indefinitely.

The Sustainable Drainage Systems Approval Body (SAB) process remains a significant source of delay for housing delivery. Requirements for full technical SAB approval prior to the grant of planning permission unnecessarily prolongs pre-commencement stages, and we therefore welcome recommendations that SAB applications should run alongside planning applications, with conditions discharged concurrently.

More widely, delays reflect under-resourcing, inconsistent processes across authorities, and a shortage of specialist legal and technical expertise. These pressures often result in prolonged negotiation of agreements, repeated redrafting where legal services are outsourced, and increased uncertainty for developers. The use of template agreements to standardise agreements, alongside a review of requirements such as ministerial sign-off of legal charges, would help reduce complexity and improve consistency. We understand that the Welsh Government is currently exploring these options.

Decision-making times in the planning system could be significantly improved through greater use of delegated powers by increasing the threshold for what constitutes a “major” development. The Welsh Government has recently confirmed its intention to raise this threshold to 25 dwellings in the [summary of responses](#) to the permitted development rights consultation held earlier this year. CHC strongly supports the principle of increasing the major development threshold and recognises the benefits this approach may deliver in reducing delays and unlocking stalled sites. However, consistent with the Affordable Housing Taskforce recommendations, CHC considers that the proposed increase to 25 dwellings does not go far enough; and that 50 dwellings, alongside a corresponding increase in site area from 0.5 hectares to 1 hectare, would reduce committee backlogs, improve proportionality, and accelerate housing delivery.

This consultation also explored the potential for introducing permitted development rights for affordable housing meanwhile use sites, a measure CHC fully supported in our response. The Welsh Government identified that further investigation is required due to divergent views on this proposal. We strongly urge the Welsh Government to explore this with urgency as it holds the potential to significantly expedite the planning process for developments that can be rapidly constructed.

Underlying many of these issues is a persistent shortage of skills across the built environment professions, including planning, statutory consultees and construction. Budgetary pressures on local authorities, combined with the retirement or departure of experienced professionals, have



resulted in widespread capacity constraints across Wales. Delays in planning and consenting are now having a direct impact on the speed at which new homes can be delivered, while a lack of coordination between different regulatory functions further exacerbates the problem.

Many of our members report waiting over a year for SAB approval even after planning consent has been granted. These delays affect not only delivery times but also the ability to draw down Welsh Government grant funding at the appropriate point in the development process. The cumulative impact on scheme viability and cash flow can be significant, with knock-on effects for contractors. Uncertainty in development pipelines is a key contributor to financial instability in the construction sector and has, in some cases, led to insolvency, creating a vicious cycle that further limits development capacity in Wales.

Welsh Government has an important role to play in reversing these trends through strategic policy direction and targeted, long-term investment. It can act as a national convenor to support coordinated workforce development, upskilling both new entrants and existing staff in response to changing regulatory and technical requirements. There is also a need to ensure that effective improvement and advisory services are available to LPAs. Siloed working within local authorities remains a significant challenge, particularly for complex schemes, and is often a symptom of wider resourcing pressures.

Welsh Government has recently announced that planning application fees will increase to more cost-reflective levels, with the changes coming into force from December 2025. These reforms are intended to address the long-standing gap between the cost of determining planning applications and the income received by LPAs, moving fees closer to full cost recovery. However, despite strong calls from the housing sector and professional bodies, the additional fee income will not be ring-fenced to increase planning capacity or specialist expertise. Instead, Welsh Government intends to introduce a revised monitoring framework to track planning performance and delays.

While improved monitoring is welcome, performance frameworks alone will not resolve the structural capacity issues facing the planning system. Without a mechanism to ensure that additional income is reinvested in staffing, skills and specialist resources within LPAs, there is a significant risk that the intended benefits of cost-reflective fees will not be realised, limiting their impact on system-wide improvement. The planning fees increase will also not address the underresourcing experienced in other LA departments, including for example highways where consent is required.

We urge the Welsh Government to prioritise:

- **Implementing existing recommendations:** Many of these barriers require coordinated action and collaboration of stakeholders. Welsh Government should utilise its convening power to bring together key LPAs, statutory consultees and developers to drive forward recommendations in relation to streamlining and achieving consistency in the planning system



- **Making the plan-led system work:** Introducing and enforcing stronger statutory deadlines to ensure LDPs are adopted much faster.

Progress on developing the workforce

A shortage of skills across the built environment professions, including planning and construction, continues to undermine practical improvements in the system. A pipeline of experienced and skilled officers to support delivery of affordable housing is critical. Housing associations are actively working to address this by introducing new staff to the sector, providing essential construction, planning, and development skills, and promoting career opportunities to stimulate house building.

CHC has supported CIH Cymru in exploring the feasibility and function of a social housing development academy in Wales, which is currently seeking funding to move forward. The sector is already implementing initiatives to develop talent, such as Adra's in-house 'Trwsio' team, which facilitates improved workforce planning. There are numerous examples of good practice across the sector that could be successfully scaled or adopted more widely, including the shared apprenticeship programme in southwest Wales, and the Tŷ Gwyrddfai decarbonisation hub.

We strongly endorse the recommendation to reintroduce the Level 2 Apprenticeship in Construction to help young adults enter the industry. We understand that the curriculum is evolving to meet economic needs, with a significant push toward Level 2 construction apprenticeships, however there are currently not enough placements being created despite the demand being high.

Currently, housing associations directly and indirectly sustain over 37,000 jobs in the Welsh economy, demonstrating a significant reach into supply chains across Wales. This has the potential for substantial expansion, offering benefits for the Welsh Economy that would exceed their current £1.4bn contribution.

We are calling on the next Welsh Government to support a new generation of builders and tradespeople creating over 2000 apprenticeships and 1,245 work placements. For every 20,000 new housing association homes, 6,290 new direct jobs and 7,910 indirect jobs throughout the supply chain would be created per year.

Welsh Government should prioritise:

- **Supporting apprenticeships:** We need a new generation of builders and tradespeople. CHC is calling on the next Welsh Government to create over 2,000 apprenticeships and 1,245 work placements.
- **Supporting a workforce development academy:** The feasibility of a social housing development academy has been scoped and is awaiting funding to be taken forward.
- **Scaling up existing examples of good practice:** such as shared apprenticeship programmes



and decarbonisation hubs, to develop talent and improve workforce planning.

Hayley Eastment
Policy Lead, Community Housing Cymru



Llywodraeth Cymru
Welsh Government

Ein cyf/Our ref JB/PO/5/26

John Griffiths MS
Chair
Local Government and Housing Committee
Senedd Cymru

SeneddHousing@senedd.wales

9 January 2026

Dear John

Inter-Institutional Relations Agreement: Inter-ministerial Group (IMG) for Housing, Communities and Local Government

In accordance with the inter-institutional relations agreement, I would like to inform you that a meeting of the IMG for Housing, Communities and Local Government will take place on 4 February 2026.

The in-person meeting will be hosted in Northern Ireland by the Northern Ireland Executive. The meeting agenda will focus on topics relating to the development and delivery of housing strategies.

An update will be provided after the meeting.

