

# White Paper: Creating a pathway towards adequate housing including fair rents and affordability

## Consultation response form

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## Consultation questions

**Q1:** If seven housing adequacy factors were used in Wales to monitor housing adequacy, what indicators might be appropriate to evaluate each of the seven housing adequacy factors? (The seven factors are listed below and each factor is discussed in more detail earlier in Chapter 2. Use these headings and indicate under each heading the indicator or indicators that you believe may be appropriate to use.)

Security of tenure

Availability of services, materials, facilities and infrastructure

Affordability

Occupancy

Accessibility

Location

Cultural adequacy

One of the ambitions of the Welsh Government's *Cymraeg 2050* strategy (the Government) is to protect the sustainability of communities where the Welsh language is a natural community language. An important part of doing that is enabling and facilitating Welsh speakers to continue living in these communities. Of course, improving the adequacy of housing for local people within the strongholds of the Welsh language would help support this aim.

In its report, [Empowering Communities, strengthening the Welsh Language](#), the Commission for Welsh-speaking Communities (the Commission) recommended that the Welsh Government legislates to give official status to areas in Wales where there is a high density of Welsh speakers. According to the Commission, this would enable the development of better public policies in areas such as housing, as it would be possible to tailor policies in accordance with the unique needs of specific areas. We are supportive of the recommendation, but we can also see that a strong evidence base would need to be developed to enable that to happen. The indicators for evaluating the housing adequacy factors could

contribute to developing this evidence base. Below are the housing adequacy factors that we consider relevant to the sustainability of Welsh-speaking communities, as well as some considerations about the Welsh language that should be addressed when developing indicators:

**Security of tenure** – The white paper recognises that some areas have a large number of second homes, short-term holiday lets and long-term empty properties, which pose challenges for the communities within them. Furthermore, the white paper states that these issues can also affect the prosperity of the Welsh language as a community language, and we agree with that. If letting a house for short-term letting is more beneficial for private landlords, then it is likely that situations will arise where private renters are evicted from houses in order to change the status of the houses to short-term letting. Of course, the changes to the Article 4 Directive mean that planning authorities now have powers to control the extent to which that happens. We believe that indicators attached to evaluating security of tenure should show how many second homes, short-term holiday lets and long-term vacant properties there are in any given LSOA area. Furthermore, indicators should also show the number of requests to change housing status within the LSOA area, as well as how many of the requests have been successful. The indicators should enable the analysis of the density of second homes, short-term holiday lets and long-term vacant properties in specific areas, thereby providing a picture of where this could be problematic for the local community.

**Availability of services, materials, facilities and infrastructure** – The white paper suggests that indicators will be developed to show the distance between houses and schools as part of forming a picture of housing adequacy. The language category of schools should be a part of this data, and the availability of Welsh education should be a part of considering the adequacy of housing. In its *Cymraeg 2050 strategy*, the Welsh Government set a target for increasing the proportion of learners in Welsh medium education to 40% by 2050. Facilitating children's access to Welsh language education will be essential to reaching this target. We believe that the relationship between the location of quality affordable housing and Welsh medium schools is important in that context. The data could be useful when considering the Government's progress with its Welsh education targets, and in turn, that should feed into decisions on housing and school developments in the future.

**Location** – The criteria for location state that housing is not sufficient if it is isolated from work opportunities, health care services, schools, child care centres and other social facilities. The results of the 2021 Census showed that the population of areas where the Welsh language is at its strongest is aging at a higher rate than other areas, with a high number of the working age population moving from those areas. We assume that the factors listed above all have an impact on the viability of these communities, affecting migration in and out of them. It is reasonable to conclude that the lack of job opportunities and the shortcomings of the economy in these areas contribute to young people choosing to leave in order to try to improve their chances in life.

Investment is needed for these communities in order to make them attractive places to live for the working age population. We therefore welcome efforts to develop indicators that would give us a better understanding of the criteria listed above. A better understanding of the situation could help us to understand

what types of investment and interventions are needed in order to prevent the patterns of depopulation from repeating themselves.

