

Securing a path towards adequate housing including fair rents and affordability

Welsh Government consultation

A response from Cymorth Cymru

15th September 2023

About Cymorth Cymru:

Cymorth Cymru is the representative body for providers of homelessness, housing and support services in Wales. We act as the voice of the sector, influencing the development and implementation of policy, legislation and practice that affects our members and the people they support.

Our members provide a wide range of services that support people to overcome tough times, rebuild their confidence and live independently in their own homes. This includes people experiencing or at risk of homelessness, young people and care leavers, older people, people fleeing violence against women, domestic abuse or sexual violence, people living with a learning disability, people experiencing mental health problems, people with substance misuse issues and many more.

We want to be part of a social movement that ends homelessness and creates a Wales where everyone can live safely and independently in their own homes and thrive in their communities. We are committed to working with people who use services, our members and partners to effect change. We believe that together, we can have a greater impact on people's lives.

Website: www.cymorthcymru.org.uk

Twitter: [@CymorthCymru](https://twitter.com/CymorthCymru)

Contact: policy@cymorthcymru.org.uk

1. Do you think that the 7 factors of adequacy are something to aspire to achieving in Wales? If so, what mechanism or combination of mechanisms do you think are required to achieve the 7 factors of housing adequacy in Wales?

- 1.1 We want everyone in Wales to have a safe, secure, good quality home and we fully support the development of policy and legislation to make this a reality.
- 1.2 We support the 'Back the Bill' campaign for the full incorporation of the Right to Adequate Housing as per UN guidance (1948 Universal Declaration of Human Rights and 1966 International Covenant on Economic, Social and Cultural Rights). As the UK has ratified both treaties, we believe that the Welsh Government should work towards incorporating the Right to Adequate Housing and the seven factors into legislation.
- 1.3 While people have different views on what constitutes adequacy for them and their families, we agree that the seven criteria outlined by the United Nations is a sensible framework to define housing adequacy in Wales. We also refer to the United Nations definition in our Housing First [principles](#) for Wales.
- 1.4 We believe a combination of mechanisms is necessary to achieve the seven factors, including legislation, policy interventions, guidance, robust data collection and regulation. Some of this is already in place, and we believe that the recommendations from the Expert Review Panel on legislative reform will also contribute to this agenda. Information, training and support for landlords should also be considered, alongside financial support for improving the quality and energy efficiency of private rented properties.
- 1.5 In considering the seven factors, we have reflected on our engagement during the past two years with our member organisations, frontline workers and people with lived experience.
- 1.6 **Security of tenure: Housing is not adequate if its occupants do not have a degree of tenure security which guarantees legal protection against forced evictions, harassment and other threats.**
- 1.7 Many of the people we have spoken to have talked about the lack of security associated with the private rented sector, although some of our engagement work happened in the period just before implementation of the Renting Homes (Wales) Act 2016. We welcome the added protections brought about by the Act, but the following comments from people with lived experience highlight how insecurity can affect people's lives and wellbeing, particularly where people have experienced trauma such as domestic abuse. Other comments demonstrate the importance of housing stability and security.

"Private rented is so fragile, if landlord doesn't want you then he can evict."

"I was then served a Section(?) notice, but didn't understand what it was. You feel like you're on the edge. When you're in an abusive relationship you feel like you can be thrown out at any time – I needed stability. It wasn't explained to me what this section was, which made me quite panicked. It definitely added to the pressure and panic."

"Stability, security. That's all I wanted."

"People need security in their lives."
- 1.8 **Availability of services, materials, facilities, and infrastructure: Housing is not adequate if its occupants do not have safe drinking water, adequate sanitation, energy for cooking, heating, lighting, food storage or refuse disposal.**
- 1.9 This is an issue that has been raised by people with lived experience during the last year, particularly in relation to temporary accommodation, where people often do not have access to cooking or food storage facilities and may not have control over heating within the premises. It is also becoming an issue for people who are struggling with housing

affordability and the cost-of-living crisis, with some being unable to afford to use energy for cooking, heating and lighting.

“There were no cooking facilities in TA, how was I going to feed the kids?”

“Then take someone where small, damp, no facilities to make breakfast, prepare food.”

“Basics should include: keep and cook food safely; washing facilities.”

1.10 Affordability: Housing is not adequate if its cost threatens or compromises the occupants’ enjoyment of other human rights.

1.11 Affordability is a key issue in the majority of the conversations we have had with people who have experience of homelessness and is one of the most commonly raised issues by our member organisations.

