

Welsh Government White Paper on securing a path towards Adequate Housing, including Fair Rents and Affordability

Crisis response: January 2025



About Crisis

Crisis is the national charity for people facing homelessness across Wales, Scotland and England. We know that homelessness is not inevitable, and we know that together, we can end it.

We provide services directly to people experiencing homelessness, carry out research into the causes and consequences of homelessness, and campaign for the changes needed to end it.

Our South Wales Skylight provides direct one-to-one support to people who are at risk of or experiencing homelessness in Swansea, Neath or Port Talbot. We help our members find safe and affordable homes and support with accessing benefits, healthcare services and employment opportunities. We also offer a range of learning, social and wellbeing opportunities.

Our Wales Policy team works closely with Members of the Senedd from all parties, contributes to working groups and advisory groups, responds to consultations and calls for evidence, and connects with policy teams in other organisations in Wales.

Our Best Practice team works with local authorities, third sector partners, businesses and other organisations on a range of homelessness projects across Great Britain to identify, test and promote ways of ending homelessness.

We are passionate about working collaboratively across the sector to seek positive policy solutions to help end homelessness in Wales.

About this response

This response has been written by our Wales Policy team, with input from Crisis members who have recent lived experience of homelessness.

About homelessness

Homelessness is much more than 'rooflessness' or lack of physical shelter, it is the lack of a home. That is why it is important for us to emphasise that achieving housing adequacy must be seen as more than ensuring people just have a place to stay or a roof over their head – the adequacy of housing must be understood as universal access to a safe and settled home.

A safe and settled home is the foundation on which people can build a decent life and meet their true potential. Having a decent home is vital for good health and wellbeing and makes it easier for us to succeed at work and in education, to maintain relationships with our family and friends and to contribute to our community. Making sure that everyone has a safe and affordable home benefits us all.

The chronic undersupply of housing in Wales (and across Great Britain) means that many people are currently living without an adequate home. The most recent Welsh Government statistics show that homelessness is rising. Last year, local authorities recorded 13,539 homeless households - an increase of 8% on the previous year.

The combination of issues including the cost-of-living crisis, rising rent costs, wage stagnation and the insufficiency of housing benefit is particularly devastating for people on lower incomes, who have fewer and fewer options because the homes that are available to them are either unaffordable, difficult to access, or very poor quality. There is therefore an urgent need to unlock access to more homes that provide security, decent living conditions and manageable rents.¹

We believe that the delivery of the Welsh Government's Ending Homelessness Action Plan, particularly the upcoming Ending Homelessness Bill and efforts to build more affordable housing in line with the housing needs of those experiencing homelessness, are the principal mechanisms needed to enable everyone in Wales to access a safe and settled home. It is critical that we look to take homelessness prevention upstream, ensure that support is available to those who need it and plug the gaps in our supply of affordable housing to meet need.

It is also vital to secure investment in housing and homelessness services to enable local authorities to work efficiently towards the goal.

The right to adequate housing

We consider that the incorporation of the right to adequate housing into Welsh legislation would complement the above critical measures. We consider it would assist in ensuring the perpetuity of this transformational programme of work and bring new dimensions of accountability. It would also be consistent with the Welsh Government's approach to incorporating other human rights into Welsh law (for example, the rights of the child).

For these reasons Crisis has been supportive of calls from the sector to incorporate housing as a human right into domestic law. We would welcome further discussions between the Welsh Government and the wider sector on how this right could be effectively incorporated.

White Paper questions: Crisis responses

1. If the seven factors of adequate housing were used in Wales to monitor housing adequacy, what indicators could be appropriate to evaluate each of the seven factors of housing adequacy? (The seven factors are listed below and a more detailed discussion of each factor is set out earlier in Chapter 2. Please use these as headings and set out under each heading the indicator or indicators you believe may be appropriate to use)

The seven factors of housing adequacy are central to ending homelessness and creating a future where everyone in Wales has an adequate home.

¹ Crisis (2023) [Home is where the start is: the case for ending homelessness with homes](#)

Before commenting on indicators for each of the seven factors individually, we will comment on key points that apply to all seven factors of adequacy.

Firstly, it will be essential that indicators connect with the indicators being used as part of the Ending Homelessness Outcomes Framework – we know that a lack of these adequacy factors leads to homelessness, so homelessness data should be a general indicator.

