

LG 21

Bil Llywodraeth Leol ac Etholiadau (Cymru) Local

Government and Elections (Wales) Bill Ymateb gan:

Sefydliad Siartredig Tai Cymru

Response from: Chartered Institute of Housing Cymru

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**Chartered
Institute of
Housing**
Cymru

Local Government and Elections (Wales) Bill

CIH Cymru consultation response

The Chartered Institute of Housing (CIH) is the independent voice for housing and the home of professional standards. Our goal is simple – to provide housing professionals with the advice, support and knowledge they need to be brilliant. CIH is a registered charity and not-for-profit organisation. This means that the money we make is put back into the organisation and funds the activities we carry out to support the housing sector. We have a diverse membership of people who work in both the public and private sectors, in 20 countries on five continents across the world. Further information is available at: www.cih.org

In Wales, we aim to provide a professional and impartial voice for housing across all sectors to emphasise the particular context of housing in Wales and to work with organisations to identify housing solutions.

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General Comments

CIH Cymru welcomes the opportunity to provide information to the Equality Local Government and Communities Committee as it undertakes its consultation on the Local Government and Elections (Wales) Bill.

Our response is informed by feedback from our members, our knowledge of the housing industry and expertise from our policy and practice teams.

CIH Cymru supports the development of Welsh policies, practices and legislation that aim to address the key housing challenges we face, to improve standards and supply, promote community cohesion, tackle poverty and promote equality. We promote a *one housing system* approach that:

- places the delivery of additional affordable housing at the top of national, regional and local strategies as a primary method of tackling the housing crisis;
- secures investment to ensure the high and sustainable quality of all homes in a sustainable framework;
- improves standards and develops the consumer voice within the private rented sector
- promotes the concept of housing led regeneration to capture the added value that housing brings in terms of economic, social and environmental outcomes;
- recognises that meeting the housing needs of our communities is a key aspect of tackling inequality and poverty;
- ensures that that there are properly resourced support services in place to prevent homelessness and protect the most vulnerable;
- uses current and potential legislative and financial powers to intervene in housing markets and benefit schemes;
- promotes consumer rights & tenant involvement;
- and supports the continued professional development of housing practitioners.

1. Introduction

- 1.1 Local government is an integral part of the staff, service and infrastructure system that both deliver social and affordable housing directly and enhance the wellbeing of citizens living within communities across Wales. Local authorities in every part of Wales play leading roles in reducing homelessness, providing housing-related support services and enable planning to boost the supply of affordable and accessible housing locally.
- 1.2 The importance of any changes to improve and enhance collaboration between and within authorities cannot be underplayed for those housing professionals working at an operational level. Our response therefore reflects on how the proposed changes within the bill could impact how those professionals and services operate.
- 1.3 We remain supportive and optimistic that extending voting right to 16- and 17-year olds will broaden the base of younger people becoming aware of societal challenges, such as access and provision of truly affordable housing and further enable them to play an active role in helping to bring forward solutions locally.

2. Collaborative working by principal councils (Part 5)

- 2.1 We welcome the proposals to establish corporate joint committees at the instigation of Ministers or two principal councils, although believe the detail held in regulations for establishing these will be vital.
- 2.2 Whilst we agree with the proposed areas upon which Ministers could instigate corporate joint committees, the housing function within local authorities is likely to be impacted upon in some form by most of the areas named. Economic development, strategic land use and transport have a clear link with the current and future supply of affordable housing. The Welsh Government's Independent Review of Affordable Housing Supply in Wales also reflected heavily on these areas with tangible recommendations that should be taken into consideration by and through the work of corporate joint committees.
- 2.3 For example, the review reflects and draws recommendations to:
 - Improve the consistency and granularity of the housing need data collected and used by local authorities.
 - Further develop a national approach to Off-Site Manufacturing underpinned by capital investment and use of local supply chains and skills to maximise impact on local economies.
 - Plan the use of public land to deliver value for money to the public through a coordinated approach (exploring the formation of a land agency to strategically plan the use of public land).
- 2.4 These are just some aspect of the review's recommendations which could be aided through the establishment of corporate joint committee's if they fall directly or are linked to the topics under focus. It is key however that these committee's do no duplicate or complicate the current collaborative arrangements driven through both Public Service Boards and Regional Partnership Boards.

