

Welsh Government - Housing White Paper

Consultation Response from the Vale of Glamorgan Council

Do you support our ambition to make further improvements to the whole housing system?

This is a well thought through and ambitious white paper which is welcomed by the Vale of Glamorgan Council. The additional duties and responsibilities for local authorities have noble aims behind them and will ensure greater focus is given to the strategic housing function of the authority.

The paper places emphasis on local authorities to deliver these ambitions; however the additional functions and responsibilities do not have any additional funding or resources attached to them, without which the local authority may struggle to deliver the Welsh Governments agenda in a meaningful way.

Do you have any comments on the proposals for legislation and/or the issues being considered for legislation:

a) To improve the private rented sector, including landlords, lettings agents and managing agents.

The Vale of Glamorgan Council welcomes the proposals for an accreditation and licensing scheme. However the local authority is concerned in relation to the availability of resources, both in terms of staff and funding, to effectively operate the scheme, including the aspects of enforcement.

The proposals should also recognise that private renting will not be the answer to many vulnerable people and that there are significant risks of many low paid, part time working tenants falling into poverty.

Private renting will never completely fill the void left by the lack of social housing, until the rents are affordable (for example, in the rural Vale a 3 bed terraced house can rent for £995 p.c.m.) and long term security on tenure ensured. We consider that a family in a privately rented home paying an unaffordable rent are in significant housing need. They have no long term security, a greatly reduced disposable income and no prospect of saving a deposit to qualify for a mortgage.

The issues associated with the private rented sector as a long term housing solution can only be resolved by regulation.

b) To prevent homelessness and to end family homelessness by 2019.

A concern for the Vale of Glamorgan Council is the added responsibility of providing temporary accommodation for those who are considered not to be 'safe'. The county has a limited supply of temporary accommodation that is currently used to capacity. With the additional people that would inevitably need to be accommodated, where would this extra temporary accommodation come from? Planning for this type of accommodation poses its own problems, including planning, local opposition and

funding. Without Welsh Government support to fund and provide additional temporary accommodation this would be difficult to achieve in a cost effective and person centred way.

The paper suggests a housing solutions approach expecting councils to start prevention work with households and individuals considerably earlier than we currently do (currently 28 days, white paper suggest increasing this to 56 days before due to become homeless) and putting in a suite of solutions for each client. This promotes an early prevention approach which is welcomed. Work is already undertaken by the Vale of Glamorgan Council on a non statutory basis; trying to prevent where possible and providing options. However, will the change also lead to advocacy agencies deciding that the council has a duty to provide temporary accommodation for longer, such as the 56 days? This will considerably increase the local authorities spend on temporary accommodation.

We are supportive of the intention to discharge homelessness duty into the private rented sector without explicit consent, as is the current case, but there should be stronger emphasis on suitable, affordable and good quality accommodation. There needs to be a mechanism to regulate and monitor landlords and their properties. However it is also recognised that in doing so this will create an additional administrative burden for the council and also put off some landlords from continuing to invest in the sector.

It is unclear how removing intentionality for families will lead to an end of family homelessness; there is not an explicit link. How will families that are clearly intentional (for example, hugely anti social in private rented so evicted) be supported and accommodated in an effective and cost efficient way? For those re-allocated a tenancy, who continue to be anti social; what is the point of housing officers evicting them in the first place? For some households this will create a cycle of eviction, homelessness and re-housing and does not provide an incentive for personal responsibility.

Expecting more partnership working is positive. However, existing housing plans already state that we work in partnership and how this is facilitated. How will this intention actually improve practice without monitoring or expected standards being documented?

The nationally branded locally delivered housing advice service - where does this sit with the local authority statutory services and complimentary advice and support services that are already delivered. This could be viewed as a duplication of existing services. Additionally where will the funding for this service come from? Would it not be more effective to promote a more consistent range of advice services delivered by the local authority?

The suggested review of Section 180 funding is welcomed and the local authority would be keen to be involved in such a review. It is essential that the services being funded are still meeting the needs of the local area, are strategically relevant and continue to be a priority. We would argue that all grant funding, including section 180, should be handed to local authorities to administer and commission services that would meet local need and provide additional preventative services.

There is a distinct lack of timescales in the action plan – such as the review of whether prisoners as priority need is working.

c) To provide local authorities with a discretionary power to levy a higher rate of council tax on long-term empty properties.

The proposal to provide local authorities with a discretionary power to levy a higher rate of council tax on long-term empty properties is welcomed. The Vale of Glamorgan Council would advocate that this discretionary power is also made available in relation to second homes.

d) A statutory duty on local authorities to provide sites for Gypsy and Traveller communities.

Given the geography of Wales as a small country, there are some circumstances where a regional approach to the provision of sites for Gypsy and Traveller communities would be most appropriate. Therefore, any legislation developed in this regard should reflect this.

There should also be additional support made available to local authorities needing to plan and develop a traveller site. Strategic support is required to overcome the public objection to sites and the planning issues associated.

e) Defining Community Land Trusts

f) Enabling a new co-operative housing tenure to aid developments.

The Vale of Glamorgan Council supports the work planned for a number of pioneer projects around the development of co-operative housing models.