**Affordability** – The integrated impact assessment recognises that there are challenges associated with housing affordability in communities where the Welsh language is used naturally on a day-to-day basis. If we are serious about strengthening the viability of these communities, it will be essential to ensure that housing is affordable for the population there. To do that it will be necessary to invest in interventions, such as the pilot scheme in Dwyfor, and to do so on a wider level. We will need indicators that enable us to show the extent to which housing is affordable in areas in order to continuously review the impact that interventions have, and to be able to respond if levels of affordability worsen. It will be necessary to be able to see the size of the gap between local incomes and house price ratios. In order to enable interventions that respond to local needs, the indicators should report on the situation at the micro level, e.g. the Commission for Welsh-speaking Communities has based their statistical work on LSOA level.

**Cultural adequacy** – The white paper states that the Housing Scheme in Welsh-speaking Communities addresses the challenges faced by Welsh-speaking communities where there are a large number of second homes. This is an example of one of the measures in place in order to realise this criterion. We are supportive of the plan and the effort to understand the housing needs of communities at the local level, as well as the obstacles that prevent meeting the needs. Our comments under the above criteria explain the indicators we believe need to be prioritised regarding the Welsh language and linguistic planning.

**Q2:** If indicators are developed to measure housing adequacy in Wales, should they apply in the same way throughout Wales or should they include some regional or local variation?

- They should - they should be implemented consistently across Wales
- **No, they shouldn't – the procedure should vary by region or local area**
- No Opinion
- Don't know

If so, how could this work in practice?

In its report, *Empowering Communities, strengthening the Welsh Language*, the Commission recommended that the Government legislate in order to give official status to areas in Wales where there is a high density of Welsh speakers. According to the Commission, this would enable the development of public policies regarding aspects such as housing, that are tailored to the unique needs of these areas. We are supportive of this recommendation but also recognise that an improved evidence base is needed to set public policy that supports the Welsh language within these communities. Although it is likely that there will be a number of indicators that would be relevant throughout Wales, we believe that some regional or local variation should be allowed. We can see a situation where specific indicators would be needed in areas of higher density linguistic significance.

An example of this would be the development of indicators regarding housing affordability within the Dwyfor Pilot area. It is possible that the Government would decide to expand the pilot to the rest of the areas of higher density linguistic significance, but not necessarily across the whole of Wales. It should therefore be possible to develop indicators that are unique to these areas to help tackle problems that affect the sustainability of the Welsh language there.

**Q3:** Should people living in a particular local authority area be able to get adequate housing in any area of their choice in that local authority?

- They should
- No, they shouldn't
- No Opinion
- Don't know

What is your opinion on this matter?

Protecting the sustainability of communities where there is a high density of Welsh speakers is important to protecting the viability of the Welsh language, and is an essential part of the Government's *Cymraeg 2050* strategy. An important part of ensuring the viability of Welsh speaking communities is to ensure that people who have grown up and lived in these areas can stay in their communities if they wish. Belonging to an area where there is a shortage of affordable housing should not mean that an individual needs to move to another area within the local authority to live. This problem is not unique to areas of higher density linguistic significance, of course, but our focus is on these areas because of their importance to the viability of the Welsh language.

It is difficult to define exactly what is meant by 'community' in this context and it can mean different things in different contexts (for example, an urban area compared to a rural area). But generally, we would recommend not adopting too broad an interpretation (for example, local authority level) or

too limited an interpretation (a specific and very small area). Therefore, to answer the question, we do not necessarily believe that someone who lives in a particular area in a local authority has the ability to obtain adequate housing in any area of their choice in that local authority. Despite this, we believe that people should be able to continue to live in more specific areas if they wish to do so. A reasonable interpretation of the meaning of community is required in this context, using this concept as one part of what is used in order to evaluate whether there is sufficient housing in certain areas.

The points above do not mean that there should not be mobility within areas where there is a high density of Welsh speakers. In its report, [\*Empowering Communities, strengthening the Welsh Language\*](#), the Commission for Welsh-speaking Communities notes the importance of the mobility of Welsh speakers within these areas. The Commission states "in the context of the local labour market, where there are a number of jobs where the Welsh language is needed and there has been trouble filling them, it is necessary to ensure that policies to prioritise local people do not have the unintended effect of hindering Welsh speakers from moving to these communities. Encouraging non-local Welsh speakers to settle for the first time in an area of higher density linguistic significance can be beneficial for the language." Of course, it is possible for anyone who decides to move to the Welsh-speaking heartland to learn the language, and that needs to be promoted. But it is also necessary to consider whether there is a need to develop policies in order to encourage and support Welsh speakers to move to areas of linguistic sensitivity where they have no local connection, but their presence would be valuable to the viability of the Welsh language there. This should be a consideration when developing a housing strategy in the future.

