



promoting equality in housing  
hybu cydraddoldeb ym maes tai

## Tai Pawb

### Response to:

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## Who we are

Tai Pawb (housing for all) is a registered charity and a company limited by guarantee. We are Wales' leading national organisation promoting equality and diversity in housing. We imagine a Wales where everyone has the right to a good home. Too many people in Wales don't have somewhere to live in security, peace, and dignity: we are determined to change that. We support and work with our members to help them put ideas into practice while influencing policy makers to make housing policy fair. We are the thought leaders on equality, diversity, and human rights issues for the housing sector and beyond.

Tai Pawb operates a membership system which is open to local authorities, registered social landlords, third sector organisations, other housing interests and individuals.

## What we do

Tai Pawb works closely with the Welsh Government and other key partners on national housing strategies and key working groups, to ensure that equality is an inherent consideration in national strategic development and implementation. The organisation also provides practical advice and assistance to its members on a range of equality and diversity issues in housing and related services, including QED – the equality and diversity accreditation for the housing sector.

For further information visit: [www.taipawb.org](http://www.taipawb.org)

Charity registration no. 1110078

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## 1. Introduction

- 1.1 Tai Pawb welcomes the opportunity to respond to this consultation on Social Housing supply in Wales. We believe social housing plays an essential role in addressing poverty, including housing (and wider) inequalities. Wales' housing emergency highlights social housing is needed more now than ever. The aftermath of Covid-19, rising cost of living, Ukraine, and Afghan refugee crises and significant challenges in adequately financing public services mean housing is under unprecedented, sustained pressure. Inflation has left social landlords struggling to maintain and build new properties. With record numbers in Temporary Accommodation and a huge waiting list for social housing, **we need more social housing** in Wales. We recognise Welsh Government's commitment to creating 20,000 social homes over this Senedd term. While we commend this commitment, alone it is insufficient to resolve our housing emergency.
- 1.2 This submission will focus on the areas relating to social housing and our expertise around tackling inequalities. Initially, we'll focus on a right to adequate housing and the "bigger picture" questions we feel need to be posed. Following this, we'll provide more detail into specific areas including ensuring the right type of homes, the planning system, investment, and acquisitions.
- 1.3 Our [Back the Bill](#) partners Shelter Cymru and the Chartered Institute of Housing Cymru will also be responding to this consultation, and we endorse their responses. As a coalition, we believe there is an urgent need in Wales for 'systems change' in our approach to housing. This starts with considering the housing system as a whole, recognising interdependencies exist.
- 1.4 Tai Pawb welcomed the opportunity to present verbal evidence at the Committee's recent hearing into the Private Rental Sector. At the conclusion of the session, there was broad discussion and agreement on the need to broaden these focused conversations to look at the bigger

picture. Doing so can allow for longer-term, collaborative, and sustainable change. Without this, we fear our housing emergency will continue and people across Wales will struggle to have the suitable, affordable, and safe home they deserve.

## 2.The role of social housing in Wales

### 2.1 Social housing provides [affordable, good quality and secure homes](#).

Given the cost-of-living crisis, challenges in the PRS and the need to decarbonise our housing stock - clearly social housing is one piece of the jigsaw to solve our housing emergency. But social housing does not operate in a vacuum - it's one part of the housing system in Wales. To best understand the supply of social housing it's necessary to first consider the following questions centred around what we as a society want it to fulfil:

- The role of social housing in Wales and its purpose – *What do we want social housing to achieve and how do we know if it's successful?*
- Who social housing is for – *Is it a universal right or should it be more narrowly defined? If it's more limited in scope – how do we define this (and those who are not suitable)?*
- Identify communities currently poorly served by social housing – *Understand whether there are any communities (of both people and place) currently poorly served by social housing – why is this the case and what can be done to rectify it?*
- Identify any complimentary alternatives - *Given the focus on social housing and the Private Rental Sector, identify alternatives to compliment them which meet a need – i.e., Community-land trusts.*

### 3. The need for a housing strategy

- 3.1 While answering the questions posed above may help inform better social housing supply, solely answering these questions in isolation will only provide a partial answer. To fully understand and make the ‘systems change’ we need in housing in Wales – we can’t just have a plan for social housing. Or a plan for the private rental sector, or owner occupiers as all impact on each other. If we want to end our housing emergency, we first need to have a plan for housing in Wales for the 21<sup>st</sup> Century. The type of change required won’t be achieved through investigating and seeking to resolve one area of our housing system at a time. Wales needs a housing strategy – and having this in place should be a priority to carefully plan future policy, laws, and investment.
- 3.2 A housing strategy can ensure a proper evidence-based approach to home building can be developed – based on the number and type of homes across tenure. While there is a lot of emphasis on the 20,000 homes – do we know if this is enough? Research commissioned by Back the Bill partners and undertaken by Alma Economics assumed in addition to the existing commitment, a further [20,000 social homes](#) would be required if we are to meet growing demand. The type and location of homes will also be crucial.