1.12 The latest Welsh Government statistics show that nearly 11,000 people were in temporary accommodation at the end of June. 1,631 people were placed into temporary accommodation during this month, yet only 582 homeless individuals were moved into suitable long-term accommodation. Our members and people with lived experience tell us that the key reason for this is the lack of affordable, settled housing for people to move into. Social housing waiting lists are too long and rents in the private rented sector are too high for them to afford. This is particularly challenging for people reliant on housing related benefits, which are restricted to the Local Housing Allowance.

1.13 The lack of affordable move on accommodation is also affecting people in supported accommodation. Our member organisations and people with lived experience tells us that they are ready and often excited to move onto independent tenancies, but find they cannot afford local housing. This means they remain in supported housing much longer than they would like, preventing them from reaching their aspirations of independent living. This can also prevent other people from being able to enter supported housing due to lack of spaces.

1.14 As well as high rents, people are also struggling to afford upfront payments associated with the private rented sector such as bonds and rent in advance. Once in accommodation, service charges and utilities can also affect the affordability of the accommodation, particularly if the energy efficiency and heating systems are poor.

“It’s really impossible. There is very little affordable housing and I have been waiting nearly 3 years for social housing.”

“I had no money so couldn’t offer a bond or months’ rent up front. I also couldn’t afford the rental fees.”

“Had to get lots of money upfront for bond, advance rent.”

“Private Rented Sector – too expensive even when working.”

“Universal Credit is just not enough.”

“I had to sell my car to afford to put 6 months’ rent down in advance – the landlord wouldn’t accept any less rent in advance. I wouldn’t have been able to afford otherwise.”

“Landlord increased the rent from £800 to £1,000 with only two months’ notice. I was really upset, he didn’t give me time to think. I asked for a slower increase but the landlord but the flat on the rental market and said there were 20 people who wanted it and would pay the rent. I felt very vulnerable.”

1.15 Habitability: Housing is not adequate if it does not guarantee physical safety or provide adequate space, as well as protection against the cold, damp, heat, rain, wind, other threats to health and structural hazards.

1.16 The condition of both temporary and settled housing has been raised by many people with lived experience of homelessness. This can particularly affect people who have very little choice about where they live, due to their financial constraints or their fears about the housing allocations system. People will sometimes accept poor quality housing because they cannot afford any other properties, which demonstrates the importance of affordability and housing quality being considered together. Some people also told us that they felt pressured to accept substandard or inappropriate accommodation because they feared they would not be offered anything else or would be deprioritised or removed from the housing waiting list.

“The room was small and damp.”

“There were holes in the floor, not safe, not appropriate and not in the right location. They said it wasn’t fit for purpose, so why were they letting it out? You lose trust in the system.”

“Would want a warmer flat for children, for the landlord to put in insulation and do repairs. But I am stuck with landlord who is not going to repair and a risk of increasing rent if I ask for repairs.”

1.17 Accessibility: Housing is not adequate if the specific needs of disadvantaged and marginalized groups are not taken into account.

1.18 We know that marginalised groups such as black, Asian, minority ethnic communities, LGBTQ+ people, disabled people, refugees and asylum seekers often face additional challenges, risk and barriers when it comes to homelessness, overcrowding and accessibility. In addition, people who have experience of the care system, prison system, armed forces or are fleeing abuse or exploitation can have particular support needs or face additional barriers to housing. We believe that ‘Accessibility’ is therefore an essential part of defining housing adequacy. Data collection that considers the experiences and outcomes of disadvantaged and marginalised groups will be essential if we are to better understand and act upon this element of housing adequacy.

“Recently starting using a wheelchair and put on top floor.”

“The biggest problem in all of this is that deaf people can’t contact any of the [housing] services unless they physically go into the office and meet people face to face.”

“Hard work trying to get all the documents they needed. References for every home I’d ever rented. This included the home I had to flee which was left with furniture in etc which was obviously incredibly embarrassing. Having to explain to landlords and estate agents my situation and why I had to flee. Asking them to not give the details to my ex-partner of what area I was in if he came looking for me.”

1.19 We also point to the recommendations in the Expert Review Panel’s report, many of which aim to improve the prevention and response to homelessness for people from disadvantaged and marginalised groups.

1.20 While accessibility is defined by the UN guidance as relating to marginalised groups, a common issue raised by all types of people with lived experience is the inaccessibility of the housing system, from understanding your rights, access advice and information, navigating the homelessness process and housing allocations. It is clear that accessibility of the system needs to be improved for everyone but it is also important to recognise that marginalised groups will face additional barriers.