I hope this information helps.

Yours sincerely,

Jayne Bryant AS/MS

Ysgrifennydd y Cabinet dros Lywodraeth Leol a Thai
Cabinet Secretary for Housing and Local Government

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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.

Mike Hedges MS
Chair
Legislation, Justice and Constitution Committee
Senedd Cymru

SeneddLJC@senedd.wales

14 January 2026

Dear Mike,

Inter-Institutional Relations Agreement: Celtic Heritage Agreement Annual Report

In accordance with the inter-institutional relations agreement, I am writing to notify you that the Celtic Heritage – Cornwall-Wales Collaboration Agreement: Annual Report 2025 has been published on Cornwall Council's website and is available [here](#).

Cornwall Council and the Welsh Government signed the Celtic Heritage – Cornwall-Wales Collaboration Agreement on 17 July 2023. The Agreement, which runs for an initial five-year period, builds on existing partnership working between Cornwall Council and the Welsh Government by encouraging further cooperation and understanding in areas of mutual interest and for mutual benefit. Four areas were identified as providing significant opportunity to grow the relationship between Cornwall and Wales. These were:

- a) Sustainable housing provision.
- b) Achieving Net Zero.
- c) Thriving rural economies.
- d) Celebrating culture and language.

I have also copied this letter to the chairs of the following Committees: Climate Change, Environment, and Infrastructure Committee; Culture, Communications, Welsh Language, Sport, and International Relations Committee; Local Government and Housing Committee; and Economy, Trade, and Rural Affairs Committee.



Eluned Morgan

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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.

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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.



Local Government and Housing Committee's Social Housing Follow Up Inquiry

Crisis Response

January 2026

About Us

Crisis is the national homelessness charity. We know that homelessness is not inevitable, and we know that together, we can end it.

We directly support people who are facing homelessness through our Skylight services, research the causes and campaign for the actions needed to end homelessness.

Response

Please note: Crisis' response is short and limited to particular questions. If Committee members have any further queries or requests for further information, we would be happy to assist.

Firstly, Crisis would like to take this opportunity to emphasise that increasing Social Housing Supply is fundamental to ending homelessness in Wales. As the committee is well aware, in recent years homelessness in Wales has been exceptionally high, with councils across Wales recording that they were supporting nearly 13,300 people who were experiencing homelessness last year.¹

As outlined within the National Action Plan to End Homelessness,² the rapid rehousing, or housing led approach is essential to ending homelessness. This is an internationally recognised approach that acknowledges the importance of ensuring that people who are experiencing homelessness are moved into a stable home as swiftly as possible. Without a stable home, it becomes very difficult to rebuild lives – people face many barriers and often develop further support needs. But in order to ensure we can move people into stable homes as swiftly as possible, we need to ensure that we are creating homes that align with the needs of people experiencing homelessness.

In addition, research by Crisis and Heriot- Watt University demonstrates that, in order to turn the tide on high levels of homelessness, we must do more to prevent homelessness

¹ [Homelessness: April 2024 to March 2025 | GOV.WALES](#)

² https://www.gov.wales/sites/default/files/publications/2021-11/ending-homelessness-high-level-action-plan-2021-2026_0.pdf

and support people who are facing homelessness, and crucially – increase our housing supply – particularly those for social rent.³

Crisis has welcomed the anticipated Homelessness and Social Housing Allocations Bill and believes that this will establish a key framework for improving homelessness prevention and support. However, it is clear that without also simultaneously boosting our supply of affordable housing – particularly homes for social rent - the effectiveness of the Bill will be limited.

As such, Crisis welcomes this inquiry. We would particularly emphasise the need for future targets on social homes to be informed by data analysis on the needs of people experiencing homelessness. It is critical that we look not only at the numbers of homes needed, but the types of homes required to match demand. Within the current context of high levels of homelessness and local authorities footing bills of £99million⁴ for extensive stays in (often unsuitable) temporary accommodation, it is imperative to include such a focus on homelessness.

Work underway to meet the current 20,000 target and to ensure a pipeline post-2026

As members of the Ending Homelessness National Advisory Board, we welcome the efforts made to increase the numbers of affordable homes over this Senedd term – and recognise that there have been a number of barriers in pressing ahead with these targets. Indeed, we understand that barriers such as the rising cost of construction and phosphate levels continue to present difficulties in developing affordable homes.

While the Welsh Government has neared the target, statistics published in November reveal that the target will not be met by the end of the parliamentary term, with 18,652 homes estimated to have been delivered⁵.

While of course we welcome the investment towards this target in this term, it must be acknowledged that, since the 20,000 target was set, levels of homelessness in Wales have significantly risen. In fact research shows that as of 2022, homelessness was rising faster in Wales than elsewhere in Great Britain.⁶

It is clear that the next Welsh Government will need to seek refreshed commitments and targets on increasing our stock of affordable housing supply. In setting refreshed targets, it will be critical to:

- Ensure new targets reflect the up to date and increased need across Wales, including the needs of those experiencing homelessness.

³ [the-homelessness-monitor-wales-2025.pdf](#)

⁴ [The-Cost-of-Crisis-Report-2024-1.pdf](#)

⁵ <https://www.gov.wales/written-statement-affordable-housing-provision>

⁶ [the-homelessness-monitor-wales-2025.pdf](#)

- Ensure that targets extend beyond the numerical, in particular supporting Local authorities to create local targets that reflect the *types* of homes needed to meet demand, with a particular view on meeting the needs of those facing homelessness and living for long periods in temporary accommodation.
- Provide further increases in funding for social housing, and ensure that there is security in funding levels for future years so that housing associations have the security to invest.
- Includes a clear focus and target for creating homes specifically for social rent, which is a limited and much needed resource. The current target has encompassed the broader spectrum of affordable homes, for example homes for intermediate rent and shared ownership. Given the levels of homelessness, it is essential that we include distinct targets that focus on the development of properties that are affordable for those on the lowest incomes.
- Provide continuous means for monitoring progress, as well as public transparency on work towards meeting targets.
- Assess and address continued barriers to meeting targets, such as construction issues and phosphate levels.

Progress towards implementing the recommendations of Affordable Housing Taskforce

Recommendation 32 of the Affordable Housing Taskforce report⁷ emphasises the need to make progress on developing Local Housing Market Assessments (LHMAs) and Rapid Rehousing Transition Plans. These documents form a critical role in assessing and planning for future housing supply, seeking to ensure that housing supply and the types of homes developed are matching need.

Rapid Rehousing Transition Plans, in particular, are intended to help local authorities strategically plan to move towards the internationally recognised housing-led approach to homelessness. This approach acknowledges that a stable home is essential in helping people to rebuild their lives and that experiencing homelessness over prolonged periods can be traumatic and lead to the development of complex needs. It calls for the careful development of housing supply which aligns with the needs of people experiencing homelessness, so that people without a place to call home can be swiftly rehoused. It seeks to move away from our high reliance and the long stays people are currently experiencing in temporary accommodation.