Secondly, we know that some factors of adequate housing cannot be assessed through quantitative data alone, and for that reason, we would support the introduction of a national household conditions survey, as detailed in the Senedd Local Government and Housing Committee's recent report on the Private Rented Sector.² We are aware that a business case on options for delivering this survey is currently being prepared and would encourage the Welsh Government to ensure that data collected as part of such a survey forms a key part of indicators used to assess housing adequacy across all tenure types, complementing the data collected on the PRS via the proposed Annual Property Condition Records.

Thirdly, although we have consulted Crisis members who have experience of homelessness as part of the process of writing this response, we do feel that there should be more targeted consultation work done with people who have experienced homelessness and people with protected characteristics. This will be important to ensure that people who typically face the most barriers to accessing adequate housing can express how they feel adequacy of housing could be assessed.

In addition, it will also be important to ensure that as policies develop around housing adequacy, this is reflected within processes for supply planning. Finally, as well as establishing indicators, it is important to consider how often and by whom these indicators would be assessed and monitored, with adequate reflection on how any regulation and enforcement would be funded and resourced. This consideration must include assessment of data gaps that need to be filled to provide a comprehensive picture of the current landscape before developing a mechanism for tracking progress.

It should also be established that the indicators are reviewed periodically to take account of the inevitable evolution of the socio-political-economic context and the progressive realisation principle. As well as being done periodically, a review could also be triggered by significant economic events, for example, changes to the benefits system or a sudden spike in inflation.

Security of tenure

Indicators Crisis believes should be considered in this area include but are not limited to:

- Evictions and repossessions data
- Awareness of rights amongst renters (potentially captured through a housing survey)
- Number of people presenting as homeless because of eviction

² Senedd Local Government and Housing Committee (2024) [Private Rented Sector](#)

- Number of people applying for the Help to Stay programme

Availability of services, materials, facilities and infrastructure

This area could include consideration of the following:

- Energy supply coverage within residential areas
- Availability of energy efficient materials
- Availability and affordability of energy-saving and efficient infrastructure such as solar panels
- Proximity to amenities

Affordability

As we highlighted in our Green Paper response, there are limitations to all established mechanisms of affordability assessment and expert understanding of the detailed context is vital to accurate and meaningful assessment.

Whilst 30% price-to-income ratio is a commonly used affordability threshold, the 30% figure is largely arbitrary and for low-income households, spending 10% or 20% of income on housing costs might mean that they are unable to cover other essential costs.³

With this in mind, Crisis suggests that the Welsh Government commissions further specialist research to inform the development of a mechanism which would measure affordability more meaningfully within the Welsh housing context. Crisis suggests that this measure should consider the following components:

- **Specification of which 'housing costs' are included in calculations**

This should include 'total' housing costs, including rent, utility costs, mortgage interest payments, structural insurance premiums (for owner occupiers), and service charges. Consideration should also be given to whether maintenance costs of the property should be included, as well as upfront costs involved in accessing housing, such as tenancy deposits, first month's rent, removal costs and the costs of furniture/white goods.

- **An agreed minimum income standard for non-housing goods**

The Minimum Income Standard research provides for this.⁴

- **An agreed minimum standard for housing quality**

It is important to ensure that any measure of affordability does not allow for under-consumption of housing below a tolerable standard to be considered 'affordable'. Minimum standards of housing quality (including issues of overcrowding) should define a 'floor' below which consumption is considered unaffordable, by virtue of it being unacceptable. This should be linked back to all 7 factors of housing adequacy.

³ OECD (2021) ['Building for a better tomorrow: Policies to make housing more affordable'](#), *Employment, Labour and Social Affairs Policy Briefs*, OECD, Paris.

⁴ Padley, M., Marshall, L. and Valadez-Martinez, L. (2019) ['Defining and measuring housing affordability using the Minimum Income Standard'](#), *Housing Studies*, 34 (8) pp.1307-1329.

- **An agreed threshold or price above which housing costs are considered 'high'**

For example, Padley, Marshall and Valadez-Martinez (2019) define this for working households as more than the average proportion of net income taken up by housing costs for working households with below median income.

- **Equivalisation by household size and type**

The definitions of a) a minimum income standard for consumption of non-housing goods; b) minimum size which is considered adequate; c) household income; should all be equivalised by household size and type, using the OECD-modified equivalence scale (ONS, 2015).