“Nobody seems to know how the allocations work, the council staff can’t tell me. It’s a lucky dip.”

“Forms are inaccessible and letters can be difficult to understand (dyslexia).”

“People who have a specific need have to navigate so many systems.”

1.21 **Location: Housing is not adequate if it is cut off from employment opportunities, health-care services, schools, childcare centres and other social facilities, or if located in polluted or dangerous areas.**

1.22 The importance of the right home in the right place is frequently referenced by people with experience of homelessness and is central to the sustainability of people's tenancies. This should therefore be key to the Welsh Government's definition of housing adequacy, as well as its aspirations to end repeat homelessness and move to rapid rehousing.

1.23 Being close to family or support networks, health, social care and support services, schools and places of work are really important, and can make or break a tenancy. Similarly, there are people who want to be located away from particular areas to give them the greatest chance of being safe and sustaining their tenancy, such as people who have previously experienced abuse or exploitation, or people in recovery from addiction.

"It takes several buses to get to the school but my child has a disability so they have to get a taxi, which has a significant impact on my finances."

"Moved somewhere with no support network – causes isolation."

"Support in community is crucial."

"There are lots of reasons why people may need to relocate. Someone can be in a situation where they need a fresh start, maybe a family breakdown or lack of opportunities."

"Since moving to Cardiff, X has accessed support services and is now six months sober. He has sustained a support network of his peers in Cardiff, attends regular meetings to help manage his addiction, and has a sponsor who provides invaluable support. X said that if he was forced to move to another area, he would lose his support networks and his 'recovery would be at risk'"

"Many people want to move out of area as they have connections to drug use or violence in their local area. [...] people are trapped in a cycle of homelessness due to being unable to move away from their past."

1.24 The UN Guidance on the right to adequate housing provides much more detail on what a right to adequate housing entails. In particular, there are references to freedoms and entitlements and we suggest that these could be incorporated into the Welsh Government definition of adequate housing.

1.25 Freedoms

- Protection against forced evictions and the arbitrary destruction and demolition of one's home.
- The right to be free from arbitrary interference with one's home, privacy, and family
- The right to choose one's residence, to determine where to live and to freedom of movement

1.26 Entitlements

- Security of tenure
- Housing, land, and property restitution
- Equal and non-discriminatory access to adequate housing
- Participation in housing-related decision-making at the national and community levels

2. What considerations should be taken into account when establishing a minimum core for Wales against the 7 factors of housing adequacy?

2.1 The UN's Economic, Social and Cultural Rights Handbook identifies, "Minimum core obligations must be seen as a first step, not the conclusion of a process of realizing

economic, social and cultural rights. The principle must not be seen as involving a minimalist approach. In particular, it should not be used to imply that only the minimum core of an economic, social, or cultural right is justiciable.”

- 2.2 The Welsh Government should make it clear that a minimum core should be viewed as the minimum essential level of services and that over time, it aspires for housing in Wales to exceed these minimum standards. While the housing sector in Wales is facing significant challenges at the current time, consideration should be given to how standards can be raised once the minimum has been achieved.
- 2.3 Establishing the minimum core is one thing, but delivering it is another entirely. As a result, we also believe that development and delivery of the minimum core should be viewed through the lens of progressive realisation, as defined as governments having a specific and continuing obligation “to move as expeditiously and effectively as possible” towards the full and wider realisation of the right.
- 2.4 We also urge the Welsh Government to consider and define housing adequacy and the minimum core within the context of preventing and ending homelessness. Join up between housing adequacy, the Ending Homelessness Action Plan, upcoming changes to homelessness legislation and the move towards rapid rehousing, is essential if this is to be coherent to key stakeholders and the public.
- 2.5 Another key consideration may be what is achievable in the short, medium and long term. This aligns with our comments about setting a minimum core, but ensuring this doesn’t prevent aspiration or action to achieve higher standards in the future.
- 2.6 In addition, careful consideration should be given to the resourcing needed to support the implementation of the minimum core. Lack of resources should not be used as a reason not to proceed towards housing adequacy, but instead should guide the Welsh Government towards its decisions on capital and revenue budgets, supporting local government and other key stakeholders to implement the required standards, as well as resourcing robust data collection and where appropriate, regulation and enforcement, to ensure that housing adequacy becomes a reality.
- 2.7 We would also support specific consideration of how the minimum core can be achieved for marginalised and disadvantaged groups, alongside the general population.
- 2.8 We are a strong advocate of involving people with lived experience in policy development, and would encourage the Welsh Government to consider how it can continue to listen to diverse voices of people from different parts of the housing system in the development of the minimum core and all other elements of housing policy and legislation.