We understand that all local authorities have now published a Rapid Rehousing Transition Plan and have also undergone the first tranche of the new approach to the LHMA. It will be essential that work is done to look at the effectiveness of these tools across Local authorities and to support further improvements in future iterations. Indeed, our

⁷ [Affordable Housing Taskforce: report and recommendations \[HTML\] | GOV.WALES](#)

understanding is that the content of Rapid Rehousing Transition Plans can vary across areas. While there is good practice across local authorities, developing these plans is complex and requires careful data analysis and the development of innovative solutions. It is essential that authorities are supported to continue to develop, evolve and improve these plans.

In addition, recommendation 33 highlighted the work ongoing by the Ending Homelessness National Advisory Board's Rapid Rehousing Task and Finish Group to consider how alignment between the needs of people experiencing homelessness and the development of housing supply can be improved. This group conducted a deep dive exercise across three local authorities to identify good practice that can be shared elsewhere as well as gaps in systems which hinder the alignment of housing supply with local data on homelessness.

The report from this work is currently being finalised, but includes a range of learnings and recommendations which it will be important for the next Welsh Government, as well as for key partners across the sector to take on board so that we can improve the alignment of housing supply with the needs of people experiencing homelessness in the future. For example, findings within this include but are not limited to:

- The need to take a wide-lens view on the planning of housing supply, looking across a range of options in order to meet need, including building new homes, repurposing and renovating empty spaces.
- The importance of leadership and strategic oversight to ensure the range of strategies looking at housing supply broadly interconnect and include a focus on meeting homelessness need.
- The need to support the further development and improvement of data collation and analysis on the housing needs of people experiencing homelessness, as well as to support accurate projections of future need.
- The need to establish a working group to support local authorities in addressing the complexities of meeting the acute demand for one-bedroom properties. Such a working group should include key partners such as local authorities, RSLs and relevant third sector organisations. It should consider both practical solutions to meeting current demand, while also carefully considering how to project the future need for such properties and incorporate these projections into plans to meet existing demand.
- The need to support and develop collaborative ways of working across key partners to collate and share accurate information on the needs of people facing homelessness and to plan for those needs.
- The findings within this report also echo key points raised by the Taskforce, including the need for strong partnerships between local authorities and Housing Associations to collaborate and plan supply and the importance of developing leadership in this space.

As recommended by the Taskforce, it will be essential that the Welsh Government takes heed of and builds upon the learnings within this report. The next Welsh Government must seek to support local authorities and key partners in improving practices to ensure that accurate information and projections on homelessness is informing the planning of housing supply.

Other points

In addition to looking at increasing the supply of social homes in line with need, it is also important to consider other factors which contribute to the availability and accessibility of affordable social homes.

Research demonstrates that social housing allocations to homeless households can vary significantly across areas.⁸ The new powers around social housing allocation within the anticipated Homelessness and Social Housing Allocations Wales Bill seek to help address this inconsistency. However, it will also be important to consider how local allocations policies are operating and any barriers that they may present for people who are experiencing homelessness.

In addition, as highlighted within Crisis' recent response to the Welsh Government's consultation on a new rent and service charge standard for social landlords in Wales,⁹ we know that many people are already finding social rent unaffordable, with 46% of social tenants in arrears across Wales.¹⁰ While we understand the rationale for the retention of the rent envelope at CPI +1%, this can ultimately result in a continued divergence from affordability and income. We urge that the next Welsh Government review the use of CPI as a basis for setting rent in the future and its impact on social housing affordability - including its impact across different regions of Wales. We believe there may be a more appropriate way of linking rent to income, ensuring that rent increases are more closely aligned to income indicators such as wage growth and benefit levels. It is important that social housing remains affordable to those in the lowest quartile of local incomes.

We also know that service charges can vary and often present difficulties in affordability for tenants. While we understand efforts are being made to strengthen existing guidance on service charges, we would urge that more work is needed to monitor and review service charges across Wales -with the intervention, where necessary, to ensure service charges are affordable.

Further information

If you have any queries on the points raised within this response, please do not hesitate to contact us at Campaigns.Wales@crisis.org.uk.

⁸ [ending-homelessness-in-wales-a-legislative-review.pdf](#)

⁹ [A new rent and service charge standard for Wales \[HTML\] | GOV.WALES](#)

¹⁰ <https://www.gov.wales/social-housing-vacancies-lettings-and-arrears-april-2023-march-2024-html>

Document is Restricted



Llywodraeth Cymru
Welsh Government

Our Ref: JB/2722/25

John Griffiths MS
Chair Local Government and Housing Committee
Senedd Cymru
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CF99 1SN

19 December 2025

Dear John,

I am grateful to the Local Government and Housing Committee for its consideration of the Building Safety (Wales) Bill and the Committee's recommendation that the Senedd agrees to the general principles of the Bill. I also note the concerns raised in evidence provided to the Committee during Stage 1 and look forward to working in partnership to address them.

I have set out my responses in the table below and am pleased to note that I have accepted the majority of your recommendations.

I trust this response will help to inform further scrutiny of the Bill and I look forward to continuing to work with Committee Members as we proceed through the Senedd's legislative process.

I am copying this letter to the Chair of the Finance Committee and Chair of the Legislation, Justice and Constitution Committee.

Yours sincerely

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Ysgrifennydd y Cabinet dros Lywodraeth Leol a Thai
Cabinet Secretary for Housing and Local Government

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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.

Recommendation	Government Response	Comments
<p>Recommendation 1: We recommend that the Senedd agrees to the general principles of the Building Safety (Wales) Bill but notes that significant concerns were raised in evidence provided to the Committee in respect of various aspects of the Bill, which the Welsh Government should address urgently.</p>	Noted	<p>I am grateful to the Committee for its consideration of the Bill and its recommendation that the Senedd agrees the general principles of the Bill, which it did on 9 December. However, I also note the concerns raised in evidence and commit to working in partnership to address them.</p>
<p>Recommendation 2: The Welsh Government should consult on and publish its building safety workforce plan as soon as possible. The plan should provide baseline data on current capacity for the undertaking of structural and fire risk assessments by competent persons and the undertaking of regulatory functions by the Building Safety and Fire Safety Authorities. It should include details of how and when progress in workforce development will be reviewed</p>	Accept in principle	<p>I agree with the Committee that the development of a workforce plan should be based on information on current skills capacity. We have established a workstream with a specific focus on local authority workforce capacity to resource the new building safety regime. Consultation with local authorities, WLGA and industry bodies underpins our approach.</p> <p>The workforce plan will focus on issues around recruitment, retention and skills development. The plan will feed into investment in skills and apprenticeship training under the new regime, so that we have a cohesive approach to workforce planning with clear milestones for development and review.</p> <p>Fire safety authorities will have similar functions under the Bill to those they have now under the</p>