- **Interactions with the benefits system**

Given that the benefits system is designed to provide support to cover housing costs for households in- and out-of-work, any measure of affordability must consider how income from benefits should be treated. As was concluded by the Affordable Housing Commission⁵ and others,⁶ in dealing with benefits, housing benefit should be factored into housing costs, subtracted from the expenditure side of the equation rather than added to the income side, and, where a household with no-one in work does not see their housing costs met by housing benefit/Local Housing Allowance (LHA), they can be assumed to be facing a problem of affordability.

- **Specification of which part of the distribution the measure is supposed to apply to**

The measure must be clear which section of the income distribution averages are derived from. Some researchers apply the ratio measure to only the bottom 40% of the distribution. Some have proposed weighting affordability ratios by income quintile;⁷ whereas others define 'high' housing costs with reference to the average paid by the bottom half of the distribution.⁸

- **Testing against indicators of financial stress and under-consumption of housing**

A measure should be tested against empirical data of households' experiences of financial stress, as has been done by, for example, Bramley (2012),⁹ the Affordable Housing Commission (2019)¹⁰, and Meen and Whitehead (2020)¹¹.

⁵ Affordable Housing Commission (2019) [Defining and measuring housing affordability – an alternative approach](#).

⁶ Padley, M., Marshall, L. and Valadez-Martinez, L. (2019) '[Defining and measuring housing affordability using the Minimum Income Standard](#)', *Housing Studies*, 34 (8) pp.1307-1329.

⁷ Meen, G. (2018) [How should housing affordability be measured?](#) UK Collaborative Centre for Housing Evidence.

⁸ Padley, M., Marshall, L. and Valadez-Martinez, L. (2019) '[Defining and measuring housing affordability using the Minimum Income Standard](#)', *Housing Studies*, 34 (8) pp.1307-1329.

⁹ Bramley, G. (2012) 'Affordability, poverty and housing need: Triangulating measures and standards', *Journal of Housing and the Built Environment*, 27 (2), pp.133–151.

¹⁰ Affordable Housing Commission (2019) '[Defining and measuring housing affordability using the Minimum Income Standard](#)', *Housing Studies*, 34 (8).

¹¹ Meen, G. and Whitehead, C. (2020a) 'Is Housing Really Unaffordable?' in G. Meen and C. Whitehead (eds.) *Understanding Affordability: The Economics of Housing Markets*. Bristol: Bristol University Press, pp.17-38.

Until this research has been conducted and a more sophisticated measure of affordability has been designed, indicators that Crisis believes should be considered in the interim include but are not limited to:

- Local Housing Allowance (LHA) rates, particularly whether it covers the bottom third of rents and the number of properties available to rent in each local authority that are affordable for people in receipt of Housing Benefit.
- Fuel poverty data
- Rate of rent rises in PRS and social housing, especially in comparison with wage growth/average income
- Rates of new social homes being built
- Number of people presenting as homeless because of being unable to afford to run their home
- Data on applications to mortgage rescue schemes, bond schemes, PRS access schemes, and Discretionary Housing Payments (DHPs)

Habitability

Indicators Crisis believes should be considered in this area include but are not limited to:

- Levels of compliance with Renting Homes Wales Act 2016 fitness for habitation standards
- Levels of compliance with Welsh Housing Quality Standards
- Levels of compliance with Housing Wales Act and upcoming Ending Homelessness legislation suitability standards
- Overcrowding statistics
- Number of people accessing healthcare because of poor housing conditions. This could include, for example, respiratory conditions caused or exacerbated by damp and mould, or mental ill-health due to unsatisfactory housing conditions.
- Data from annual property condition records proposed by the White Paper
- Housing survey responses in relation to whether or not people feel safe at home

Accessibility

Indicators Crisis believes should be considered in this area include but are not limited to:

- Number of accessible properties on an accessible housing register - we support the proposal in the Ending Homelessness White Paper that would legally require local authorities to hold an accessible housing register, as well as the Welsh Government's recent commitment to exploring how an accessible housing register could be introduced for the PRS.¹²
- Availability/affordability of adjustments and adaptations for disabilities within private and social housing
- Proportion of new housing meeting accessibility standards
- The length of time disabled people spend on social housing waiting lists
- The length of time people spend on supported housing waiting lists

¹² Welsh Government (2024). [Written response by the Welsh Government to the report of the Local Government and Housing Committee – Private Rented Sector](#)

- Availability of advice and advocacy services to support disabled people to live independently

Location

Indicators Crisis believes should be considered in this area include but are not limited to:

- Geographical distribution of different tenures
- Range of rental costs across a local authority area
- Average proximity of housing to public services including health, transport, leisure facilities, schools, etc.
- Average proximity of housing to green space
- A question in the national housing survey could be used to gauge how satisfied people are with the location of their housing

Cultural adequacy

Indicators Crisis believes should be considered in this area include but are not limited to:

- A question on cultural adequacy in a housing survey, and particularly data collected from respondents from minoritised communities
- Targeted consultation with minoritised communities on the adequacy of their housing
- Targeted consultation with Welsh-speaking communities and those seeking to live in Welsh-speaking communities
- Sites available for Gypsy, Roma and Travelling communities

2. If indicators are developed to measure housing adequacy in Wales, should they apply in the same way across Wales or should they feature a degree of regional or localised variation? If so, how might this work in practice?

If indicators are developed to measure housing adequacy in Wales, they should all apply across Wales. While consistency of standards is important, it will be relevant to be mindful of certain different geographical and cultural contexts – for example, while properties should always meet hazard standards, standards around proximity to amenities may look different in a rural area to an urban area.

We would be pleased to work with the Welsh Government to develop further thinking on how variation could be best applied.

3. Should people who live in a particular local authority area be able to access adequate housing in any locality of their choosing within that local authority? What are your views on this matter?

Crisis believes that it is important for people to have as much choice as possible when creating and settling into a home. This links to 'security of tenure', because if a person can choose the area in which they are to live, they are more likely to feel settled in that location.

Local authority areas in Wales are vast, and there is a significant amount of variation between localities within each local authority area. Therefore, there are many reasons as to why a person may need to reside in one specific locality within a local authority area but would be unable to live in another. These reasons could be related to, for example: proximity to public services, including transport, healthcare, medical facilities and education; caring responsibilities; employment contracts or opportunities; informal support networks.

Members of certain social groups may be particularly likely to need to live in a specific locality. For example, in order for a home to be culturally adequate, it may be important for people who practise religion to be able to access a place of worship, Welsh-speakers to be near to their Welsh-speaking community, or Gypsy, Roma and Travellers to live in a locality which offers an approved Gypsy, Roma and Travellers site.

Furthermore, survivors of domestic abuse or other abuse or exploitation may need to live within a particular locality to distance themselves from perpetrators or traumatic memories.

In a similar vein, it is important that perpetrators of abuse can access housing in a locality that will enable to distance themselves from survivors. The [Expert Review Panel](#) tasked with considering how legal reform could end homelessness in Wales heard from stakeholders representing survivors of domestic abuse that, where perpetrators cannot find appropriate housing, they are likely to return to the survivor and place pressure on them to take them back.¹³

Additionally, for some people leaving prison, returning to an area where they have a history of offending can increase their likelihood of re-offending, and it can be critical to their rehabilitation to seek a fresh start in a new area.

4. Should elements of the adequate housing framework apply to the owner-occupied sector (Yes/No/No views/Don't know)? If so, how might this be made to work in practice and what issues require further consideration?

The adequate housing framework should apply to all housing within Wales. Crisis would suggest that mortgage rescue schemes and fuel poverty support schemes would be beneficial to ensure the adequacy of owner-occupied housing.

5. In your view, would the proposal to require Welsh Ministers to produce a housing strategy help progress towards ensuring access to adequate housing for people in Wales? (Yes/No/Don't know). Please explain your reasoning.

Yes, Crisis believes the proposal to require Welsh Ministers to produce a housing strategy will help progress towards ensuring access to adequate housing

¹³ Expert Review Panel (2023) [Ending homelessness in Wales: a legislative review](#)

for people in Wales. The Office of the United Nations High Commissioner for Human Rights is clear that a strategy is imperative to the realisation of adequate housing.¹⁴

Such a strategy should be carefully monitored to track progress towards achieving adequate housing in Wales and enable the Senedd to hold the Welsh Government (and other public bodies and partners involved in delivering housing adequacy) to account.

We have seen how the Welsh Government's Ending Homelessness High Level Action Plan has helped to drive policy change in this area, and Crisis believes that a strategy on the progressive realisation of the right to adequate housing could work in a similar way and complement this work.

6. Should there be a requirement on Welsh Ministers to draw on the seven factors of housing adequacy when drafting the strategy? (Yes/No/Don't know). Please explain your reasoning.

