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Consultation Analysis for the White Paper on securing a path towards Adequate Housing, including Fair Rents and Affordability

Mae'r ddogfen yma hefyd ar gael yn Cymraeg.

This document is also available in Welsh.

Consultation on the White Paper on securing a path towards Adequate Housing, including Fair Rents and Affordability

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Views expressed in this report are those of the researcher and not necessarily those of the Welsh Government

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Glossary

Abbreviations

ACORN

The Association of Community Organizations for Reform Now (ACORN) is a membership organisation of low-and-moderate income tenants, workers, residents. ACORN organised a campaign of 128 standard responses submitted to this consultation.

API

Application Programming Interface - a set of rules and protocols that allows different software applications to communicate and exchange data.

APCR

Annual Property Condition Record - a basic assessment of a property's condition, highlighting any obvious defects or risks, but without providing a valuation.

CRIA

Child Rights Impact Assessment

DWP

Department for Work and Pensions

EDI

Equality, diversity and inclusion

EPC

Energy Performance Certificate - a document that assesses and rates the energy efficiency of a building, using a scale from A (most efficient) to G (least efficient), and provides recommendations for improvements.

FFHH

Fitness for Human Habitation

GP

General Practitioner

HHSRS

Housing Health and Safety Rating System - used by the council to assess the effect of certain hazards on the health, safety, and wellbeing of the occupants.

HMRC

HM Revenue and Customs - the UK's tax, payments, and customs authority.

IAP

Individual Assistance Payment - a grant provided by the Discretionary Assistance Fund that aims to help potentially vulnerable individuals, such as those leaving a care home or institution or those moving homes due to domestic violence, to live independently in their home.

ICESCR

International Covenant on Economic, Social and Cultural Rights - A UN treaty setting out commitments to protect the economic, social, and cultural rights of individuals, including rights to work, education, health, and an adequate standard of living.

LA

Local authority

LHA

Local Housing Allowance - used to calculate how much housing benefit or universal credit a renter may be entitled to when renting from a private landlord.

LSW

Leasing Scheme Wales

LTT

Land Transaction Tax

MSOA

Middle Layer Super Output Area

NRLA

National Residential Landlords Association

PRS

Private rented sector

RSW

Rent Smart Wales

TPAS Cymru

Tenant Participation Advisory Service Cymru

WG

Term definitions

Short-term lets

Short-term lets are defined under planning regulations as dwelling houses used for commercial short-term letting, where each period of occupation is no longer than 31 days.

Kinship carer

A kinship carer is an adult who is looking after the child or children of a relative or close friend on a full-time basis.

Cultural adequacy

Housing that respects the expression of cultural identity in the way that it has been constructed. Development or modernisation in the housing sphere should ensure cultural dimensions are not sacrificed.

Legal security of tenure

When tenants live without fear of forced evictions, harassment of any nature and other threats.

Executive Summary

Introduction

The Welsh Government's White Paper on securing a path towards Adequate Housing, Fair Rents, and Affordability was generally met with positive sentiment by respondents. The White Paper aimed to address two overarching aims that are closely related: adequate housing and fair rent. Questions in the paper were divided into these broad categories with questions 1-8 concerned with adequate housing and questions 9-20 concerned with fair rent. This executive summary provides an overview of the themes that were present in responses to the White Paper, as well as an overview of sentiments towards the proposals.

Findings

Affordability and economic viability

The main theme that runs through the White Paper is the issue of affordability. Adequate housing was often discussed in terms of the financial strain that high rents place on tenants, particularly younger people and low-income families. Many respondents emphasised the need for mechanisms to cap, regulate, or challenge rising rents to ensure that housing remains affordable. This view, however, was not shared by all respondents, with many individual respondents (including landlords) suggesting that any proposal to cap or regulate rents would have a negative impact on the availability of housing supply in the private rented sector and potential for wider implications on the diversity and quality of the housing offer in Wales. However, the White Paper did make clear that rent caps or regulations were not being considered as part of the proposals stating that “It is not therefore our intention to take forward rent control measures in the PRS [private rental sector] at this time.”¹

Security of tenure

Respondents highlighted the critical need for stronger protections against eviction, particularly in the context of the private rented sector. Respondents suggested in the fair rent section the need for a robust rent challenge mechanism to prevent unjustified rent hikes and retaliatory evictions. Responses to the adequate housing section reinforced this by stressing the importance of long-term, stable tenancies as a critical part of housing adequacy, as well as the necessity for legal security of tenure.