		<p>Regulatory Reform (Fire Safety) Order 2005 (“FSO”). So, the Bill should not create the need for significant numbers of extra staff.</p> <p>Structural risk assessors and fire risk assessors are largely employed in the private sector, including by small businesses and as sole traders. We will continue to work with the fire safety sector and with the UK and other devolved governments to develop an agreed framework for fire risk assessor competence.</p>
Recommendation 3: The Welsh Government should undertake further work to ensure the additional resource requirements that will result from the Bill are fully understood.	Accept	Officials are working with local authorities and fire and rescue authorities to better understand the costs of the Bill. This work will inform the revisions to the RIA after Stage 2.
Recommendation 4: The Welsh Government should ensure that local authority landlords and housing associations receive such additional funding as is required to be able to discharge duties effectively	Accept in principle	<p>Officials will continue to liaise with local authorities and housing associations in preparation for implementation of the Bill and during the development of regulations made under it. This will include consideration of the cost implications of duties and how these might be funded.</p> <p>Decisions on long term funding will be for a future Government.</p>

<p>Recommendation 5: The Welsh Government should re-consider whether the fees that may be charged in accordance with the Bill for exercising regulatory functions should provide for full cost recovery. If not, the Welsh Government should clarify to the Senedd and those on whom regulatory duties are placed how any differences between the cost of exercising regulatory duties and the fees that may be charged are to be funded.</p>	<p>Accept in principle</p>	<p>If standard fee levels are kept reasonable and proportionate, it is unlikely that they could cover the full cost of regulating the regime. This is because only a relatively small proportion of buildings included within the new safety regime will be subject to such fees.</p> <p>Our agreement with local government, the Strategic Partnership Agreement, sets out the approach to funding, including in relation to new responsibilities. In accordance with that Agreement, there has been a commitment to ensuring that delivery partners are appropriately funded to be able to discharge all their duties effectively. Officials continue to work with them to ensure that there is a shared understanding of the likely costs arising from the Bill.</p> <p>Decisions on long term funding will be for a future Government.</p>
<p>Recommendation 6: The Welsh Government should engage with representative bodies on behalf of tenants and leaseholders, including those engaged in provision of legal advice, to consider the adequacy and effectiveness of existing legal protections against the passing on of unreasonable costs by landlords to tenants and leaseholders. The Welsh Government should also consider whether further</p>	<p>Accept</p>	<p>I accept the Committee's recommendation to consider the sufficiency and effectiveness of existing legal protections against the passing on by landlords of unreasonable costs to residents and leaseholders. We will continue to engage with representative bodies on behalf of tenants and leaseholders to ensure that there is an understanding of the legal protections</p>

<p>legal protections are needed within Welsh law, to ensure their suitability for the Welsh housing context</p>		<p>imposed by the Landlord and Tenant Act 1985 which imposes requirements for what costs can be taken into account when determining the amount of service charge payable. These requirements are that the costs are reasonably incurred and the service is of a reasonable standard. This will ensure that excessive costs are not permitted to be passed on to leaseholders.</p> <p>We are also working with the UK Government on legislative reforms to improve protections and provide additional rights to leaseholders in England and Wales. The upcoming draft Commonhold and Leasehold Reform Bill, which is due to be published by the end of the year, is expected to include important reforms for leasehold homeowners in Wales.</p> <p>Additionally, officials are currently analysing the responses to our joint consultation on ‘Strengthening leaseholder protections over charges and services’, which included detailed proposals for implementation of service charge transparency measures in the Leasehold and Freehold Reform Act 2024.</p>
<p>Recommendation 7: The Welsh Government should publish as soon as reasonably practicable (for consideration during</p>	<p>Accept</p>	<p>I believe that landlords should be required to consider other funding streams before passing on the costs of</p>

<p>the amending stages of the Bill at the latest) the findings of the work currently being undertaken to consider whether landlords should be required to consider other funding streams before passing on to tenants or leaseholders additional costs incurred in order to meet the Bill's requirements.</p>		<p>works via service charges to residents or leaseholders.</p> <p>I have therefore tabled an amendment that requires landlords, if they are an accountable person, to investigate other funding options for building safety works before claiming costs back through service charges.</p> <p>If a grant or funds are available, the accountable person would then be required to take reasonable steps to obtain them and deduct them from costs that may be charged via service charges.</p>
<p>Recommendation 8: The Welsh Government should provide clear justification for the inclusion of Category 3 buildings within the new building safety regime in terms of impact on the safety risk profile of Category 3 buildings. Due to insufficient evidence that the proposed approach to Category 3 buildings and HMOs is proportionate, the Welsh Government should consider adopting a stratified risk-based approach so that higher-risk Category 3 buildings and HMOs are brought into the new regime ahead of lower-risk Category 3 buildings and lower-risk HMOs</p>	<p>Accept in principle</p>	<p>The justification is that Category 3 buildings and HMOs are not "low risk". On the contrary, data consistently show a higher rate of fire casualties in HMOs and buildings converted into flats (almost all of which are in Category 3) than in purpose-built blocks. Furthermore, the Bill does not impose wholly new safety duties on these premises; it contains duties that are similar to those that already exist in the FSO, but which are tailored to the risks in residential buildings. The FSO will continue to apply in full until the Bill is brought into force. So delaying commencement would have no benefits at all; it would mean only that relatively high-risk buildings</p>

		<p>remained covered by the sub-optimal provisions of the FSO.</p> <p>We have taken a proportionate approach to the introduction of duties in Category 3. There is no duty to conduct structural risk assessments in Category 3 buildings or relevant HMOs, for example. Neither is there a requirement to register Category 3 buildings with the building safety authority.</p> <p>I have provided further information in the factsheet at Annex 1.</p>
<p>Recommendation 9: In light of the evidence received of the significant challenges to be faced in implementing the Bill's duties in respect of Category 3 buildings by the end of 2028, the Welsh Government should provide an update on its consideration of the timetable for the introduction of these duties</p>	<p>Accept in Principle</p>	<p>We will provide updates on the implementation of the Bill, but we do not believe there are significant challenges relating to Category 3 buildings. All Category 3 buildings are currently within scope of the FSO, and the duties the Bill would impose in respect of them are similar to those in the FSO, but expressed in clearer and more relevant terms.</p>
<p>Recommendation 10: The Welsh Government should engage with providers of specialist types of accommodation such as lighthouses to ascertain whether they should be within scope and ensure clarity is provided on all relevant types of accommodation to which the new regime does not apply.</p>	<p>Accept</p>	<p>I accept the Committee's recommendation to provide clarity to industry on all relevant types of accommodation to which the regime applies. We will continue to engage with the sector, including with those with an interest in specialist types of accommodation, to raise awareness of the new</p>