Yes, Crisis believes that there should be a requirement on Welsh Ministers to draw on the seven factors of housing adequacy when drafting the strategy.

When emphasising that states should adopt a national housing strategy to realise the right to adequate housing, the UN Committee on Economic, Social and Cultural Rights (CESCR) outlines such strategies must reflect a "comprehensive understanding of the problems", include objectives "based upon the full recognition of, and respect for, the right to adequate housing" and set out measures that ensure "the fullest possible account is taken of the needs of the most disadvantaged."¹⁵

While not listing the seven factors, Crisis would suggest that drawing on the seven factors of housing adequacy would be essential to a strategy that aims to achieve this.

7. 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 views). Please explain your reasoning.

Crisis believes that the strategy should be reviewed at least every 2-3 years. This balances the acknowledgment that progressive realisation takes a significant amount of time with the need for regular review to check the strategy still fits within the evolving socio-politico-economic context.

It should also allow for two reviews within each Senedd term, which would facilitate the appropriate level of scrutiny of the strategy by the Senedd.

However, in assigning timeframes, the Welsh Government should also consider how this sits alongside other relevant developments such as timeframes for Local Development

¹⁴ Office of the United Nations High Commissioner for Human Rights. [The right to adequate housing.](#)

¹⁵ Office of the United Nations High Commissioner for Human Rights. [CESCR General Comment No. 4: The Right to Adequate Housing \(Art. 11 \(1\) of the Covenant\)](#)

Plans and Local Housing Market Assessment submissions, which should also reflect and connect to targets on adequate housing.

8. How often should Welsh Ministers be required to report on progress on delivery of the strategy to the Senedd (Welsh Parliament)? (Every year; Every 2-3 years; Every 4-5 years; There should be no such requirement; Don't know;). Please explain your reasoning.

Crisis believes that Welsh Ministers should be required to report on progress on delivery of the strategy to the Senedd every year. Whilst it is important to acknowledge that progressive realisation takes a significant amount of time and that impact may be limited within the timeframe of one year, it is crucial that the Senedd holds the Welsh Government to account on progress with the delivery of the strategy.

9. Do you agree rent data should be collected at a local level by Rent Smart Wales (e.g. ward or postcode)? (Yes/No/Don't Know- Why?)

Yes, Crisis is clear that rent data should be collected at a local level by Rent Smart Wales and that it should then be shared with Rent Officers.

Analysis by Crisis and Zoopla¹⁶, and the Bevan Foundation¹⁷ shows that limitations in rent officers' datasets is leading to unreliable estimates of the real cost of renting. As there is currently no legal requirement for private residential landlords to disclose to Rent Officers how much rent they charge, the UK Government is making decisions about Local Housing Allowance (LHA) levels without comprehensive or up-to-date information, with no assessment of the risk to people facing homelessness.

LHA rates are based on 'actual rents' rather than 'advertised rents'. However, collecting a snapshot of actual rents might fail to capture the rate at which average rents for new tenancies are rising, as existing tenants may be paying less rent than prospective new tenants. On the other side of the coin, advertised rents only include new tenancies and will not always reflect the actual rent level agreed, particularly in high demand areas where there is an increasing trend for tenants to bid over listed rents. It is therefore important to collect accurate data.

The rent information that landlords supply should include detail on rent paid by tenants and the proportion of rent being paid through LHA. This would help the DWP and HM Treasury to accurately assess LHA shortfalls and improve the value for money on investment by ensuring that spending is efficiently targeted. It would also improve the accuracy of inflationary measures themselves, contributing to the work of the Office for National Statistics.

Beyond the determination of LHA rates, this data should also be used to assess the possibility of introducing a system of rent regulation in Wales.

¹⁶ Crisis and Zoopla. (2022). [Falling short: Housing benefit and the rising cost of renting in England](#).

¹⁷ The Bevan Foundation. (2021). [Wales' housing crisis: the role of LHA](#).

Crisis has always been clear that we are not supportive of the introduction of hard rent controls, but rather would recommend that a carefully designed rent regulation system, tailored to the Welsh context. Such a system should be implemented to ensure that in-tenancy annual rent increases are limited in line with an inflationary measure.

In our Green Paper response, we highlighted the importance of improving data on rents in Wales before designing such a system, and this data would be a crucial part of this process.

10. Other than those already outlined, are there any other principles or objectives that should be considered in developing how rent information should be provided to RSW?