### 4. The right to adequate housing

- 4.1 The summer of 2024 will see the publication of a White Paper on incorporating the right to adequate housing in Wales. We welcome the interest in this area of the Welsh Government and it’s potential to solve the housing emergency. In our view, the right to adequate housing is the essential ‘systems change’ needed to ensure everyone has a home fit for the 21<sup>st</sup> Century. Adequacy is recognised by the UN through a framework of [seven factors](#) (with the recent addition of sustainability) and the changes expected include:

- Decriminalisation of homelessness
- Commitment of the maximum available resources and no retrograde steps
- Community participation in housing planning and strategy
- Additional scrutiny and mechanisms to hold government to account
- The publication of a housing strategy with milestones and timelines to ensure it is achieved.

4.2. Specifically, we believe the right to adequate housing could help deliver more social homes through:

- Increased investment – The right to adequate housing means a commitment to the maximum available resources (including land, staff, finance, and technology). This commitment means the Welsh Government would have to strongly consider the level of resources needed to fulfil the right to housing and consider investing more. While there is a commitment to building 20,000 social homes this Senedd term, Alma’s [cost-benefit analysis](#) assumed a further 20,000 social homes are required to realise a right to adequate housing.<sup>1</sup>
- Political pressure – A right to adequate housing would place increased pressure and scrutiny on the Welsh Government to deliver on its commitments – for instance how it is currently delivering on its commitment to 20,000 additional social homes.
- Community involvement in the planning regime – Enhanced participation would mean that the right types of social homes meeting community’s needs were built. This is essential with an ageing population and high levels of disabled people already accessing social housing.
- Provide and drive a long-term goal and vision – A right to adequate housing would require the Welsh Government to provide a long-term

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<sup>1</sup> To calculate a Cost-Benefit model to realise the right to adequate housing Alma calculated a figure of a further 20,000 social homes. For further information of their model and assumption, see [pages 8-10](#) of their research, “The right to adequate housing in Wales: cost-benefit analysis.

strategy with milestones, costs, and timelines. This would help social housing as it would help clarify the number of homes needed, funding to deliver them and how the Government feel social, the private rental, and owner-occupied sectors are interconnected.

- Complement existing (and proposed) policy and legislation – The Welsh Government produced ambitious proposals last year to help end homelessness. While we welcome these proposals, they lacked a focus on supply. Given the focus of the White Paper on extending the groups eligible for support, there will be a natural need to enhance the supply of social homes. We believe a right to adequate housing would therefore strengthen this proposed legislation – as well as others in delivering social housing.

## 5. Progress towards meeting the target of 20,000 low carbon social homes

5.1 We understand from conversations with partners that progress on creating the 20,000 homes has been difficult. Challenges include environmental issues (phosphates), inflation and global supply chain. Recognising these challenges on delivering the target, Tai Pawb's concern is less about the number of homes built, but more about ensuring new homes meet local demand (and sustainability requirements) while having an understanding of who currently uses social housing.

5.2 We know certain groups are overrepresented in social housing. Some 34% of social tenants are disabled compared to 21% the general population, while ethnic minorities make up around 8% of social tenants compared to 6.3% of the population (Census 2021). We also know that Ethnic minority groups are much more likely to experience overcrowding: 3.8% of White British people in Wales experience overcrowding compared to 24.6% of Gypsy or Irish Travellers, 25.5% of Bangladeshi people, 24.5 % of Black African people, 21.2% of Pakistani

people and 19.9% of Arab people (Census 2021). Based on these facts, it's fair to assume that social housing needs to be designed to be suitable for disabled people and ethnic minority groups; some of whom for example are more likely to live in multi-generational homes.

- 5.3 In Wales we have what the EHRC call a [hidden housing crisis](#) – not enough accessible homes. The number of older people with physical impairments is estimated to rise by over [50% between 2015 and 2035](#). Based on what we know around the population currently accessing social housing, it is likely that there will be a growth in the number of disabled people who need social housing or are already living in social housing in the medium–long term. Connected to this issue is accessibility standards for non-social housing which remain basic. There needs to be an increase in private housing accessibility standards and building regulations. In England, the UK Government has [consulted](#) on this. While their building regulations already define a visitable home and a wheelchair accessible home (which Welsh standards don't) which enables them to [forecast delivery](#) compared to need.
- 5.4 Currently there is no national plan for how we will meet this growing need for accessible homes. Data is also limited – with no data available demonstrating to what extent accessible housing need is met or unmet. For example, Lifetime homes and Wheelchair accessible homes. In England, the UK Government is better able to do this because of the English Housing Survey which allows for more [specific plans](#).
- 5.5 The Welsh Government have prioritised a target of creating 20,000 social homes over this Senedd term. While we welcome this ambition, Tai Pawb believe the Welsh Government needs a more detailed understanding of the diverse needs of the people who need social housing. A solely 'unit led' approach means there is a real risk that by focusing on the total number of homes, the wrong type of homes could be built in the wrong places. Resolving this can be achieved through the better alignment of local needs with national data and needs assessment. We strongly believe a Welsh Housing survey would be hugely beneficial to this process and would give more meaning to



targets across all sectors. Data could then be used to guide future policies and targets.