We are actively promoting a cooperative housing scheme in the Vale of Glamorgan but feel we need to remind the Welsh Government that affordable housing, of any tenure, requires subsidy. Cooperative housing cannot be set up without some level of funding or land being made available at a discounted rate.

g) Requiring local authorities to produce and regularly update Local Housing Market Assessments.

The Vale of Glamorgan Council agrees that regular updates of Local Housing Market Assessments (LHMAs) should be encouraged to ensure housing need information is accurate, up to date and fit for purpose. We have welcomed the recent guidance on conducting in-house LHMAs and updates; this will increase the skill set of current staff and provide a cost effective way of providing housing market updates.

However, we also take the view that there is a significant amount of activity already around the production and updating of LHMAs, therefore, it is not necessary to legislate on this matter.

The idea of a “Champion for Housing” in each council is excellent, however it could also be viewed as unnecessary, given that each local authority already has a Cabinet Member in place with responsibilities in relation to housing. The Welsh Government needs to be clearer on the role of this champion and its purpose in order to effectively plan how to ensure each local authority fulfils this role.

h) Tenancy reform to improve the way the housing system works for housing organisations, landlords and tenants alike.

The Vale of Glamorgan Council supports the overall approach of simplification of tenancy types currently being examined by a working group, and looks forward to further consultation on the detail of any emerging proposals. We would welcome the opportunity to be involved in work undertaken to progress this area of improvement.

i) Setting standards for local authority rents, service charges and quality of accommodation to support the Welsh Housing Quality Standard.

There is a lack of clarity and detail around these proposals. Further detail is required to allow proper consideration. The council would support the AWCHOP suggestion that this should be taken forward as part of the arrangements for developing a framework for local authority landlords in the context of dismantling the current HRA Subsidy System.

The review of HRAS and the greater financial freedom and flexibilities suggested in the section on rents will help with HRA service development. But certainly a lot of the reforms are based around improving housing supply, the private rented sector, and homelessness—which are all general fund services.

j) A duty of co-operation on housing associations and possibly other organisations to improve further the joint working on housing matters that does exist in some areas.

The Vale of Glamorgan Council supports the proposal to introduce a duty of co-operation on Housing Associations.

The Council would also like to suggest that consideration be given to extending any duty of this kind to include Health and Probation colleagues.

Do you have any comments on any other action set out in this White Paper?

Housing Supply – given the emphasis on new housing in the paper and the ambitious targets for new build properties and the number of empty homes the Welsh Government expects to be brought back into use, there is critically no additional resource.

The target for 7,500 new affordable homes, of which 500 will be co-operative homes, is unachievable without the funding being available to provide subsidy for the building of affordable housing.

The target to bring back 5,000 empty properties into use is unachievable, without the financial and staffing resources being made available to carry out a proactive service to support owners to bring properties' back into use or carry out enforcement work where needed.

Intermediate rented properties are continuing to be encouraged, as they allow RSLs to develop without grant subsidy. However this tenure will not meet all housing need.

In the Vale of Glamorgan we have a relatively low need for intermediate rent and a high need for social rented accommodation. This is also exacerbated in rural areas where rent at market levels is increasingly unaffordable. This tenure may cause a poverty trap for some households; in cases where the property is only affordable whilst in receipt of Housing Benefit. This is a disincentive to gain employment and reduce welfare dependency.

We welcome the suggestions for the regeneration of town centres and the potential to convert empty commercial premises and land to provide more homes.

4. 47 Release Public Land is a simple phrase that hides a myriad of complications: identifying the land, convincing the owners of the overall benefit to the community of housing, dealing with different departments expectations for cash receipts, unwillingness of owning departments to comply with WG instructions (especially if they are national not Welsh institutions) and finally location.

Therefore it is questionable whether it is achievable to build 500 new homes on surplus public sector sites.

4.85 Under-occupancy is not necessarily an evil. A core of established residents who have brought up their family is essential to the sustainability of a community.

The Vale of Glamorgan does not have a significant supply of small (1 and 2 bed) units of accommodation; therefore enabling households to downsize is going to cause some difficulty. Additionally, the Vale of Glamorgan does not have a significant supply of shared accommodation; again this will create problems when trying to identify suitable alternative accommodation for single people under 35. This in turn will increase rent arrears and homelessness.

4.101 Space standards – The council appreciates the problems faced when attempting to increase the space standards required of the private sector. However it does not make sense to have different standards for private and social housing. Either the standards should be relaxed for social housing (which would allow RSLs to purchase units off the shelf, restart stalled sites, purchase and increased percentage of units on a site in the case of the private market faltering) or the standards for the private sector be improved to match those of the social sector.

5.36 Aids and adaptations – The recommendation for all local authorities to develop an accessible homes register is welcomed. The Vale of Glamorgan Council already has this register in place and it proves to be a successful method to ensure residents are able to access suitable accommodation to meet their needs.

7.54 Young people – There are two obstacles to helping children get a good start in life caused by housing; poverty caused by high private sector rents and the upheaval caused by the need for constant moving when renting privately.

7.71 Anti social behaviour - There is an unfortunate emphasis on blaming tenants for all ASB. This impression is partially corrected in paragraph 7.75 but the overall effect is to portray social tenants as bad and owners and private tenants as good.