		regime and ensure the extent of its application is clear and understood. We are also encouraging future duty holders through representative bodies to prepare for the new regime. A greater focus on safety and engaging residents in buildings for which they are responsible is encouraged now.
Recommendation 11: The Welsh Government should ensure that clear definitions of the key terms used in chapter two of the Bill are provided in advance of the commencement of the provisions in this chapter, so as to ensure consistency in implementation of these provisions.	Accept	I consider the definitions in the Bill to be clear as drafted. The intention is that guidance issued under section 98 will include, amongst other things, guidance on the key terms in chapter 2 of the Bill where appropriate. In particular, we will consider the inclusion of examples of how the terms apply in practical scenarios and diagrams to aid understanding where appropriate.
Recommendation 12: The Welsh Government should engage further with relevant bodies including the Social Housing Law Association Wales, UK Finance and other relevant stakeholders to discuss and resolve concerns raised regarding the range of persons who could potentially be identified as Accountable Persons and Principal Accountable Persons and arrangements set out in the Bill for identifying them, including within buildings wholly owner-occupied. This is important in order to ensure lessons are learned from challenges experienced in England with arrangements for the	Accept	I accept the Committee's recommendation that the Welsh Government should engage further with relevant bodies to discuss and resolve concerns raised regarding the range of persons who could potentially be identified as accountable persons and principal accountable persons and arrangements set out in the Bill for identifying accountable persons and principal accountable persons. We will continue to engage with stakeholders, including Social Housing Law Association Wales and UK Finance, to ensure lessons are learned from challenges experienced in

identification of Accountable Persons and Principal Accountable Persons.		identifying accountable persons and principal accountable persons in England.
<p>Recommendation 13: The Welsh Government should ensure that guidance and support on the exercise of the duties of APs and PAPs are available in sufficient time before any persons are required to exercise such duties, to allow time for those identified as APs and PAPs to fully understand the requirements of the role and familiarise themselves with operational guidance before duties become effective.</p>	Accept	<p>I accept the Committee's recommendation that guidance and support on the exercise of the duties of accountable persons and principal accountable persons is available in sufficient time before any persons are required to exercise such duties.</p> <p>We recognise that timely guidance and support for accountable persons and principal accountable persons is pivotal to the success of the new regime and we will work with industry to develop the necessary guidance products.</p> <p>The guidance and support will be provided in good time prior to the commencement of the accountable persons and principal accountable persons duties for each of the building categories, and could include examples and diagrams where appropriate.</p>

<p>Recommendation 14: The Welsh Government should consult all relevant persons on any regulations to be made in respect of the meaning of a ‘competent person’ to carry out a fire risk assessment and in respect of how such assessments should be carried out, and provide adequate time for assessors and regulators to familiarise themselves with and prepare for new requirements set out or commenced in such regulations, before any such regulations take effect</p>	Accept	<p>I accept the Committee’s recommendation that the Welsh Government should consult all relevant persons on any regulations to be made in respect of the meaning of a ‘competent person’ to carry out a fire risk assessment and in respect of how such assessments should be carried out, and provide adequate time for assessors and regulators to familiarise themselves with and prepare for new requirements set out or commenced in such regulations, before any such regulations take effect. The Bill already requires consultation with relevant persons before making such regulations (sections 29(4), 31(3), 71 (4) and 73(3)). We will allow for those affected by the regulations to have as much time as possible to prepare for their coming into effect.</p>
<p>Recommendation 15: The Welsh Government should amend section 36 of the Bill to provide a more specific timescale for the preparation of a safety case report and its submission to the Building Safety Authority</p>	Reject	<p>Section 36 uses the phrase ‘as soon as reasonably practicable’. This phrase is often used in legislation because it recognises that it’s not always possible to achieve something in a set number of days. What is ‘reasonably practicable’ in one situation may differ in another. For example, setting a short, specific timescale would risk a principal accountable person being unable to meet that timescale, and consequently facing enforcement action, when it was not reasonable to have expected them to have met</p>

	<p>that deadline. Setting a longer specific timescale might allow and possibly encourage principal accountable persons to take longer to prepare and submit the safety case report than was required in the circumstances of the case.</p> <p>Requiring these actions to be taken 'as soon as reasonably practicable' is a fair and balanced way of approaching this matter. It avoids the arbitrary imposition of timescales that may either be unrealistically short or overly generous.</p> <p>Where a safety case report is not prepared as soon as is reasonably practicable, or a copy has not been submitted to the building safety authority as soon as possible after it has been prepared (in accordance with the duty set out section 36(4)) enforcement action can be taken by the building safety authority.</p> <p>Furthermore, section 41 provides the building safety authority with a power to direct the principal accountable person to apply for a building safety certificate within 28 days. Under section 42, that application must be accompanied by a current safety case report.</p>
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<p>Recommendation 16: The Welsh Government should amend the Bill to place a duty on Principal Accountable Persons to involve residents in the development of residents' engagement strategies, rather than specify in regulations when Principal Accountable Persons should consult residents on their preparation.</p>	Accept	<p>I accept the recommendation that the Welsh Government should amend the Bill to place a duty on principal accountable persons to always involve residents in the development of residents' engagement strategies. As such, I have tabled an amendment to section 39 to make provision on the face of the Bill requiring the principal accountable person to consult residents during the initial preparation of the strategy. However, we will retain the regulation-making power in subsection 39(7) to ensure that principal accountable persons must also consult residents in other circumstances specified in regulations when revising the strategy.</p>
<p>Recommendation 17: The Welsh Government should engage with those persons who may potentially be involved in the complaints processes to be established under sections 48 to 50 of the Bill, to consider if and how such processes can be made compatible with existing complaints processes. The Welsh Government should also engage with all regulatory bodies to whom complaints could currently be made against persons set out in sections 48 to 50 of the Bill, including the Public Services Ombudsman for Wales, to ensure the compatibility of new and existing complaints processes and to avoid duplication in processes.</p>	Accept	<p>Officials will engage with those persons who may potentially be involved in the complaints processes to be established under sections 48 to 50 of the Bill, to consider if and how such processes can be made compatible with existing complaints processes.</p> <p>The principal accountable persons and accountable persons, when meeting their requirements under sections 48 and 49 (as applicable), should be able to accommodate building safety complaints within any existing complaints processes they already have, providing the legislative requirements under the Bill are met.</p>

		<p>Officials have engaged with regulatory bodies, including local authorities and the Public Services Ombudsman for Wales, to consider the approach to handling of building safety complaints. They will continue to do so to ensure that there is no unnecessary duplication.</p>
<p>Recommendation 18: The Welsh Government should ensure that guidance prepared for Accountable Persons and Principal Accountable Persons in respect of residents' duties is clear that residents should be supported to meet their duties prior to enforcement measures being taken, and on how such support should be provided. The guidance should also reflect the additional support requirements of some vulnerable residents and ensure a proportionate approach to enforcement at all times</p>	<p>Accept</p>	<p>I accept the recommendation of the Committee that the Welsh Government should ensure that guidance prepared for accountable persons and principal accountable persons is clear that residents should be supported to meet their duties prior to enforcement measures being taken, and on how such support should be provided. Part of the rationale for the regulation making power enabling the placing of duties on accountable persons to provide building safety information to residents (section 46(1)(d)) is so residents are empowered to understand their rights and responsibilities under the regime.</p> <p>The primary focus of the duties placed on residents is to encourage a culture of safe resident behaviours. Should residents or owners of residential units breach their duties, we would expect informal steps to be taken by the principal accountable person or</p>

