

## The Right to Adequate Housing - CHC Sector Response

### About Us

Community Housing Cymru (CHC) is the voice of housing associations in Wales. We represent and support 36 housing associations and community mutuals. Our members provide almost 165,000 homes to 10% of the Welsh population.

### Our Response

#### 1. Examine how incorporating the right to adequate housing into Welsh Law would work in practise

CHC believes wholly in the right to adequate housing. We have a vision that Wales is a place where good housing is a basic right for all. However we know that making this vision a reality requires the resources and tools to deliver it.

We are unclear how a proposed right to adequate housing in itself would expedite progress, and consider that any work on this right needs to be grounded in an understanding of the resources and tools that would facilitate this. We recommend that this work is done as a priority to inform any consideration of legislative change.

When determining the need for legislative change, we should first consider the nature of the challenge facing us and consider which tools are most appropriate to drive the desired outcomes. This should include interrogation of potential unintended consequences of legislative proposals.

#### 2. Identify any challenges and barriers to taking this policy forward

Below we outline the challenges and barriers to implementing this policy as reported by our members. Where possible, we also identify potential routes to overcome these barriers.

We consider that efforts to overcome existing barriers to accessing adequate housing, including providing affordable homes at the pace and scale required, preventing and responding to homelessness, and decarbonising our housing stock must be prioritised.

- **Development and supply chain issues**

The Welsh Government has a substantial programme of work with partners to tackle the drivers of the housing crisis in Wales. However despite record investment in social homes in recent years, demand for affordable homes continues to far outstrip supply with estimates showing that between 2019 and 2024 Wales needs an additional 3,500 affordable homes per year.<sup>1</sup>

---

<sup>1</sup> [Estimates of Housing Need 2019 based, Welsh government](#)



Housing associations and partner organisations are experiencing substantial barriers to developing new homes. In order to deliver the high quality, safe, warm build the homes the people and communities of Wales need, we must work to remedy the major challenges affecting the housing and planning sector.

We need a planning system which has enabling environmentally responsible developments at its heart. In order to achieve this we need a bespoke troubleshooting service which has the resources and powers to step in and find solutions to problems that are habitually causing costly, unnecessary delays to development. This service must have the power to bring stakeholders together and negotiate pragmatic approaches to moving development forward. We need a swift but realistic plan with achievable milestones for reviews of the planning system, in particular in relation to sustainable drainage systems (SUDs) and TAN15. We need a holistic Welsh strategy and aligned decision making across Welsh government departments to avoid policy making in one area that creates problems in another. We must also prioritise getting the right people in the right places at the right time for the system to work - for example, providing funding to local authorities to create posts that have strategic oversight for the delivery of affordable housing developments and exploring regional pooling of planning and development staff with relevant specialisms.

- **Homelessness pressures and lack of revenue funding**

There are significant pressures on homelessness and housing support services. There are currently over 8,500 people in temporary accommodation with this figure rising approximately 500 people every month<sup>2</sup>. Many of these people will require support to help them move on to settled accommodation. Against this picture of rising demand, Housing Support Grant (HSG) funding has been maintained at 2022/23 levels and has not risen in line with inflation, leaving services in an increasingly precarious position.

Our 'Housing Matters' campaign, delivered in partnership with Cymorth Cymru, highlights that once inflation has been accounted for HSG is worth £18m less today than supported people funding allocations were in 2011/12. This decrease in funding is coupled with a rapid increase in running costs as accommodation-based services are particularly vulnerable to volatile energy bills.

Services are finding it incredibly difficult to recruit and retain staff - a major factor is the lack of funding to pay for decent wages, training and support for staff who are doing extremely skilled, complex and traumatic jobs. Some are currently paid below the Real Living Wage, yet no additional funding is being made available to services.

Housing associations are committed to playing their part in ending homelessness and ensuring Everyone in Wales has access to suitable housing but significant revenue funding is needed, alongside work to increase the supply of affordable homes, in order to ensure people can access the right support and the right property.

- **Decarbonisation**

Making swift progress on reducing the carbon emissions of our homes is a hugely important step in tackling climate change and addressing the cost of living crisis by saving people money on bills. We

---

<sup>2</sup> [Housing Matters Campaign 2022, Cymorth Cymru and Community Housing Cymru](#)



know that housing emissions make up 10% of total emissions in Wales. Developing and retrofitting homes that use renewable energy, are well insulated, and are efficient will ensure occupiers can save money on energy bills and lower maintenance costs. This is particularly important during the cost of living crisis as it means vulnerable people will have increased protection from fluctuations in energy prices.

However at present, we have no clear long-term route map to decarbonising our housing stock. Modelling sourced by CHC demonstrates that achieving EPC A by 2033 for housing associations in Wales alone will cost at least £2.05bn and this estimate is likely to be a conservative figure. Barriers to progressing the decarbonisation agenda include; a lack of necessary infrastructure required to deliver retrofit ambitions at pace, absence of a skilled workforce who can provide specialist trades and services and an increasingly more volatile climate that is vulnerable to extreme weather events such as flooding.

The following conditions must be in place in order to make expedited progress on decarbonisation: an ambitious but achievable target date, a long term funding programme, a complementary skills strategy and space and time to learn and implement effective tenant engagement strategies.

We must acknowledge the cumulative pressures being experienced by housing associations across all areas of service delivery and how this may impact upon the right of adequate housing to be realised. As outlined in our introduction, we must think carefully about whether legislative measures are the right tool to address the barriers outlined above and rather, other levers like increased funding or fostering new cultures are more appropriate to avoid unintended consequences.

### **3. Consider the impact a right to adequate housing would make across Wales**

Everyone in Wales deserves somewhere safe, comfortable and secure to live. Somewhere that is adaptable to our changing needs, connected to where we work, or where we are educated and somewhere where public services are accessible. The pandemic highlighted how important it was to have somewhere safe to call home. The benefits of a good home for everyone are multiple.

- **A healthier, happier population**

We know that investment in good quality homes means that people can be healthier and can live independently in their own homes for longer. This is better for individuals and families and also saves public money by relieving pressures on the NHS and other public services.

We understand the UK's ageing population is likely to place strain on the NHS and the public purse over the next few decades with a predicted rise of 63% in the number of people over 65 admitted to hospital for a fall<sup>3</sup>. On top of this, a Housing LIN study estimates that for each person living in housing with care settings, the NHS saves approximately £2,000 per year, per person. We can prevent hospital admission by improving access to accessible and adapted housing. With proper, long-term, sufficient investment in housing and support, we can greatly decrease the strain on the NHS and improve the day to day lives of individuals living throughout Wales.

- **A more prosperous Welsh economy**

---

<sup>3</sup> [Population Projections Platform - Data Cymru and Usk Scientific Services on behalf of Social Care Wales, 2018](#)



Investment in housing greatly boosts the Welsh economy. At present, housing associations employ around 11,000 full time equivalent jobs and this rises to around 27,000 if indirect sources of employment are also considered.<sup>4</sup> On top of this, housing associations spend 90p of every £1 earned locally in Wales and over the course of five years, starting in 2021, are predicted to provide a £6bn economic boost to communities up and down Wales.<sup>5</sup>

**For further information please contact:**

Bethany Howells

Policy and External Affairs Officer

Community Housing Cymru

---

<sup>4</sup> [Global Accounts, the financial statement of Welsh housing associations 2021, Community Housing Cymru](#)

<sup>5</sup> [Home Manifesto, Community Housing Cymru, 2021](#)