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15<sup>th</sup> August 2025

John Griffiths MS  
Chair of the Senedd Local Government & Housing Committee  
Welsh Parliament  
Cardiff Bay  
Cardiff  
CF99 1SN

Sent by email: [seneddhousing@senedd.wales](mailto:seneddhousing@senedd.wales)

Dear John,

I write to express the NRLA's concerns regarding the Local Government and Housing Committee's scrutiny of the Homelessness and Social Housing Allocation (Wales) Bill.

While we welcome the fact that the Committee heard from a range of experts, including those from the social housing sector, tenant organisations, and the legal profession, we are concerned that no providers of private rented housing – the sector responsible for supplying a substantial proportion of homes in Wales - were called to give their perspective on the Bill.

We believe it is a significant oversight that the Committee appears not to have considered housing provision in the round, focusing narrowly on the social housing sector without reflecting on the vital role that the private rented sector plays in meeting housing need.

With over 110,000 members across England and Wales, we are the largest membership organisation representing residential landlords. Collectively, our members own and manage around 10% of privately rented homes in England and Wales, equating to over one million properties. As such, our members play a key role in preventing homelessness and providing homes for vulnerable people, particularly where social housing supply is limited.

A key theme of our written evidence to the Committee was our concern that several of the Bill's provisions, such as the expansion of the definition of those "threatened with homelessness" to 6 months, will not take effect until there is a "robust" supply of housing. However, the Welsh Government has not defined what constitutes a "robust" supply, and, given the long-term decline in housebuilding, there seems no realistic prospect of achieving this in the near term.

We are also concerned about how the removal of the intentionality test and the introduction of the deliberate manipulation test will operate in practice. The majority of possession notices served in Wales are fault-based, often linked to arrears. As a result, tenants in breach of contract may be at a higher risk of being classified as intentionally homeless.

This is particularly pertinent in relation to rent withholding provisions under the Renting Homes (Wales) Act. Tenants are entitled to withhold rent if they believe a property is unfit for human habitation or where written statement requirements have not been met. However, only the courts can determine whether such claims are valid. If a court later disagrees with a tenant's assessment,

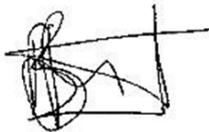
they will immediately owe all withheld rent, placing them at risk of serious arrears and eviction. This creates uncertainty for both tenants and local authorities, who cannot definitively advise on whether rent is owed.

Without clear guidance and safeguards, there is a real danger that tenants could inadvertently fail the deliberate manipulation test, undermining the Bill's aim to strengthen homeless prevention. The Welsh Government must therefore provide unambiguous guidance to enable local authorities to assess deliberate manipulation consistently and fairly.

We support the Bill and its ambition to strengthen homelessness prevention, but we urge the Committee to ensure that our concerns are reflected in its work. Only with clear definitions, safeguards and sufficient resourcing can the Bill deliver meaningful outcomes for those it seeks to support.

We would be pleased to provide further evidence to the Committee on these issues or meet to discuss in greater depth how the private rented sector can help deliver the Bill's objectives. Please contact [policy@nrla.org.uk](mailto:policy@nrla.org.uk) to arrange a convenient time.

Yours sincerely,



Ben Beadle  
Chief Executive

Copy to: Jayne Bryant MS, Cabinet Secretary for Housing and Local Government  
Lili Thompson, Senior Private Sector Housing Policy Manager

Ben Beadle  
Chief Executive  
NRLA

26 August 2025

**Homelessness and Social Housing Allocation (Wales) Bill**

Dear Ben,

Thank you for your letter of 15 August regarding the Homelessness and Social Housing Allocation (Wales) Bill and for your written response to the Committee's consultation. We are grateful for your offer of presenting oral evidence on the Bill, however I'm afraid we are unable to facilitate this due to time constraints.

The timetable for scrutinising the Bill is set by the Senedd's Business Committee and is therefore outside the Committee's control. As such, our final oral evidence session with the Cabinet Secretary for Housing and Local Government has been confirmed for our next meeting on 18 September. This session cannot be deferred due to the time constraints mentioned and other legislative commitments.

I have noted the concerns raised in your letter and have shared your correspondence with the other Members of the Committee for their awareness. The provisions relating to intentionality have been of particular interest to Members during our scrutiny of the Bill, which I'm sure we will discuss further with the Cabinet Secretary at our forthcoming evidence session.

Although it will not be possible to hear oral evidence from the NRLA on this occasion, we are grateful for your written evidence which will feed in to our consideration of the key issues for our report on the Bill. Should you wish to submit any further evidence in writing to supplement your consultation response, we would be happy to receive this by Wednesday 10 September.

Thank you for your engagement with the Committee on this and your previous contributions to our work.

Yours sincerely



John Griffiths MS, Chair

Croesewir gohebiaeth yn Gymraeg neu Saesneg. We welcome correspondence in Welsh or English.