		<p>accountable person in the first instance by working with the resident to try and rectify the breach.</p> <p>I also accept the Committee's recommendation that guidance provided to accountable persons includes information on how residents should be supported in understanding their own duties under the Bill, with examples provided where appropriate.</p>
<p>Recommendation 19: The Welsh Government should consider steps to be taken to ensure that landlords or property owners who are not designated Accountable Persons or Principal Accountable Persons are fully aware of the duties and rights to be established by the new building safety regime, in order to be able to play their part in its implementation.</p>	<p>Accept</p>	<p>We are planning to extensively publicise the new regime through a comprehensive communication campaign to raise awareness of the requirements of the new regime and related duties.</p> <p>It is anticipated that the campaign will commence well in advance of Category 1 implementation in 2027.</p>

<p>Recommendation 20: The Welsh Government should engage with representative bodies on behalf of residents and other relevant persons to consider if withholding rent in accordance with section 65 of the Bill could give rise to unintended consequences for residents, and if so whether any changes are required to the Bill to avoid or address such consequences</p>	<p>Accept in principle</p>	<p>I am confident that the provision in section 65 is reasonable, as it is intended to ensure that residents are empowered with the vital information they need in order to raise any concerns about the safety of their building.</p> <p>Nevertheless, officials will continue to engage with representative bodies on behalf of residents and other relevant persons in relation to section 65 and all other matters in the Bill that impact them.</p>
<p>Recommendation 21: The Welsh Government should amend the Bill to provide further clarity as to the meaning of ‘relevant HMO’ outlined in section 67. In doing so, and in developing any subsequent regulations, engagement with the housing sector will be key to ensuring that all types of HMOs are taken into consideration and that all opportunities to simplify the definition are identified</p>	<p>Reject</p>	<p>I believe the legal meaning of “relevant HMO” in section 67 is already clear, and we have been unable to identify any amendments that would make the term easier to understand without changing its meaning. We will, though, publish guidance to explain the effect of section 67 in everyday terms.</p>

<p>Recommendation 22: The Welsh Government should provide clear guidance on the exercise of enforcement duties and powers and this should be provided in sufficient time to allow authorities to familiarise themselves with the guidance before the enforcement functions and powers take effect</p>	<p>Accept</p>	<p>We will provide full and comprehensive guidance in relation to the exercise of enforcement functions. To ensure that this happens, I have tabled an amendment for consideration at Stage 2 that would place a duty on the Welsh Ministers to issue guidance to building safety authorities and fire safety authorities on the exercise of their functions under the Bill and any associated regulations</p> <p>We will also ensure that the publication of this guidance happens in sufficient time for enforcement authorities to familiarise themselves with it before their functions are commenced.</p>
<p>Recommendation 23: The Welsh Government should give further consideration to the Bill's provisions on Special Measures Orders in light of the evidence received and discuss with local authorities, fire and rescue services and other relevant persons how special measures management functions can be effective in practice.</p>	<p>Accept</p>	<p>I will give further consideration to the Bill's provisions on Special Measures Orders in light of the evidence received and discuss with local authorities and fire and rescue authorities how special measures management functions can be effective in practice.</p> <p>I am aware of the concerns raised in relation to the capacity of enforcing authorities to bring forward a special measures order and the costs involved. This is something that we will explore further with the enforcing authorities at implementation. Whilst I do not currently consider changes are needed to the Bill's provisions, I agree that further consideration can</p>

		be given to this, including discussions with the enforcing authorities at implementation, to ensure that the tool is effective.
<p>Recommendation 24: The Welsh Government should bring forward amendments to include its preferred delivery model for enforcement on the face of the Bill. Amendments should also make it clear that not all 22 local authorities can be designated as Building Safety Authorities.</p>	Reject	<p>Any amendment on the face of the Bill that prescribes a particular model of delivery would remove the flexibility to adjust the model in the future to respond to changing circumstances.</p> <p>Under section 101(1)(b) of the Local Government Act 1972, local authorities already have the power to delegate non-executive functions to one another. This provides a ready-made mechanism for enabling the currently preferred model of concentrating building safety authority functions in a small group of local authorities that mirror the fire and rescue authority areas. I have tabled an amendment to section 100 of the Bill, which provides that functions of a building safety authority are not to be those of the local authority's executive, and this will ensure that the power set out section 101(1)(b) of the 1972 Act can be used by local authorities in this context.</p> <p>If it not possible to achieve the preferred delivery model through mutual consent, the Welsh Ministers have a power to direct the delegation of functions under section 102 of the Bill. To further facilitate this, I</p>

		<p>have tabled a Stage 2 amendment to section 102, that would enable the Welsh Ministers to direct multiple building safety authorities to arrange to delegate functions to one of their number rather than rely on multiple directions to achieve the same effect.</p> <p>I will, however, consider whether there is any other amendment that could be brought forward to further facilitate the implementation of a preferred delivery model, without losing the flexibility provided for in the Bill currently.</p>
<p>Recommendation 25: Given the intention to base Building Safety Authority teams within local authorities, the Welsh Government should work with local authorities to identify solutions to their concerns about taking on the responsibilities of Building Safety Authority including the problem of uncompetitive salaries for key roles within those teams.</p>	<p>Accept in principle</p>	<p>I recognise that the local authority salaries for some building safety roles can be uncompetitive within the wider jobs market. We have commissioned Local Partnerships to advise, and work with, local authorities on developing a “critical path” to implementation. Their work includes how resourcing pressures can be overcome, for example through paying a market supplement for particular staff.</p>

<p>Recommendation 26: The Welsh Government should make an urgent statement on the measures it intends to take, beyond those being taken at present, to address slow progress by some developers and to accelerate the pace at which remedial works are undertaken to address historic deficiencies in buildings in Wales.</p>	Accept	I will make a written statement before Christmas recess to update the Senedd on the progress being made and address stakeholder concerns with the remediation programme.
<p>Recommendation 27: The Welsh Government should amend the Bill to include provisions for legally enforceable deadlines and sanctions in respect of remediation, and for penalties for failures by developers to address deficiencies within required timescales</p>	Reject	Developers have signed up to a contract committing to remediate the buildings they are responsible for. It would not be appropriate to include legally enforceable deadlines for remediation in the Bill.

Conclusion	Government Response
<p>Conclusion 1: We support the Welsh Government's intention to work with delivery partners to develop a building safety workforce plan to ensure the Bill's requirements can be met in future, and to establish a degree apprenticeship scheme for environmental health officers. Workforce planning will be key to the successful delivery of the new building safety regime for Wales and should be prioritised.</p>	I welcome the Committee's support for our work with delivery partners to develop a building safety workforce plan to provide more certainty for stakeholders on implementation. We will work with stakeholders to understand where skills training can be expanded and where new degree apprenticeship programmes can be developed.

