

HB 64

National Assembly for Wales
Communities, Equality and Local Government Committee
Housing (Wales) Bill: Stage 1
Response from: Gruffydd Meredith

I would first like to point out that the premise for this Housing Bill is sadly flawed. Recent findings have uncovered that the Welsh Government's projections for new households are utterly inconsistent with the population projections. The Welsh Government's projected figures for new households for 2008-2033 period is 323,009, which would mean an increased population of 684,779 if using an average number of 2.12 persons per household taken from the mid period 2020. See link here:

<https://statswales.wales.gov.uk/Catalogue/Housing/Households/Projections/National/2008-Based/Households-by-Type-Year>

But the Welsh Government/Office of National Statistics project that the population rise of Wales between a similar 25 year period of 2012-2037 will only be approximately 247,000 people meaning that the number of new households actually needed, using an average of 2.12 persons per household, is 116,509 new households (x 3% Department for Communities and Local Government household growth methodology) meaning a total of 120,004 new households. See link here: <https://statswales.wales.gov.uk/Catalogue/Population-and-Migration/Population/Projections/National/2012-Based/PopulationProjections-by-Year-Gender>

By this estimation the Welsh Government have over projected the need for new households for Wales for the 2008-2033 period by at least 203,005 new households.

It has also recently become apparent that the Welsh Government have very little if any say in deciding housing policy in Wales, with policy being decided on an England and Wales basis from mostly London departments rather than under the independent charge of the Welsh Government as it should be under the devolution settlement and the Government of Wales Act 2006. The population projections are produced by the Office of National Statistics, and attributed as such in the StatsWales figures. However it now seems that the Office of National Statistics "sources out" household projections to the Department for Communities and Local Government in London. In the StatsWales metadata the household projections are attributed to the Knowledge and Analytical Services. The Planning Inspectorate and the Knowledge and Analytical Services unit are both part of the Department for Communities and Local Government in London. This strongly demonstrates that these bodies producing the household projections for Wales, and therefore pushing through the LDPs and the resulting social housing issues, both answer to London and not to the Welsh Government or to Wales. If this is true then the Government of Wales Act 2006 has been broken and the present Welsh Government is not acting in the interests of Wales as is its remit.

The Welsh Government has failed to explain how their StatsWales figures explain show an absurd and massive disparity between the Office of National Statistics' population projections and household projections.

It has also come to light that the Welsh Government/Stats Wales/ONS/ household projection

figures do not in any way correspond with the actual 2011 household census figures as can be seen in the corresponding links

here:<https://stats.wales.gov.uk/Catalogue/Housing/Households/Projections/National/2008-Based/Households-by-Type-Year>

This 2011 census link contradicts the above

here:<http://www.ons.gov.uk/ons/search/index.html?newquery=ons+2011+census%3A+number+of+households+with+at+least+one+usual+resident%2Cunitary+authorities+in+Wales>

The 2008 household projections show 1,335,911 households in Wales by 2011; however the 2011 census showed there to be only 1,302,700 households in Wales, showing that the Welsh Government has over estimated the number of new households by 33,211 new households for this 4 year period alone. This again blatantly shows that the Welsh Government household projections are flawed overall. This also raises the question of why these official household numbers projections haven't been revised in the past 2 years.

This all highlights the numerous calls for a specific, transparent and democratically accountable Welsh planning inspectorate and projections research unit as a completely independent body for Wales, working hand in hand with local authorities and with the communities involved, who should also be able to appeal decisions

As previously quoted from a Welsh Government 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", it was also stated that many elected members questioned for the report 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, had an adverse impact on Welsh language and culture, and had brought a disproportionate impact and change to rural communities.

The Welsh Government has a duty and responsibility to rectify this by insisting that local need and economic sustainability must come first and that there is also a Welsh language impact assessment of all new housing developments. The current Sustainability bill white paper and its sustainable communities agenda developments goes against its own remit by ignoring these fundamental issues and responsibilities.

Along the same lines, it should be restated that under the Local Government Act 2000, the Welsh Government, Assembly members as well as local authorities have been given the responsibility of "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". These current LDP housing projections and Housing bill simply don't do that and are not based on sustainable community planning and a coherent national vision. A moratorium should also be put in place in view of these flawed projections.

This could be changed by a National Housing Act of Wales that provided the framework and policy for a genuinely worthwhile housing strategy, and which took in to consideration jobs availability and the economy of Wales as well as other important sustainability matters such

the rights and vitality of the Welsh language in Wales. An effective Act would also allow local authorities to scrap the current LDP plans and replace them with their own formulated, annually reviewed plans where necessary, based on local need and working alongside local community groups.

These inaccurate household projections would cause an over supply of new homes and a massive imbalance in the resulting social housing sector. Building a mass surplus of unnecessary new homes with the wishful aim of filling them all at some point in the future, with no thought given to Welsh needs and the sustainability of the Welsh economy and our communities is sheer irresponsibility and needs to be addressed by all our elected representatives.

Lastly I propose that this Housing Bill cannot justifiably be implemented in view of the Welsh Governments failed projections in general. It should be noted that the current non LDP housing plans are adequate enough for the needs of sustainable growth within Wales and that the proposed LDP projections are exponential, misguided and not fit for purpose. This Housing bill should be scrapped and the Welsh Assembly should instead introduce a National Priority and Affordable and Housing Act of Wales Bill as is being considered in this Welsh Assembly petition:

<http://www.senedd.assemblywales.org/mgIssueHistoryHome.aspx?IId=6796> which would guarantee that the vast majority of new homes have a 5-10 year local authority priority clause and/or business/wealth creator/employee priority clause like they operate in the Peak district and North York Moors in England, and that the majority of new households are also built and priced proportionally to average local authority wages. An Act such as this would also mean that a far more sustainable number of new households would need to be built in Wales. This is crucial considering that Wales has no control over currency or other crucial economic levers. Local authorities should work with local community groups and decide new home numbers annually, which should be based on sustainable actual local need and local infrastructure capabilities.

The Welsh Government should follow their own policy of sustainability which should take in to consideration the capability of Welsh infrastructure, public services and availability of new jobs in line with new homes and the impact of large housing developments on the cohesiveness of all communities in Wales, and in order to avoid a detrimental impact on the Welsh language as a spoken community language. As is now being discussed by the UK government, a 5 - 10 year priority rule would be reasonable for new normal and social housing (other than extreme urgent situations that suddenly arise) but would not affect persons crossing the border to take up employment opportunities in Wales, key workers, students, business creators and companies, the self employed or asylum seekers, as already catered for under UK law. This would not have to apply to existing homes in Wales.

Sincerely,

Gruffydd Meredith