Habitability and maintenance

The condition of housing stock and inadequate habitability, including issues with damp, poor insulation, and overall property maintenance, was a common thread in both the adequate housing and fair rent sections. Respondents suggested that housing quality assessments, including the introduction of annual property condition records, could help to improve accountability and ensure that rental properties meet basic health and safety standards.

¹ Page 46

Transparency and accountability

The concept of greater transparency in the housing market was raised in response to both sections. In the adequate housing section, respondents advocated for better data on housing conditions and the inclusion of accessibility data to ensure that diverse needs are met. The fair rent section responses supported this by emphasising the importance of rent transparency, proposing that rent data collection could empower tenants and guide policy decisions to ensure rents are fair and market-driven.

Conclusion

As discussed, the White Paper was met with generally positive sentiments. Respondents agreed with the propositions presented in questions 3, 5, 6, 9, 11, 12, 13 and 16. The only questions where respondents did not agree with the proposition was question 2 where respondents expressed a preference for regional or local variations for indicators rather than a national standard. Two questions received mixed responses, these were question 4 regarding applying the adequate housing framework to the owner-occupied sector, and question 18 regarding the proposed refund of the Land Transaction Tax. Finally, asked to consider how often the strategy should be reviewed, and progress should be reported, in questions 7 and 8 respectively, respondents suggested an annual timeline.

1. Introduction and background

In January 2025, the Welsh Government commissioned Miller Research to analyse the responses to the “Consultation on the White Paper on securing a path towards Adequate Housing, including Fair Rents and Affordability”. This report provides a brief background to the policy area and consultation before summarising the consultation methodology and findings.

The White Paper realises the Welsh Government’s Programme for Government commitment to “Publish a White Paper to include proposals for a right to adequate housing including fair rents and new approaches to making homes affordable for those on local incomes”². The White Paper was informed by input from the White Paper Stakeholder Advisory Group³ and builds on evidence gathered from the Green Paper consultation in 2023. While the Green Paper served as an exploratory “call for evidence,” the White Paper translates the insights gathered into structured proposals for legislative action.

The White Paper seeks to establish a framework for what constitutes adequate housing, drawn from criteria by the United Nations (security of tenure, affordability, habitability, accessibility, availability, location, and cultural adequacy) and subsequent indicators to monitor these aspects of housing policy.

The White Paper focuses on improving rent data collection and spatial mapping to inform targeted interventions, regulating rent increases, and promoting transparency in the private rented sector (PRS).

The White Paper aims to address affordability and other issues faced by renters in the private rented sector. These include exploring mechanisms like permitting payments to support renters (e.g., those with pets) and incentives for landlords to increase affordable housing access (e.g., tax refunds for properties leased to local authorities). It recommends mechanisms like the Annual Property Condition Record to ensure habitability.

In addition to the consultation, the Welsh Government ran consultation events with tenants and landlords both in-person and online. A summary of these events can be found in Annex A.

Report structure:

- Section 2 outlines the methodology and overview of responses.
- Section 3 presents the complete consultation analysis for standard responses received on a question-by-question basis.

² [Welsh Government Programme for government: update \[HTML\] | GOV.WALES](#)

³ The White Paper Stakeholder Advisory group is a group of stakeholders which was established to inform the development of the White Paper, by ensuring engagement and consideration of stakeholder’s views. The Stakeholder Advisory Group consisted of organisations providing a representative voice for private sector landlords, letting agents, and the third sector.

- Section 4 presents the complete consultation analysis for non-standard responses received.
- Section 5 presents a summary of the easy-read responses.
- Annex A contains a summary of the Welsh Government engagement events.
- Annex B contains the consultation questions.

2. Methodology and overview of responses

Table 2.1 Response types to the consultation on the White Paper on adequate housing and fair rents

Response type	No. of respondents
Full consultation (standard responses)	279
Easy-read responses	7
Non-standard responses	22
Total	308

Source: Miller Research analysis of consultation responses

Three responses were received in Welsh and all other responses were received in English. A campaign was conducted by the organisation ACORN, a membership organisation of low-and-moderate income tenants, workers, and residents where individuals submitted 128 campaign responses.