Crisis feels that the principles and objectives already outlined provide a strong foundation for the delivery of rent information to Rent Smart Wales.

11. Do you think spatial mapping of amalgamated rent data is useful and should be made publicly available? (Yes/No/Don't Know- Why?)

Yes, Crisis believes that spatial mapping of amalgamated rent data is useful and should be made publicly available.

This data would contribute to assessing progress towards achieving housing adequacy and developing policies around rent controls, as well as other policy interventions that could contribute to ending homelessness.

12. Do you think there should be a mechanism to challenge a rent increase? (Yes/No/Don't know- Why?)

Crisis strongly believes that a mechanism should be in place to allow contract holders to challenge rent increases – Crisis members gave overwhelmingly positive responses to this proposal. Such a mechanism is essential in protecting contract holders from unaffordable rent increases, which can often force individuals and families into homelessness. Ensuring tenants have the ability to contest unreasonable increases is a key step in promoting fair treatment within the PRS and safeguarding housing stability.

One Crisis member commented:

"Landlords need to increase rent accordingly with living costs but [it's] got to be suitable on both sides"

To be effective, this mechanism must be developed in close consultation with tenants in the PRS, including individuals with direct experience of in-tenancy rent increases. Their insights are invaluable in creating a system that is both practical and responsive to the challenges tenants face.

The mechanism should not depend on the financial means of tenants and should be accessible without the need for Legal Aid. Accessibility is crucial to ensuring that all tenants, regardless of their financial situation, can exercise their rights and seek fair treatment.

It is also vital that contract holders are fully aware of the existence of this mechanism and how it works. Education on tenants' rights must be a priority so that individuals are empowered to take action if necessary. Awareness campaigns and accessible, plain language resources can play a significant role in making this mechanism effective.

One Crisis member suggested that there should be a *“media campaign to push and educate people on knowing what’s available and where they stand”*.

Another member highlighted the importance of access to advocacy and support with the system.

Additionally, steps must be taken to ensure that using this mechanism does not jeopardise the tenant’s security of tenure. Efforts should focus on minimising any negative impact on the relationship between tenants and landlords. To address this, a mediation service could be introduced, fostering constructive dialogue and resolving disputes in a fair and balanced manner. This approach would help maintain positive landlord-tenant relationships while protecting tenants' rights.

13. Do you think license holders should be required to complete an Annual Property Condition Record? (Yes/No/Don't Know- Why?)

Many Crisis members live in extremely poor housing conditions. The most common unsatisfactory condition reported by members responding to our survey on the proposals within this White Paper was damp and black mould, which we know can cause serious health issues.

We believe that the Annual Property Condition Record would be a positive way of improving the data on the quality of the Private Rented Sector, and consequentially improving the quality of housing within the Private Rented Sector through monitoring and enforcement. However, it will be important to ensure that the detail of how these records will work and are verified is carefully considered.

Crisis would suggest that there is some element of collaboration between licence holder and contract holder in the creation and completion of the Annual Property Record. We would like to see both parties corroborating the other’s interpretation of how the conditions are being upheld. However, we are conscious that we would not like to create tension between licence holder and contract holder as part of this practice.

14. In your view, what information should be included in the Annual Property Condition Record? For example, should rent data be collected by the Annual Property Condition Record?

Crisis feels strongly that the Annual Property Condition Record should assess adequacy of rental properties beyond the realms of Renting Homes Act Fitness for Habitation Standards.

Whereas these standards focus on habitability in its most basic sense, we feel the conditions assessed by the Annual Property Condition Record should go beyond this and encompass conditions that mean the property is an environment in which a tenant can create and maintain a safe, secure, settled and comfortable home.

As one Crisis member commented:

"Standards shouldn't be based on the lowest standard possible."

In order to achieve this, we suggest that the Annual Property Record emulates the Welsh Housing Quality Standard. That's to say, private rental homes should:

- be in a good state of repair
- be safe and secure
- be affordable to heat and have minimal environmental impact
- be fitted with an up-to-date kitchen and utility area
- be fitted with an up-to-date bathroom
- be comfortable and promote wellbeing
- have a suitable garden/attractive outside space.

There may be some variation in what is needed to be included in each individual Annual Property Record, depending on whether a property is being rented furnished or unfurnished, for example. However, the elements above could be used as a guiding framework, and then the contents of the record underneath these headings could be mutually agreed by landlord and tenant at the start of a tenancy. Advice for both licence holders and contract holders on drafting a record and negotiating changes should be readily available.