3. What type of monitoring arrangements and/or enforcement measures should be available to ensure the delivery of housing adequacy?

- 3.1 We believe that data on housing and homelessness in Wales needs to improve significantly to enable policy makers, local authorities and housing providers to make informed decisions about meeting housing need and ensuring housing adequacy.
- 3.2 We support calls for an annual Welsh Housing Survey, which could provide a much more comprehensive data set on housing needs, supply and adequacy in Wales.
- 3.3 The Welsh Government should also consider what existing mechanisms could be used to strengthen data collection and monitoring, such as Rent Smart Wales, Welsh Housing Conditions Survey, social housing data and the National Survey for Wales.

- 3.4 The Expert Review Panel on legislative reform has made a number of recommendations regarding data collection and the new Ending Homelessness Strategic Outcomes Framework could also provide useful evidence.
- 3.5 It will be important for the Welsh Government to ensure that the different data sources can be considered together, complement each other, avoid duplication and fill any existing data gaps.
- 3.6 We also advocate for data to be broken down by disadvantaged and marginalised groups, to enable us to identify and act if particular groups are having poorer experiences and outcomes.
- 3.7 The Welsh Government should also continue to work with organisations which collect data and experiences directly from tenants, people experiencing homelessness and marginalised groups, such as TPAS Cymru, Tai Pawb, Shelter Cymru and Cymorth Cymru.

4. Are there any other considerations or potential implications of working towards delivering the 7 factors of housing adequacy you wish to highlight?

- 4.1 We wish to highlight the important role that housing support services play in helping people to access and maintain adequate housing in Wales. People experiencing or at risk of homelessness have often experienced trauma and it is critical that they have support to navigate systems and secure the right home in the right place to help them to recover and thrive in their communities.
- 4.2 We urge the Welsh Government to increase the Housing Support Grant in line with any other decisions to improve access to adequate housing in Wales, to ensure people do not lose that housing in the future.
- 4.3 We also believe it will be important to consider how any policy or legislative decisions to progress the right to adequate housing will interact with proposals in the upcoming White Paper on homelessness legislation and the Ending Homelessness Action Plan.
- 4.4 In addition, we continue to advocate for a joined-up approach between capital housing development and homelessness need at a local and Welsh Government level.
- 4.5 Finally, as outlines in the research by Alma Economics, incorporation of the right to adequate housing in Wales is estimated to save £11.5bn over 30 years, with benefits to the NHS, Local Authorities, and well-being.

5. Do you agree with the proposal to define “fair” in its broader context?

- 5.1 From our perspective as Cymorth Cymru, we believe the priority in defining fair rents should be the affordability for tenants and prospective tenants. While we do not advocate for a system that is completely unaffordable for landlords and risks an exodus from the private rented sector, we believe the primary focus should be on tenants, with particular consideration of people on low incomes and people who are experiencing or at risk of homelessness.
- 5.2 Too many of the people that our members support are stuck in temporary accommodation for far too long, unable to afford any properties in the private rented sector. For lots of people in this situation, anything above Local Housing Allowance is unaffordable. It is grossly unfair that so many people who have already faced so much trauma and disadvantages are unable to access a home to call their own.

6. What considerations do you think should be taken into account when defining what is meant by fair rents – and how might we avoid unintended consequences?

- 6.1 We agree with the consultation document that the definition needs to be flexible enough to respond to local factors and reflect how affordability impacts on different households. We know that affordability in one local authority can vary wildly to another, and there can be significant variation within a local authority boundary.
- 6.2 The size and composition of households should also be considered, as this can have a huge impact on affordability. For example, we often hear from our members and people with lived experience about the challenges in finding affordable accommodation for people who are single.
- 6.3 Consideration should also be given to the type of housing and whether this is associated with additional costs such as service charges and high energy costs. Rurality and access to services could also be considered.
- 6.4 Welfare policy also needs to be considered. Too many of the people our members support struggle to find affordable accommodation because they are limited by Local Housing Allowance. While we support the Welsh Government's continued representations to the UK Government on this issue, it remains a considerable challenge for many people experiencing or at risk of homelessness.
- 6.5 The Welsh Government should ensure that it has robust data to inform decisions on defining fair rents, including incomes and housing need (including people experiencing homelessness). Decisions should be evidence based and should consider how different groups, particularly people from disadvantaged and marginalised communities will be affected.

7. What considerations do you think should be taken into account when defining "local incomes" – and how should it be defined?

- 7.1 No comment.

8. What measures should be used to assess affordability, and why?

- 8.1 The following measures should be considered when assessing affordability: Wage income (with particular consideration of low incomes), the level of housing related benefits (LHA rates), current rents, household size and composition. Consideration could also be given to the energy efficiency of properties, levels of service charges, and property use (long term private rent, holiday lets, student accommodation).
- 8.2 We are concerned that the ONS definition of a property as being affordable if a household 'spends 30% or less of its income on rent' does not reflect the reality of people on very low incomes and people experiencing homelessness. As highlighted in the consultation document, it is unlikely that people on the lowest incomes will find rented accommodation that is equal or lower than 30% of their income in the current housing market. Even if they do find accommodation that meets this criteria, the remaining 70% of their income is unlikely to be able to cover other costs and they will therefore experience financial pressures, particularly during the current cost-of-living crisis with high food and energy costs.
- 8.3 We are aware that several social landlords in Wales use the Joseph Rowntree Foundation 'Living Rent' model to set their rents, with the aim of ensuring that the rent for each property size is below the living rent calculated for that geographical area. This type of approach could

be considered for the private rented sector. The Real Living Wage could be a useful metric to consider.

- 8.4 The lack of consensus on the issue of calculating affordability demonstrates why we need to better understand how housing affordability impacts on lower income households before adopting particular definitions.

9. Can you provide any additional data or evidence which has not been considered?

- 9.1 No comment.

10. Do you agree that better data on incomes and affordability is necessary to inform policy interventions – and how could this data be obtained?

- 10.1 Yes, we believe better quality data is necessary, particularly data that enables us to better understand incomes and housing affordability at a local level. In particular we are concerned about affordability for people on the lowest incomes, people experiencing or at risk of homelessness, and for people from marginalised or disadvantaged groups.

11. What data do you consider needs to be captured on rents and relevant affordability factors, at what scale, and how often?

- 11.1 The evidence from Alma Economics outlined in the consultation document shows that regional or even local authority level data on affordability can mask some of the differences that exist between Lower layer Super Output Areas. While data collection at this level may require more resource, the Welsh Government should consider whether it would enable more effective and targeted action to support housing affordability.

12. Are there other considerations and potential impacts (including other data sources) you wish to highlight in regard to the current and future private rental market?

- 12.1 It would be useful to understand more about the likely impact of rent control policies on the private rented sector in Wales, with particular focus on supply and quality of accommodation. With social housing being unattainable for most people and the Housing (Wales) Act 2014 enabling local authorities to discharge their homelessness duties into the private rented sector, it is important that policy decisions do not lead to a significant decrease in supply.
- 12.2 Anecdotal evidence of landlords leaving the private rented sector since implementation of the Renting Homes (Wales) Act 2016 has been reported by both representatives of private landlords and some of our member organisations. However, it is unclear whether this has resulted in fewer long term private rented properties across Wales. In addition, the implementation of the Act occurred at the same time as the increase in mortgage interest rates following the UK Government's mini-budget in September 2022. It is therefore difficult to know whether one or both issues was responsible for any decrease in private rented properties.

13. What other sources of data on rent might we draw on to inform policy development and future monitoring and evaluation?

- 13.1 No comment.

14. Do you think there should be a requirement to provide rent information to Rent Officers?

14.1 Yes.

15. How do you think such a requirement could be enacted and enforced?

15.1 Policy or legislative amendments could be made to require private landlords to submit regular data on rent levels to Rent Smart Wales. Failure to do so could result in the landlord's registration or licence being revoked.

16. Should such a requirement apply to all landlords or only some, perhaps larger, landlords? Why?

16.1 We believe that this requirement should apply to all landlords. As outlined in the consultation document, the majority of landlords own one property and only 20% own four or more. It is essential that we have a more comprehensive understanding of housing affordability in the private rented sector, and exempting such a large proportion of landlords would hinder this aim considerably.

17. What do you consider to be the advantages and/or disadvantages of first, second, and third generation rent control measures?

17.1 We do not possess the expertise on rent control to make significant representations on this issue but have offered brief comments on rent control measures in answer to question 21.

18. What factors should apply to determine if a rent control measure is required?

18.1 No comment.

19. Who should be responsible for determining if a rent control measure is to be introduced?

19.1 The Welsh Government and local authorities, with engagement with key stakeholders.

20. How could compliance with a rent control measure be monitored and enforced?

20.1 Regular data collection via Rent Smart Wales and the ability to revoke registration or licences.

20.2 The Welsh Government and Rent Smart Wales would also need to make efforts to raise awareness among private rented sector tenants, so ensure that they are aware of the rent control measures in place, understand where to get housing advice if they believe their rents have been raised beyond the rent control measure, and know how to raise a concern with Rent Smart Wales.

20.3 The Welsh Government will also need to consider how Rent Smart Wales is resourced to monitor and enforce a rent control measure

21. Do you have any views on the models for rent control measures?

21.1 While we support the Welsh Government's consideration of rent controls as one of several mechanisms for improving affordability, we do not believe there is enough evidence, nor do

we possess the expertise at Cymorth Cymru, to recommend a particular rent control measure as part of our consultation response.

- 21.2 While we must emphasise our lack of expertise regarding particular rent control measures, we offer some initial comments on a selection of the models referenced in the consultation document:
- 21.3 We can see the obvious and immediate attraction of first generation rent control measures such as the rent cap being applied in Scotland. The protection from huge increases in rents could be an effective measure to protect tenants in the private rented sector at a time when rents have been increasing significantly. As highlighted in paragraph 1.14 of this response, we have spoken to people who have faced significant increases in rent that had led them to experience of become at risk of homelessness. Protection against this kind of practice would therefore be welcome, particularly at a time when affordability and the cost-of-living crisis is having a huge impact on people's lives. However, we also recognise concerns that landlords will simply raise their rents to the maximum allowable, to protect against the possibility of lower caps in future years. This could result in higher rent increases than they would have ordinarily implemented, had there been no rent cap in place. It would appear that rent caps could be a useful measure during times of acute pressure, but the unintended consequences should be explored further. The Welsh Government should pay particular attention to how this policy progresses in Scotland.
- 21.4 Rent caps on existing tenancies would also need to be accompanied by controls on setting new tenancies, such as a 'rent reset', otherwise landlords may set much higher rents from the start of a contract to guard against restrictions on annual increases. This would be in line with the description of third generation rent control measures in the consultation document.
- 21.5 The Quasi Social Rent Model could be a useful approach as part of a number of measures to improve access to truly affordable housing, but is unlikely to have a significant impact in isolation. We believe the Welsh Government should explore this as part of a wider package of measures to increase affordable housing supply. While supporting social landlords to build new social homes should continue to be the priority, we have seen how schemes such as the Transitional Accommodation Capital Fund can bring units into play at a time when we desperately need to increase housing options for people experiencing homelessness. The Quasi Social Rent Model could counteract the frustration that many people feel when private developers renege on their Section 106 commitments. We would therefore support requirements for private developers to make a proportion of the properties within each development available at LHA rates via the Leasing Scheme Wales or available to be purchased by social landlords. This would also bring the added benefits of mixed communities, with both social housing and private rented housing on the same site.
- 21.6 With regards to the 'Energy/Quality Based Model', we are concerned that any measures which are linked to the condition of the property or its energy efficiency could lead to a two-tiered rental market, where people on the lowest incomes are living in the poorest quality properties.

22. Do you have any further evidence or observations that you wish to provide?

- 22.1 While we welcome the exploration of rent control measures as part of the discussion on housing affordability, we question whether the appetite for such measures is a symptom of a broken housing market and welfare system.
- 22.2 Regardless of whether the Welsh Government wishes to pursue rent control measures in Wales, we cannot overstate the importance of dealing with the structural factors that have led

to the housing affordability crisis including inadequate social housing supply and a welfare system that does not provide enough support to meet people's housing costs.

- 22.3 It is imperative that this Welsh Government, and the next one, continues to focus on increasing social housing supply, providing the necessary capital funding to meet the shortfall.
- 22.4 The Welsh Government should also continue to explore and implement schemes such as the Transitional Accommodation Capital Programme, Empty Homes Grant and the Private Sector Leasing Scheme, which increase affordable housing options while social housing schemes are being developed and built. Interventions to increase affordable housing in areas with a high proportion of holiday lets and second homes should also continue to be explored, implemented and evaluated.
- 22.5 The UK Government must also act to increase Local Housing Allowance rates to cover the lowest 30% of rents, remove the benefit cap, and abolish the shared room rate for people under 35 years of age.