- 2.5 Whilst it may not be for regulations to specify how to take such considerations forward, we would hope that through monitoring arrangements an understanding of how the affordable housing review recommendations are considered through appropriate corporate joint committees can be established.

3. Performance and governance of principal councils (Part 6)

- 3.1 We welcome a clear focus on improving service performance and a consistent approach to measuring progress underpinned by collaboration across regulators. From a housing perspective there are real opportunities to drive change in how people's housing needs are met.
- 3.2 One area where we believe the performance measurement regime could further progress is through working toward and implementing a right to adequate housing. We have welcomed the support from the Welsh Government to date in exploring this option. The Minister emphasised that commitment during her statement in Plenary on 19 November, when she introduced the Local Government & Elections (Wales) Bill into the National Assembly for Wales:

"We will be putting that due regard right into the statutory guidance and local authorities will have to abide by it, just for the avoidance of doubt."

- 3.3 We welcome the Minister's statements on incorporation of the "Due Regard" element into the statutory guidance accompanying this part of the Bill. However, along with colleagues at Tai Pawb and Shelter Cymru, we believe that the Due Regard duty would be given more weight by inclusion on the face of the Bill.
- 3.4 We have submitted a separate piece of evidence on this particular issue in a joint submission to the committee with Tai Pawb and Shelter Cymru.

4. Mergers and restructuring of principal areas (Part 7)

- 4.1 The bill makes provision for voluntary mergers between principal authorities. Messages that came out of our research on local government mergers and their potential impact on housing departments from the perspective of those staff working in housing services in 2018 remain relevant in the context of this discussion.
- 4.2 A key theme which emerged from the Tyfu Tai Cymru research ["Weighing the options"](#) was that staff often felt unaware of the implication merger could have on their own department/role. Some staff felt that merger discussions did not involve officers with the expertise to inform how things could be shaped and work differently in the context of merger. This uncertainty, it was felt, was often damaging to staff morale and unhelpful to planning a long-term approach to delivering services.
- 4.3 We believe a key feature common to any process undertaken should be the existence of a comprehensive communication and engagement plan to ensure staff feel empowered and fully informed of any changes and have a clear voice in raising concerns or highlighting opportunities for positive changes.

- 4.4 The same should apply to transition arrangements where a clear voice for the authorities' housing function should be common-place across interim arrangements.

5. Barriers to implementation of the Bill's provisions

- 5.1 With many of our members working within local authorities we know that the operating environment for those supporting housing functions can be highly challenging. With a local authorities' duties spanning homelessness prevention to enabling the delivery of more affordable homes it is vital to value and consider further how to support housing professionals and their colleagues in maintaining a high level of service.
- 5.2 We believe that there may be challenges in ensuring consistency in the quality of progress and outcomes achieved through corporate joint committees. We can see inconsistency within a housing context in how tackling empty properties is resourced, if and how housing is given priority corporately and the quality of data linked to planning homes held by each authority respectively. Whilst there is positive work taking place to address such issues it seems that the success of corporate joint committees could hinge on:
- **The expertise available.** Seniority of responsible officers for housing differs across authorities, depending on the scope of housing activities retained by an authority. Nonetheless we believe housing expertise is a vital part of the mix required in considering economic development, strategic land use and transportation.
 - **Evidence and data.** Whilst we are aware of challenges in gaining consistent and high-quality data to inform decision-making, this should be a priority across authorities to ensure staff can operate effectively across these groups.
 - **Timely collaboration.** With some local authorities exploring how to re-establish a programme of council house building it seems that this area is ripe for collaboration between and across authorities and their housing association partners.