Finally, Crisis believes that rent data could be collected through the property condition record because it would be useful to analyse the data to understand the correlation between property condition and rental cost. This should either then be shared with Rent Officers or be in addition to rent data being submitted to Rent Officers.

15. Are there any other groups of people who have not been identified in the eligibility criteria who should be considered? Please specify any groups who have not been identified in the proposed eligibility criteria.

The need for a guarantor is a huge barrier for people experiencing homelessness, who often do not have close connections or relations with enough capital to be a guarantor. We are therefore pleased that people experiencing homelessness have been identified in

the eligibility criteria. However, we would also suggest that this is extended to people at risk of homelessness, i.e., people owed a prevention duty, which would align with the direction of travel towards a public service approach to prevention of homelessness at the earliest stage possible.

16. Do you think permitted payments would support people with pets to access the PRS? (Yes/No/Don't know- Why?)

Crisis has concerns about the impact of this proposal on people who own a pet and are at risk of or experiencing homelessness.

We know that pets play an important role in improving their owners' physical and mental health and wellbeing. For some people experiencing homelessness, their pet has been a source of comfort and companionship during a traumatic chapter in their lives and leaving their pet behind can feel inconceivable.

One Crisis member slept in her car because she could not find any affordable accommodation that allowed her to keep her dog, who had been her only companion through a difficult period in her life.

Through our survey on the white paper proposals, other Crisis members have made the following comments about the benefits of keeping pets include:

"My pet has been with me through turbulent times and is my continuity and family"

"Pets are good for depression"

"Pets listen to you"

"Pets can be a lifeline"

Whilst we understand the premise of this proposal, we do have a number of significant concerns and questions about the idea.

Our main concern is that permitted payments would make the PRS even more inaccessible for people who have pets and are experiencing homelessness. Most PRS homes are already unaffordable for Crisis members, and adding further payments would only exacerbate this problem.

One Crisis member responding to our survey on the White Paper proposals suggested that this proposal *"feels like another payment to stress about"*.

Research from the University of Huddersfield shows that 76% of landlords renting to people with pets did not encounter any damage caused by pets in their rental properties and that tenants with pets cause less damage and stay longer than tenants that do not own a pet.¹⁸

¹⁸ Simcock, T. et al. (2024). [The financial impact of pet ownership in rental properties](#)

We therefore feel policy proposals would be better directed towards obliging landlords to accept requests for pets except in exceptional circumstances or where this would breach animal welfare policy.

To support this, it would be helpful to raise awareness amongst private landlords about the potential benefits of renting to people with pets, and the unlikelihood of pets causing more damage than a tenant without a pet, rather than increasing the burden on tenants.

If the permitted payments proposal were to go ahead, careful consideration would be required to help mitigate the significant risks posed to people experiencing homelessness with pets. For example, considerations might include, establishing a means for local authorities to support applicants who are experiencing homelessness to cover the payment, similar to how they may be able to support with the requirement for a rent guarantor. We would be keen to ensure the process for securing this support from a local authority was not overly bureaucratic, but accessible to those who need it.

Furthermore, we would suggest that best practice should be spreading the cost of this payment and adding it to monthly rental costs rather than requiring it to be paid as an up-front payment. The initial cost of renting, i.e., paying a deposit, is already a huge barrier for people on lower incomes, and we would encourage the Welsh Government to ensure these permitted payments do not exacerbate this factor of unaffordability.

Whilst we acknowledge the suggestion of limits to the amount that landlords could charge a potential tenant, we would welcome more information on how the limits to these payments would be set. It would be important to ensure that there is transparency around the amount that a landlord charges a tenant.

We also wonder how these limits would be monitored and if there will be a mechanism for a potential tenant to challenge the cost of the insurance – could it be challenged through the same or similar mechanism that a rent increase would be?

17. Do you anticipate any positive or negative impacts which would result from this proposal?

Crisis' main concern is that the impact of this policy would mean people with pets who can afford to pay for 'permitted payments' will gain access to the PRS, but people in the most severe poverty, i.e., those experiencing homelessness, will still face the same barriers – if not more.

Another concern is that landlords who would already let to pet owners without asking for payment may now decide to ask for permitted payments, which would bring about unnecessary financial pressure on people trying to rent with pets.

18. Do you think the proposed criteria for a refund of the Land Transaction Tax higher residential rates element of the tax charge would incentive landlords and increase access to affordable PRS homes? (Yes/No/Don't Know/Why?)