While the consultation document did not ask respondents to identify with a stakeholder grouping, the analysis team grouped respondents based on their email address or organisation name. This resulted in the indicative stakeholder breakdown in Table 2.2, however, this should be treated with a degree of caution due to respondents not self-selecting a stakeholder group.

Table 2.2 Response types by stakeholder group

Stakeholder group	No. of respondents
Academic	1
ACORN campaign	128
Charity and third sector	20
Individual	96
Local authority	12
Private sector	10
Public sector	5
Representative body	5
Registered Social Landlord	2

Total	279
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Source: Miller Research analysis of consultation responses

Quantitative analysis

Quantitative analysis was undertaken for all closed questions contained within the consultation. In total, this included 13 out of the total 24 questions with each relevant question presented in graph format. The 128 ACORN campaign responses have been included in the quantitative analysis as each response associated with the ACORN campaign was submitted individually in the standard format.

Qualitative analysis

An initial 'blind' sample of 50 responses was undertaken to assess the general sentiment of respondents in relation to the proposals, as well as the key emerging and recurring themes.

Themes were grouped and 'branched' for each individual question, using virtual data visualisation software to aggregate responses. This visualisation of responses helped to produce a 'picture' of sentiment (e.g. highlighting the range of concerns or clarifications raised in response to a proposal, in contrast to the comments which may indicate support).

Full analysis (of the remaining responses) was then conducted, with attention paid to the emergence of new themes and the evolution of existing ones. This phase allowed for the refinement and reorganisation of the thematic framework, accommodating new perspectives that were not evident from the sample.

Throughout the process, particular attention was given to changes in the relative weighting of themes based on the volume of responses. Themes that emerged more frequently were given greater emphasis, highlighting the areas of most interest to the respondents.

3. Summary of Responses

Question 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 narrative accompanying the question presented considerations in relation to the seven factors of housing adequacy, supported by the framework set out in the International Covenant on Economic, Social and Cultural Rights (ICESCR). The seven factors were listed for respondents, and they were encouraged to use the relevant headings to provide suggestions for appropriate indicators.

Responses to this question focused primarily on the factors of legal security of tenure and affordability. Respondents suggested a range of potential indicators which could be used to measure the extent to which these factors are achieved in Wales.

This section presents the key indicators suggested by respondents (according to the most common themes of interest), but it is not exhaustive. A comprehensive list of all indicators suggested by respondents has been shared with WG in a separate database to inform future policy development.

Legal security of tenure

Legal security of tenure generated the most feedback from respondents, and was seen to be the foundational factor under-pinning the framework. Points raised within responses relating to this factor included the importance of monitoring; the legal status of evictions; tenant rights and advice; tenancy lengths; protections and assurances for landlords; and the impact of policies and services on reducing homelessness. Respondents shared indicators related to the legal status of evictions and better tracking of the legal process, also suggesting that mandating reasons are provided for every eviction could support legal security of tenure.

The primary indicators proposed by respondents included:

- legal status of no-fault evictions
- legal status of evictions
- legal protections from no-fault evictions (notice period, protected period, no re-let period etc.)
- legal protections from illegal eviction
- legal protection from discrimination
- incidents of reported harassment or discrimination
- average length of tenancy

- numbers of occupancies across all tenure types
- number of evictions (all grounds)
- number of evictions (no-fault)
- number of evictions (illegal)
- number of retaliatory evictions protected against through the Renting Homes (Wales) Act 2016
- rate of no-fault eviction notices issued per 10,000 households (broken down by local authority and by demographic group)
- number of people presenting as homeless following eviction.
- data on tenancy contract lengths (and longer than average tenancies)
- levels of rough sleeping
- data on the number of people forced to move due to unaffordable rent rises (i.e. 'economic evictions').
- numbers of people in temporary accommodation (and average length of time spent)
- number of rent repayment orders
- number of instances per annum where a landlord is seeking fair possession
- time between issue of notice and possession
- numbers of occupancies across all tenure types
- use of an annual housing survey so that all individuals can self-report on security within tenancies
- applications to the Help to Stay programme
- impact of second homes on short-term letting and long-term empty properties

Respondents also discussed the role of Rent Smart Wales in aggregating data to measure against the suggested indicators. It was suggested that agreed templates could be used to set out the quality of tenure, and that the number of signed contracts meeting this standard could be recorded to provide quantitative insight.

