

Ymateb gan: Adra Tai Cyf. | Evidence From: Adra Tai Cyf.

Consultation Response: Building Safety (Wales) Bill

Date: September 2025

Senedd Cymru | Welsh Parliament

Y Pwyllgor Llywodraeth Leol a Thai | Local Government and Housing Committee

Bil Diogelwch Adeiladau (Cymru) | Building Safety (Wales) Bill

You do not need to answer every question, only those on which you wish to share information or have a view.

1. What are your views on the general principles of the Bill, and whether there is a need for legislation to deliver the stated policy intention?

Adra supports the overarching principles of the Building Safety (Wales) Bill. The Grenfell tragedy underscored the urgent need for a robust safety framework for multi-occupancy buildings. We agree that legislation is necessary to deliver the stated policy intention of improving safety, accountability, and transparency. The Bill's emphasis on resident safety, clear responsibilities, and proactive risk management aligns with our commitment to providing safe homes.

2. What are your views on the provisions set out in Part 1 of the Bill – Safety of buildings containing two or more residential units (sections 1 -66 and Schedule 1)? In particular, are the provisions workable and will they deliver the stated policy intention?

The provisions in Part 1 are broadly workable and reflect a proportionate approach to risk. The categorisation of buildings (Category 1 and 2) is helpful, though we suggest further refinement to include occupancy type and vulnerability (e.g., older residents or those with physical disabilities) as risk factors. The requirement for a Principal Accountable Person (PAP), the Golden Thread of information, and mandatory registration are welcome but will require significant operational changes. While Adra's walk-up flats fall under Category 3 and are not subject to registration, we anticipate operational impacts from the broader duties introduced by the Bill — including maintaining safety records, designating accountable persons, and ensuring compliance with fire safety and resident engagement requirements.

3. What are your views on the provisions set out in Part 2 of the Bill – Fire safety in certain houses in multiple occupation (sections 67 – 80)? In particular, are the provisions workable and will they deliver the stated policy intention?

Adra welcome the clarity provided in defining relevant HMOs and the requirement for written fire risk assessments. These provisions are workable and will help standardise safety practices across the sector. However, the inclusion of fire safety duties in tenancy

agreements should be explored to ensure enforceability and consistency. Recording assessments within the Golden Thread will support transparency and accountability.

4. What are your views on the provisions set out in Part 3 of the Bill – Enforcement and investigatory powers (sections 81 – 97 and Schedule 2)? In particular, are the provisions workable and will they deliver the stated policy intention?

The enforcement provisions are necessary and well-conceived, but their effectiveness depends on adequate resourcing. Local authorities, including Gwynedd Council (which regulates 90% of Adra's stock), face workforce and capacity challenges. Without sufficient funding and training, enforcement could be inconsistent or delayed. We support the Bill's intent but urge the Welsh Government to address these capacity gaps to ensure successful implementation.

5. What are your views on the provisions set out in Part 4 of the Bill – Supplementary and general (sections 98 – 114 and Schedules 3-4)? In particular, are the provisions workable and will they deliver the stated policy intention?

The phased implementation is appropriate and mirrors similar approaches in England. However, timely development of accompanying regulations is critical. Delays in drafting these could hinder sector readiness. Adra recommends early engagement with housing providers during the regulation development phase to ensure practicality and clarity.

6. What are the potential barriers to the implementation of the Bill's provisions and how does the Bill take account of them?

Key barriers include:

- Skills shortages in fire safety and building assessment roles.
- Capacity constraints within local authorities and housing associations.
- Financial pressures due to increased compliance obligations.

The Bill partially acknowledges these challenges, but further action is needed. Investment in training, apprenticeships, and digital systems is essential. Adra anticipates needing additional compliance staff and system upgrades to meet new requirements.

7. How appropriate are the powers in the Bill for Welsh Ministers to make subordinate legislation, as set out in Chapter 5 of Part 1 of the Explanatory Memorandum)?

The powers granted to Welsh Ministers are appropriate and necessary to ensure flexibility in responding to emerging safety needs. However, transparency and consultation during the regulation-making process will be vital to maintain sector confidence and ensure practical implementation.

8. Are there any unintended consequences likely to arise from the Bill?

A potential unintended consequence is the strain on local authority resources, which could delay housing development and compliance processing. This is particularly concerning given the housing emergency in Wales. Some authorities may be disproportionately affected due to the distribution of high-rise buildings.

9. What are your views on the Welsh Government's assessment of the financial implications of the Bill, as set out in Part 2 of the Explanatory Memorandum?

The financial assessment in the Explanatory Memorandum appears to underestimate the cost of implementation, particularly for housing associations. Adra expects significant costs related to:

- Additional fire risk assessments.
- Staff recruitment and training.
- IT system upgrades for Golden Thread compliance.

We urge the Welsh Government to include housing association costs in future financial impact assessments and provide targeted funding to support implementation.

10. Are there any other issues you would like to raise about the Bill and the Explanatory Memorandum or any related matters?

Adra supports a whole-system approach to housing adequacy, with building safety as a core component. The Bill should be viewed through the lens of the right to adequate housing, ensuring long-term investment and policy alignment. Collaboration between housing providers, local authorities, and the Welsh Government will be key to successful delivery.