<p>Conclusion 2: We recognise that many of the organisations and services upon whom responsibilities will be placed by the Bill are already under financial pressures and that they may struggle to meet additional resource requirements</p>	<p>Work is already underway with local authorities to further examine the cost and resource implications of the building safety authority functions. I am committed to ensuring that our delivery partners are appropriately funded to be able to discharge all their duties effectively. Our agreement with local government, the Strategic Partnership Agreement, sets out our approach to funding, including in relation to new responsibilities.</p>
<p>Conclusion 3: The evidence received demonstrates that this Bill could have an unintended consequence on housing supply in Wales and may therefore impact upon achievement of the Welsh Government's targets for increased social and affordable housing supply. The Welsh Government should reflect on the evidence received and consider whether changes are required to the Bill to ensure consistency with the policy aim of increasing social and affordable housing supply</p>	<p>We are committed both to increasing social and affordable housing supply and to improving building safety.</p> <p>Whilst I acknowledge some of the evidence the Committee heard was that the Bill may have an indirect impact on housing supply, we will not help to solve the challenges we're facing in housing by putting people into unsafe homes.</p> <p>We know from our engagement with social housing providers that many of the measures set out in the Bill have already been implemented by them. I saw this firsthand when I visited St Tydfil's Court in Merthyr Tydfil in the summer.</p>
<p>Conclusion 4: We do not believe that the Welsh Government has made a clear case that the inclusion of Category 3 buildings and HMOs within the new regime is necessary. It has not demonstrated that the additional costs and resource implications arising from greater regulation, and the potential risk to housing supply, would be proportionate to any safety benefits to be achieved via the application of the new regime to such buildings</p>	<p>The risks are significant in all multi-occupied buildings, not just tall ones. Fires also occur in smaller buildings occupied by multiple households, and on some measures, these are the most hazardous of all. We cannot ignore the evidence.</p> <p>If we did not include Category 3 buildings or relevant HMOs in the Bill, they would just continue to be subject to the FSO, which was</p>

	not designed for residential buildings and is complex for landlords to understand and apply. Our independent analysis estimated that the average annual cost of the regime would be unlikely to make building owners or landlords exit the market.
Conclusion 5: We welcome the Cabinet Secretary's commitment to engage with representative bodies on behalf of disabled people to identify suitable protections for vulnerable residents in regulated buildings and how best to establish such protections.	I recognise the importance of engaging with representative bodies to identify suitable protections for vulnerable residents and will continue to engage interested parties as we develop proposals and options.
Conclusion 6: We welcome the Cabinet Secretary's commitment to provide to Accountable Persons and Principal Accountable Persons such guidance and support as will be required to be able to undertake their duties effectively. This will be key to the effective delivery of the Bill's aims	I fully support the Committee's conclusion and believe it is essential to the success of this regime that accountable persons, and others, are supported. We are committed to issuing guidance to support those with duties under the regime.
Conclusion 7: The Welsh Government should consult all relevant persons on any regulations to be made under section 33 relating to structural risk assessments, and provide adequate time for those assigned duties in respect of structural risk assessments to familiarise themselves with and prepare for new requirements set out in such regulations, before any such regulations take effect	Section 33 places a duty on the Welsh Ministers to consult with all relevant persons before making regulations under this section. I agree that adequate time must be provided for those subject to the duties that will be placed upon them under the Bill, including in relation to structural risk assessments, to familiarise themselves with and prepare for the new requirements, prior to any regulations or new duties taking effect.

<p>Conclusion 8: We note the calls made for structural and fire risk assessments to be conducted holistically rather than separately, due to the interdependence between structural and fire risks within buildings. While we do not have a view on whether or not the Bill should be amended accordingly we acknowledge that this may be an issue for further consideration by the Welsh Government and relevant stakeholders.</p>	<p>While there is some overlap between fire and structural risks, particularly in that structural defects can compromise compartmentation, the two types of risk are not generally interdependent. There are many common examples of fire hazards which have no structural implications at all, such as defective or missing fire doors, obstructed escape routes, accumulations of combustible waste in common areas, inadequate emergency lighting and signage, and poorly maintained electrical installations, firefighting lifts or smoke control systems. Equally, structural problems like subsidence, penetration of foundations by groundwater or tree roots and overloaded balconies typically have no fire safety implications. The two types of risk are also basically different. Fire can break out at any time and does so suddenly, while most structural problems develop very slowly and gradually. Therefore, the approach to, and frequency of, assessing such risks should also be different.</p>
<p>Conclusion 9: We agree with the view expressed that it would be useful for the Welsh Government to provide a template for safety case reports and other documents that must be prepared in accordance with the Bill's requirements, as a means of helping to address concerns raised about the resource implications of such duties for delivery partners</p>	<p>I accept the Committee's conclusion that templates could be helpful. We will consider this as we work with partners and stakeholders to determine the appropriate format for the documents that must be prepared in accordance with the Bill's requirements.</p>

<p>Conclusion 10: We agree that it will be important for all parties to be fully aware of the requirements upon them, whether as occupiers or as landlords. We therefore welcome the Cabinet Secretary's assurance on the development of a residents' handbook. However, we are not aware of arrangements to raise awareness among landlords or property owners who are not Accountable Persons or Principal Accountable Persons, and ask for further information from the Cabinet Secretary on how this will be done</p>	<p>My officials are exploring the development of a residents' handbook to support residents and owners of residential units in understanding their rights and responsibilities under the new regime. The handbook will help residents and owners who are landlords to understand what their duties mean in practice.</p> <p>We are planning to extensively publicise the new regime through a comprehensive communication campaign intended to raise awareness of the new regime.</p>
<p>Conclusion 11: We believe that clarification of key terms used in Chapter 7 in respect of residents' duties is needed to ensure clarity on persons to whom such duties apply, including the term 'adult resident'</p>	<p>We will ensure that the explanations of key terms in respect of resident duties are explained in the residents' handbook, setting out examples if needed.</p>
<p>Conclusion 12: We agree with the Cabinet Secretary that the success of the policy aim of the requirement in section 65 relating to the provision of building safety information to residents will depend on such information being appropriate to residents' needs and presented in a way which is understandable to them. Regulations made in respect of the provision of such information will need to take into account the additional work and resources required of those on whom duties are placed and ensure an appropriate balance between information to be provided to residents and information which should be 'made available'</p>	<p>It is our intention to use regulations under new section 49B(5)(e) of the Landlord and Tenant Act 1987 (as inserted by section 65 of the Bill) to set out what relevant building safety information, in addition to what is already set out in subsection (5) must be given to tenants under sections 47B and 49B of the Landlord and Tenant Act 1987. That information is not intended to be overly onerous on landlords - the intention is to ensure that vital building safety information is given to tenants.</p>

<p>Conclusion 13: If enforcement functions and powers provided by the Bill are to be split between Building Safety Authorities and Fire Safety Authorities, both will need clear guidance from the Welsh Government on how they should work together to enforce their legislative duties and requirements. Guidance should also set out how the enforcement functions and powers in this legislation will interact with existing enforcement functions and powers set out in current building safety legislation</p>	<p>I accept the Committee's conclusion. We will publish guidance accordingly, working with enforcing authorities on its development. To that end, I have tabled an amendment that will require the Welsh Ministers to publish guidance on the exercise of functions by enforcing authorities. Another amendment will require building safety and fire safety authorities to co-operate with each other in the exercise of their relevant functions in certain circumstances. Guidance issued by the Welsh Ministers may include advice on compliance with this co-operation duty.</p>
<p>Conclusion 14: Whilst we recognise that the proposal for three Building Safety Authorities with jurisdictions mirroring the footprint of each of the three fire and rescue services will be attractive to at least some of our witnesses, it is regrettable that the Welsh Government's preferred delivery model for enforcement was not made known in time for us to consider it in the detail during our stage one scrutiny. We have not been able to consider the costs and benefits of the proposed model or the potential risk of duplication of responsibilities that may arise from establishing more than one regulatory authority</p>	<p>The preferred delivery model is not explicit in the Bill and therefore is not costed.</p>
<p>Conclusion 15: We acknowledge the representations made in respect of the volume of detail on implementation being left to guidance and regulations and not included within the Bill. We note that the Senedd's Legislation, Justice and Constitution Committee has considered this issue in detail</p>	<p>I have considered the recommendations of the Legislation, Justice and Constitution Committee and written to the Committee with my response.</p>