**Q4:** Should elements of the adequate housing framework apply to the owner-occupier sector?

- **They should**
- No, they shouldn't
- No Opinion
- Don't know

If so, how could this be made to work in practice and what issues need further consideration?

We are supportive of any efforts to increase our understanding of the housing situation in Wales, as that, in turn, could improve the linguistic planning process.

**Q5:** In your opinion, would the proposal to require Welsh Ministers to draw up a housing strategy help to stimulate progress towards ensuring that adequate housing is available to everyone in Wales?

- **Yes**

- No
- No effect
- Don't know
- No answer

Give your reasons.

We are supportive of the proposal to require the Welsh Ministers to draw up a housing strategy. This proposal is a clear improvement on the current arrangements and we agree that the introduction of such a strategy will likely result in stimulating progress towards ensuring that adequate housing is available to everyone in Wales, and a programme of work that will be planned and delivered more strategically.

Regarding the Welsh language in particular, the strategy will offer a clear opportunity to analyse the extent of housing supply within areas of higher density linguistic significance. In addition, drawing up the strategy would be an opportunity to plan in accordance with the Government's targets and vision for the Welsh language, and we would expect to see specific requirements in this context in the act to ensure that the strategy will consider the Welsh language.

**Q6:** Should Welsh Ministers be required to use seven housing adequacy factors when drafting the strategy?

- **Yes**
- No
- Don't know
- No answer

Give your reasons

We are supportive of the proposal to require Welsh Ministers to use seven housing adequacy factors when drafting the strategy. We consider that the majority of the factors are relevant in different ways to the sustainability of Welsh-speaking communities (our response to question 1 details how). Having to consider the seven factors as part of a housing strategy would be a clear opportunity to plan in accordance with the Government's targets and vision for the Welsh language.

**Q7:** How often should Welsh Ministers be required to review the strategy?

- Every year
- Every 2-3 years
- **Every 4-5 years**
- There should be no such requirement

- Don't know
- No opinion

Give your reasons.

The review of the strategy should coincide with assessments of the local housing market, which occur every five years. The assessments of the local housing market are a key part of evidence in the preparation of Local Housing Strategies, Local Development Plans, and the Social Housing Grant Prospectus. We believe that they would also act as important evidence for the housing strategy reviews, as well. It would therefore make sense for the reviews to take place after the assessments of the local housing market have been published.

Recommendation 26 in the Commission for Welsh-speaking Communities' report, [Empowering Communities, strengthening the Welsh Language](#), says that local authorities should ensure that all plans in the Social Housing Prospectus include evidence of local housing needs. According to the Commission, a community assessment of housing needs should be carried out every five years per community council or town council area, and that the process should be led by the Rural Housing Facilitators. We are supportive of this recommendation, and this activity should also feed into the national housing strategy, and its reviews.

In addition, [5-year strategies to promote the Welsh language](#) that county councils and national parks are required to prepare could be relevant to consider alongside reviewing the strategy. The promotion strategies explain how these organisations intend to promote the Welsh language and to facilitate the wider use of the Welsh language in their area.

**Q8:** How often should Welsh Ministers be required to report to the Senedd on the progress that has been made in delivering the strategy?

- Every year
- **Every 2-3 years**
- Every 4-5 years
- There should be no such requirement
- Don't know
- No opinion

Give your reasons.

Reporting to the Senedd on the progress that has been made in terms of achieving the strategy every 2-3 years would go hand in hand with the timetable for reviewing the assessments of the local housing market. See our answer to question 7 for more context.

**Q9:** Do you agree that rental data should be collected locally by Rent Smart Wales (e.g. ward or postcode)?

- Yes

Why?

We favour a system that enables decisions about local housing needs to be made at the local level, which responds to local needs, rather than just professing regional or national policies. Collecting data at the local level would facilitate that.