- 5.5 In 2019, the Welsh Government declared a climate emergency and has also published plans to have a carbon free economy by 2050. This is recognised within the target of 20,000 homes with the focus on being low carbon. However, climate change is about more than just reducing carbon footprint. Research by Dr Satish BK looked at kitchens and differences between white British and Asian British households. It found Asian British households studied had much more condensation, higher average temperatures and higher Co2 emissions, due to longer cooking times than average and being less likely to open windows. Given that the weather is likely to be warmer and wetter in the future as a result of climate change– this study highlights a risk for all social housing – especially when there is a focus on houses retaining heat. Therefore, future social houses need to have better ventilation systems in place to prevent damage to people’s homes and also their health.

## 5 How effectively the planning system is supporting social housebuilding

- 5.1 As an organisation, we do not regularly deal with the planning system. As an ethos, Tai Pawb support enhanced participation in the planning system by communities, as outlined by the right to adequate housing. Recognizing participation can come with risks, steps need to be taken to ensure those traditionally marginalised or ‘seldom heard,’ including people with ethnically diverse backgrounds, are heard in the process. Participation should also allow for different communication needs, for instance people whose first language is neither English or Welsh and people who are neurodivergent.
- 5.2 More broadly, we feel research would be beneficial to understand if there are any groups of people who particularly miss out on the planning system in relation to social housing. For instance, are certain types of homes harder to get approval for? Understanding who these groups of people are and why properties suitable for them struggle to be built could see improvements to existing processes.

5.3 Undertaking the research above could allow a wider discussion on which groups of people or communities are negatively affected by the planning system as a whole across tenures. Highlighting whether our current tenure mix is right in terms of owners, private renters, or social tenants and if there is a need for other models to fill this gap. For instance, community land ownership.

## 5. The potential for acquisitions of existing homes and remodelling of existing buildings

6.1 Engagement with our members has identified that there is potential for remodelling existing buildings to better meet the demand for social housing. In particular Taff housing have achieved this through loft extensions and by re-converting buildings previously split into flats into family homes. Doing this successfully not only provides a home but one that best meets the needs of an area and individuals/families within it, as well as tackling overcrowding. We know that overcrowding particularly affects certain ethnic minority communities - therefore there are opportunities to use this approach in certain areas, easing housing challenges while helping Wales become an anti-racist nation.

6.2 Caerphilly Keys, led by Caerphilly County Borough Council, helps private landlords find long term tenants for properties, while also preventing homelessness. Support offered includes managing a tenancy, budgeting, maximising income, alleviating debt, support with education, learning and employment, and referral to other organisations. One landlord who has used the scheme for many years commented: “Working with the Local Authority to provide suitable accommodation in this difficult sector and receiving their guidance and support at every turn, has been to our mutual benefit. The Local Authority has access to resources far beyond ours, not only within the Authority but also in the private sector. These include health, mental health, drug dependence, debt, counselling, etc.”

6.3 Given the challenges around interest rates rises, and in particular difficulties for the buy-to-let market, there may be increased numbers of landlords looking to sell properties. This is supported by evidence in last year’s Green Paper into the right to adequate housing highlighting a number of landlords are either at or approaching retirement age and

may be looking to leave the sector soon. Now might be a good time for increased funding to allow Social Landlords to purchase homes and convert them to social lets. This would have the short-term benefits of increasing the number of affordable and social homes, reducing the competition while in the longer-term helping to rebuild our social housing stock.

## **7. Conclusion**

7.1 Wales needs more and better social housing to help resolve it's housing emergency. While the Welsh Government recognises this in its target of 20,000 social homes this Senedd term, it's not clear how this target was set and how many further social homes will be needed to truly tackle Wales' housing crisis.

7.2 Taking a step back, while it's clear we need more social homes – this is only part of the solution. We first need to understand and identify:

- The role of social housing
- Who is it for?
- Identify communities currently underserved by social housing
- How many homes and where should they be?

7.3 These questions need to be fully explored in how they fit in with the wider housing sector. To do this, we need a Welsh Housing strategy. We believe this can be one of the first steps in achieving the 'systems change' required to resolve our housing emergency.