<p>Conclusion 16: We welcome the Welsh Government's commitment to provide support and guidance on the exercise of duties imposed by the Bill before duties take effect.</p>	<p>I am grateful to the Committee for recognising our approach to providing support and guidance on the exercise of duties imposed by the Bill prior to their commencement and are committed to a smooth transition to the new regime where duty holders have the timely information to allow them to prepare for undertaking their responsibilities.</p>
<p>Conclusion 17: Our understanding of the approach to remediation adopted by the Welsh Government, as described by the Cabinet Secretary, is that it is dependent upon the goodwill of developers to begin works by the end of 2026, with no legal requirement to abide by this date. There is also no deadline, legislatively backed or otherwise, for completing works. Whilst we acknowledge that some progress has been made we are of the view that a different approach must now be taken to ensure that life-threatening historic deficiencies within buildings are addressed urgently</p>	<p>I am pleased to note that all developers signed up to the Welsh Government contract have agreed to begin remediation works by the end of next year. We continue to monitor the delivery of the contract closely and should the agreed terms not be met we would take steps to address this.</p>
<p>Conclusion 18: We welcome the Cabinet Secretary's acknowledgement that solutions are needed to ensure vulnerable and disabled people are evacuated quickly and safely in the case of a fire in a regulated building. We note the Welsh Government's ongoing engagement with disabled people and look forward to hearing the outcomes of the work to be undertaken to explore such solutions</p>	<p>My officials are exploring options and solutions to ensure vulnerable and disabled people are evacuated quickly and safely in the case of a fire. We are committed to working with our stakeholders to identify the most appropriate means of ensuring provisions are in place to plan for the evacuation of residents whose ability to self-evacuate is compromised. We look forward to sharing the outcomes of this work upon completion.</p>

Conclusion 19: We note that the Senedd's Legislation, Justice and Constitution Committee has considered in greater detail the issue of consultation with residents on regulations and guidance made and issued in line with the Bill.

I have consider the recommendations of the Legislation, Justice and Constitution Committee and written to the Committee with my response.

Annex 1: Building Safety (Wales) Bill

Category 3 buildings and Relevant Houses in Multiple Occupation

Risks

Category 3 buildings and Houses in Multiple Occupation are among the highest risk premises for fire.

StatsWales data indicate broadly similar casualty rates of around 25 casualties per 100 fires in both converted premises and in purpose-built blocks since 2009. The difference becomes starker when different levels of occupancy are factored in. For example, take a 3-storey house converted into 4 flats with 10 residents and a 10-storey tower block with 40 flats and 100 residents. If a fire breaks out in both of them, any given individual in the converted building is, all other things being equal, more than 10 times as likely to be killed or injured than any given individual in the tower block. There are several reasons why this might be so, the simplest being that individuals in the smaller converted building are more likely to be close to the fire than those in the tower block. But it would be plainly wrong to see Category 3 buildings as low risk simply because of their size; indeed their small size may well contribute to them being relatively high risk.

Fire Safety Duties

The Regulatory Reform (Fire Safety) Order 2005, or “FSO”, currently applies to all Category 3 buildings and all Houses in Multiple Occupation that are covered by the Bill. The Bill, and regulations made under it, will create a regime that is tailored to the risks in residential premises. It includes broadly comparable duties to those that currently apply under the FSO, for example:

Regulatory Reform (Fire Safety) Order 2005	Building Safety (Wales) Bill
Duty to take general fire precautions (art.8)	Duty to take steps to minimise fire risk (s31)
Duty to make a “suitable and sufficient” fire risk assessment (art.9(1))	Duty to conduct a fire risk assessment (s28) Requirement for a fire risk assessment to be made by a competent person (s29)
Duty to review assessment and keep it up to date (art.9(3))	Duty to review assessment annually and redo it if out of date and/or if “trigger events” occur (s30)
Duty to apply “principles of prevention” (art.10 and Sch.1)	Duty to pursue fire safety outcomes (s32(2)).

New Duties

Proposed new requirements	Rationale
Duty to keep information and documents <i>This includes information and documents important for assessing and managing fire safety risks. The requirements will be set out in regulations but may include: a copy of the most recent fire risk assessment; information about complaints raised by residents relating to fire safety risks and any action taken by the PAP or AP in response to those complaints.</i>	It is important that key information about buildings is securely maintained and accessible throughout the building’s lifecycle. This formed part of the recommendations made in the Hackitt Review, which called for greater transparency for residents. The review highlighted widespread concern over the ineffective operation of existing rules for creating, maintaining, and handing over building and fire safety information. The intention is that this duty will be applied in a proportionate way to Category 3 buildings. It will only extend to information about fire safety risks.
Duty to give information and documents to other persons	A key recommendation of the Hackitt Review. Hackitt emphasised that residents need access to clear, accurate information to understand the safety measures in place and to

<p><i>Regulations will set out the information to be provided to residents and what must be made available, if requested.</i></p>	<p>play an active role in managing risks. Section 46(2) provides that the regulations may specify when and how the information or copies of documents must be given, and the format in which they must be given. These regulations will be subject to public consultation.</p>
<p>Duty to arrange consideration of complaints*</p> <p><i>Regulations will set out the arrangements for the consideration of complaints in categories 2 and 3 that are proportionate, effective, and tailored to the needs of residents. For a category 3 building, this might include:</i></p> <ul style="list-style-type: none"> • <i>Providing residents a point of contact, such as an email address or phone number, to make a complaint</i> • <i>Informing residents of how a complaint will be resolved</i> • <i>Providing residents information on how to escalate a complaint to the BSA</i> 	<p>A key recommendation of the Hackitt Review. Hackitt reported many residents lack clarity on who to contact or how to raise safety concerns, leading to a loss of confidence in those responsible for managing their buildings. Section 49 addresses this by requiring accountable persons in Category 3 buildings to make, and give effect to, arrangements for considering complaints. Regulations made under this section will be subject to public consultation.</p>
<p>Co-operation and co-ordination duty</p>	<p>A key recommendation from Hackitt. Hackitt identified the need for clear collaboration across all duty holders. The co-operation and co-ordination duties in section 60 ensure persons with responsibilities for assessing and managing building safety risks work together to deliver a 'whole building' approach. This is critical because safety risks do not respect boundaries between different parts of a building.</p>

*Does not apply to Houses in Multiple Occupation