**Q10:** Apart from those already stated, are there any other principles or objectives that should be considered when developing how rent information should be provided to Rent Smart Wales?

**Q11:** Do you believe that creating spatial maps from aggregate rent data is useful and that these maps should be published?

- **Yes**
- No
- Don't know

Why?

We believe that drawing up spatial maps would enable better access to combined rent data, and that could facilitate linguistic planners within the Government and its partners to act across all its policy areas to support the achievement of its strategy, *Cymraeg 2050*.

**Q12:** Do you believe there should be a mechanism to challenge rent increases?

- **Yes**
- No
- Don't know

Why?

The white paper recognises that there are areas where there is a high density of Welsh speakers and where developments in tourism have increased the number of short-term holiday lets in what used to be residential properties. We believe there is a risk that such situations could reduce the availability of private sector rental housing and raise the rent premium in an unequal manner. In order to protect against that, it should be possible to challenge such progress, with an expert and independent body judging what is fair.



**Q13:** Do you believe licensees should be required to complete an Annual Property Condition Record?

- **Yes**
- No
- Don't know

Why?

**Q14:** In your opinion, what information should be included in the Annual Property Condition Record? For example, should rent data be collected by the Annual Property Condition Record?

We are supportive of any efforts to increase our understanding of the housing situation in Wales because, in turn, it would improve linguistic planning in areas of higher density linguistic significance. We are supportive of including rent data in the Annual Property Condition Record, because it could increase our understanding of housing affordability within areas of higher density linguistic significance.

**Q15:** Are there any other groups of people not identified in the eligibility criteria that should be considered? Please note any groups not identified in the proposed eligibility criteria.

**Q16:** Do you believe that permitted payments would help people with pets to access the Private Rented Sector?

- Yes
- No
- **Don't know**

Why?

**Q17:** Do you foresee any positive or negative effects that would result from this proposal?

- Yes
- No
- **Don't know**

Why?

**Q18:** Do you believe that the proposed criteria for reimbursing the higher residential rates aspect of the Land Transactions Tax from the tax levied would give an incentive to landlords and increase access to affordable homes in the Private Rented Sector?

- Yes
- No
- **Don't know**

Why?

**Q19:** What period of time between the purchase of the dwelling and the registration of the main lease with the local authority should be provided in order to be eligible for a refund?

**Q20:** Do you foresee any positive or negative effects that would result from this proposal?

**Q21:** Do you have any further evidence or comments that you would like to provide?

**Q22:** What, in your opinion, would be the likely effects of an exempt activities order as proposed in this consultation on the Welsh language? We are particularly

interested in any likely impacts on opportunities to use the Welsh language and on not treating the Welsh language less favourably than the English language.

- Do you believe there are opportunities to promote any positive effects?
- Do you believe there are opportunities to mitigate any adverse effects?

Our response to the consultation questions summarises the effects we believe that the proposals would have on the Welsh language, and we encourage you to read them in full. To summarise briefly, stabilising communities where the Welsh language is used naturally day-to-day is an important part of the Welsh Government's *Cymraeg 2050* strategy. A key part of this aspect of *Cymraeg 2050* is enabling and facilitating Welsh speakers to continue living in these communities, and that includes providing adequate housing for the local population. We support the idea to develop a housing strategy based on the seven housing adequacy factors, because the majority of them are relevant to the Welsh language. The strategy would offer us opportunities to improve our understanding of the housing situation of Welsh communities, and enable us to tailor interventions and measure their effectiveness. Beyond areas where there is a high density of Welsh speakers, we believe there are opportunities to show the relationship between adequate housing and access to Welsh language education.

**Q23:** In your opinion, could an exempt activities order be drawn up or changed in order to:

- have positive effects or more positive effects on the use of the Welsh language and on not treating the Welsh language less favourably than the English language; or
- mitigate any negative effects on the use of the Welsh language and on not treating the Welsh language less favourably than English?

See our response to question 22.

**Q24:** We have asked a number of specific questions. If you would like to comment on other issues that we have not specifically addressed above, please use this space to report them:

It is likely that responses to consultations will be published, either on the internet or in a report. Tick here if you would prefer your response to be anonymous:

