

P-04-489 National affordable and priority housing Act of Wales – Correspondence from the petitioner to the clerking team, 30.09.13

It's taken Wales around 2000 years to have the 1.3 million houses it currently has. The Welsh Government proposes that their projections of 320,000 new houses for Wales, with no thought given to existing local priority or average wage to house price ratio, is taken up by all local authorities in the next 20 years, meaning a 25% increase in the house stock of Wales in 20 years. No mention is given to what jobs there will be for the up to 1 million new dwellers that will fill these houses or how the already struggling Welsh public service infrastructure and economy is supposed to accommodate a 33% increase in the population of Wales in such a short time. The Welsh public get no say and most of our representatives in the Senedd seemingly see this as completely normal.

It is strongly proposed that the National Assembly for Wales puts an end to this flawed process of LDP 'population projections' that are in reality no more than an estimate of how many people might be persuaded to move to an area from 'England and Wales'. It can't be right that housing associations are also locked into this flawed 'England and Wales' projections model. The Welsh Government and our democratic representatives are elected to serve the needs and interests of Welsh citizens first and foremost, as is their remit under Welsh devolution and housing within that settlement.

There are many areas of the country in which local authority citizens are clearly disadvantaged. This is why, in order to remedy this problem, the Welsh Government should introduce fair, proportionate priority legislation for Welsh citizens when it comes to the majority of new house builds. It is therefore proposed that a Housing Act of Wales is necessary in order to regulate the building of new houses in Wales in accordance with sustainable, realistic projections of population growth and future demand from within the existing population of Wales, whilst also taking in Wales' needs and capabilities to absorb populations from outside our borders that is within our economic and social services means. This should be regulated by an exclusive independent Welsh Inspectorate and Welsh housing projections panel and not an England and Wales panel designated as National Statistics by the UK Statistics Authority as the Minister for Housing and Regeneration Carl Sargeant refers to in his reply on the 10th of July 2013.

Your attention should also be drawn to the fact that the 2003-based national and sub-national household projections for Wales were bizarrely compiled by Anglia Ruskin University on behalf of the Welsh Assembly Government. This work was being carried out as part of the wider project of compiling sub-national household projections for England, on behalf of the Office of the Deputy Prime Minister (ODPM). This is a ridiculous situation and goes against the whole purpose of the devolution settlement. It also reiterates the obvious need for the establishment of an exclusive independent Welsh Inspectorate and Welsh housing projections panel to determine new Welsh housing stock based on existing Welsh need and not England and Wales needs as has been the case so far.

This lapse may have been understandable in the constitutional arrangement that existed before devolution, but now that we have a Welsh Government, and with that Government having devolved powers, and more importantly, responsibilities over housing, it is no longer

acceptable. The Welsh Government has been democratically elected to serve the needs and interests of Welsh citizens. If it does not, then for what purpose does it exist? And when – as in housing there are clearly many areas of the country in which Welsh citizens are being disadvantaged and Welsh communities damaged, then it becomes the duty of that Welsh Government and to introduce legislation to remedy these problems.

A proposed 5 - 10 year priority rule should not be as draconian as might be feared and would not include persons crossing the border to take up employment opportunities in Wales, key workers, students, business creators, companies, the self employed, vulnerable people or asylum seekers, as already catered for under UK law.

As a related Welsh housing/accommodation matter, in the 2009 report entitled *'The effects of recent migration on local authorities: allocation of housing and actions under homelessness legislation - a study in six local authorities - Executive summary'* commissioned by the Welsh Government, all stakeholders interviewed across the relevant six Welsh counties agreed that six months was too short a time to determine a local connection for homeless housing. Because of the relatively large private rented sector and holiday lets it was suggested that it was easy for someone to move in to the area and when the accommodation was no longer available, to claim themselves homeless and claim a local connection. In this case it was felt that a minimum residence of 12 months should be the bare minimum local connection before claiming homelessness. Personally I believe this should also be raised to at least 5 years as long as the relevant elements of the above mentioned exceptions are catered for.

This report also states that many elected members questioned felt that housing associations gave priority to assisting inward migration by accommodating greater numbers of people from outside the area rather than concentrating on local citizens as should be their remit. The impact of recent migrants for social housing was also claimed to prevent local people from accessing social housing and also had an averse impact on Welsh language and culture, and had brought a disproportionate impact and change to rural communities. The Welsh Government has a duty to rectify this.

While the plans themselves were drawn up by the relevant local authorities, these bodies insist they were left no alternative because bureaucratic UK wide projections diktats ordered them to provide for new homes in numbers greatly exceeding any predicted local demand. LDP's are based on flawed 'population projections' that are in reality no more than an estimate of how many people might be persuaded to move to an area and are based on England and Wales projections rather than existing Welsh based projections. There is a growing belief that, in many parts of Wales, all forms of housing provision are unrelated to the needs of existing Welsh citizens : even dismissive of, or openly hostile towards, those needs.

It also needs to be re instated that Wales is one of the small nations of the world and deserves to be protected economically as well as socially in terms of its distinct identity and culture. An influx of the size proposed by the LDP's would have disproportionate effects on such a small country in both these areas. Since the people of Wales have not been permitted a debate on this issue at Senedd level and our AM's currently do not seem that bothered, the people of

Wales will have no choice but to consider legal and international human rights action unless the Welsh Government starts doing what it was elected to do.

It is also worth reminding the Welsh Government, Assembly members as well as local authorities, that under the Local Government Act 2000, councils have been charged with “promoting the social, economic and environmental well being of their area and producing community strategies which contribute to the achievement of sustainable development in the UK”. This should include impacts beyond the local area as well as making sure local people and communities are engaged in the process of decision making through participative systems of governance. As the Welsh government has apparently adopted sustainable development as its central organising principle it is oxymoronic that their housing projections seem to be the most unsustainable plans possible for the future of Wales and seem to run against the fundamental points outlined in the local government act concerning sustainable development. It should be very much hoped that this is currently an unfortunate oversight on behalf of the Welsh Government and that it can be quickly and sensibly rectified.

Below are the disproportionate housing projections commissioned and published by the Welsh Government for all the local authorities of Wales and which are bizarrely based on England and Wales projections. These unsustainable projections should be discontinued in favour of a sustainable Welsh based projections system as outlined in Welsh devolution responsibilities.

Projected housing increase Wales: 2008 - 2033
Welsh Government figures

Local Authority area	Households 2008	Projected household increase 2033
Anglesey	30,621	5,206
Gwynedd	51,865	8,397
Conway	50,651	9,233
Denbighshire	43,137	12,162
Flintshire	64,108	10,513
Wrexham	57,157	15,536
Powys	59,019	15,572
Ceredigion	32,808	6,670
Pembrokeshire	52,091	12,319
Cardiganshire	80,280	26,547
Swansea	100,545	29,380
Neath Port Talbot	60,077	15,837
Bridgend	58,183	16,541
The Vale of Glamorgan	52,818	14,861
Cardiff	136,741	70,743
Rhondda Cynon Taf	99,109	16,272
Merthyr Tydfil	23,932	3,589
Caerphilly	73,998	14,563
Blaenau Gwent	30,679	5,522
Torfaen	38,838	2,812
Monmouthshire	38,090	7,782
Newport	59,960	11,111

Total housing increase for Wales between 2008 – 2033 – **331,168**

Projected population increase in Wales between 2008 – 2033, **794,803**