Crisis welcomes initiatives which seek to increase affordable PRS properties and participation in the Leasing Scheme Wales and would welcome further information on this proposal.

Q19. What period of time between the purchase of the dwelling and entering the headlease with the local authority should be provided to be eligible for a refund?

No response.

Q20. Do you anticipate any positive or negative impacts which would result from this proposal?

Crisis would hope that this proposal would have a clear positive impact on increasing the number of affordable homes available. It is important to assess how this proposal could best be implemented to achieve this aim.

Q21: Do you have any further evidence or observations you wish to provide?

Monitoring and enforcement

Critical to the success of all the proposals included in the White Paper and this response is robust monitoring and enforcement. Simply establishing standards or introducing legislation will not lead to meaningful improvements unless these measures are effectively enforced. For instance, while requiring landlords to maintain property records is a positive step, it is essential to consider what will happen if a landlord fails to submit the record, as well as the consequences when properties fail to meet the required standards. Without accountability, these initiatives risk having no real impact on the quality of housing.

Currently, enforcement of habitation standards and licensing requirements in the private rented sector is the responsibility of local authorities; however, we know that local authorities do not have the resources to dedicate sufficient time to this.

Crisis feels that this needs to be addressed as a matter of urgency. The Welsh Government should consider how this could be addressed. For example, it might consider whether the enforcement arm of Rent Smart Wales could be enhanced to assist with monitoring and enforcing the proposals within this White Paper to ensure that standards are upheld in the private rented sector.

Rent controls

In our Green Paper response, we, along with other organisations, highlighted the importance of improving data on rents in Wales to inform proposals for rent controls tailored to the Welsh context. We believe that rent regulation can play a key role in assisting housing affordability, so long as it is carefully considered and tailored to the

relevant context. Whilst we are pleased to see the Welsh Government commit to establishing more data in this area, we would welcome more detail on the actions that will follow once the data has been collected to further consider what action on rent controls would be feasible within the Wales context. While, of course, the exact course of action will be determined by the data, it would be useful to know the plans for analysis.

Crisis has always been clear that we are not supportive of the introduction of hard rent controls, but rather would recommend that a carefully designed rent regulation system is implemented to ensure that in-tenancy annual rent increases are limited in line with an inflationary measure. We recommend that wage growth is used as the basis for calculating the inflationary measure to help ensure that rent remains affordable relative to income.

Social housing allocations

It is widely acknowledged that the lack of social housing stock is a key barrier to access to adequate housing for people experiencing homelessness in Wales. This is compounded by the use of unfair allocation processes for the social housing that does exist.

The Expert Review Panel found that there is significant variation in allocations policies across Wales. Allocations policies which exclude people who have historic rent arrears, previous instances of unacceptable or anti-social behaviour, former offences create disproportionate barriers to accessing adequate housing for people with experience of homelessness.

Conclusion

In conclusion, Crisis welcomes the Welsh Government's commitment to advancing housing adequacy and addressing affordability within the private rented sector. We believe that some of the proposals included in this White Paper will contribute to this aim, complementing the positive impact of the proposals expected to be included within the upcoming Ending Homelessness Bill.

Crisis is particularly supportive of the proposal to support local authorities in offering guarantors to people who need to rent a property in the private sector but are unable to secure a UK guarantor.

However, we must reinforce that we are concerned about the 'permitted payments' proposal, which we believe risks exacerbating homelessness by making the PRS even less affordable for people who have pets and are experiencing homelessness.

We would also like to reiterate the need for the Welsh Government to make a more specific commitment to using rent data to inform further consideration of a rent regulation system in Wales.

We believe that robust enforcement of proposed measures, adequate resourcing for local authorities, and the effective involvement of Rent Smart Wales are essential to ensure that

the proposals within this White Paper lead to tangible improvements in housing quality, affordability, and accessibility.

Crisis would also suggest the Welsh Government has further discussions with the housing and homelessness sector on how the right to adequate housing might be further embedded into legislation.

We are committed to working collaboratively with the Welsh Government, local authorities, and stakeholders to refine these proposals and contribute to the shared goal of ending homelessness and ensuring that everyone in Wales has access to a safe, affordable, and adequate home.

Thank you for reading this response. For more information, please email Jasmine Harris, Senior Policy and Public Affairs Officer jasmine.harris@crisis.org.uk