Together with proposing indicators that respondents proposed, some respondents suggested that stronger measures were needed to protect private renters. These included access to an ombudsman for private renting (to support with decision-making and legal caseload) as well as making trends and demographic data publicly available. It was also suggested that the impact of insecure tenancies should be better understood and that further support for tenant advice services could help to improve legal protections for renters.

Some respondents called for relocation relief (no-fault eviction compensation) to be provided when landlords end a tenancy and this would mean that tenants are not required to pay rent during part of their notice period.

In the context of discussions around security of tenure, 12 respondents reflected on the need to provide security for landlords within the rental relationship, noting the need for security to 'work both ways', so that landlords can regain their properties when their circumstances change. In 3 cases landlords shared how circumstances would influence their personal ability to remain active in the private rented sector. Respondents also shared the importance of tenants upholding their responsibilities, and local authorities taking action with problematic tenants to reduce time taken to reach a resolution.

Affordability

Respondents strongly emphasised the importance of monitoring the proportion of an individual's income (or even the average income) against the cost of rent. This data may be useful to understand how the most deprived groups are disproportionately affected by the proportion of rent they have to pay.

It was also suggested that an affordability limit could be identified and monitored by WG, that monitoring of average rents should be compared against local housing allowance, and that third sector organisations could play an important role in providing data to support such indicators.

Specific indicators to measure this factor included:

- the rate of households that spend more than 30% of their household income on housing
- average proportion of household income spent on housing costs.
- comparing average income in local authorities against rent prices
- rent to median-income ratio of all private renters
- rent to median-income ratio of low-income private renters
- overall housing costs (rent, bills, tax etc.) to median-income ratio of all private renters
- Overall housing costs (rent, bills, tax etc.) to median-income ratio of low-income private renters
- percentage of properties in the private rented sector occupied by those in receipt of Housing Benefit
- percentage of household income spent on wider housing costs (including utilities)
- affordability indices used by tackling poverty organisations and campaigns
- affordability according to population need and demographic (particularly for those transitioning from support services e.g. women fleeing domestic abuse)

- percentage of renting households receiving housing benefits
- average rents to local housing allowance ratio

Respondents raised considerations regarding affordability for landlords, suggesting that affordability of renting out a property against market conditions such as maintenance and mortgages could be monitored for landlords in order to identify when policy action needs to be taken. It was suggested that actual rent recorded (paid) and number of people withholding rent could support these considerations.

Habitability

Responses in relation to habitability commonly raised considerations for protection against environmental hazards, raising issues such as damp and mould, inadequate ventilation, poor insulation and resulting effects on tenants' health.

Suggested indicators included:

- percentage of dwellings that meet minimum building and safety standards
- average floor space per dwelling
- average floor space per person
- percentage of homes free from damp, mould and structural issues
- number of people accessing healthcare due to poor housing conditions
- percentages of dwellings with adequate insulation and ventilation to prevent dampness and mould
- minimum energy efficiency standards
- housing Health and Safety Rating System (HHSRS)
- monitoring of category 1 hazards (e.g. excess cold)
- percentage of dwellings free from hazards

Availability of services, materials, facilities and infrastructure

Indicators relating to energy and utilities gained the greatest range of suggestions in relation to availability of services, materials, facilities and infrastructure. Overlap was observed here with the habitability indicators. There was some discussion surrounding responsibility and accountability. For example, some respondents felt that services and facilities infrastructure were purely local government issues and there should be no monitoring of this in the private rented sector .

Proposed indicators included:

- the percentage of dwellings with access to electricity, heating, cooking facilities

- the availability of an energy supply within residential areas
- reliability of infrastructure (dependable services)
- energy performance certificate (EPC) ratings
- indicators to reflect the need for renewable energy provision (access to alternative sources such as solar panels and air source heat pumps to reduce carbon usage and reduce household running costs)
- access to safe drinking water and adequate sanitation
- internet and digital access (seen as essential for modern living, supporting education and employment)
- transport considerations: monitoring availability of public transport, aggregated data on electric vehicle charging points)
- better understanding of service availability in each local authority, and provision of funds for those who are lacking

Accessibility

Commonly cited accessibility considerations included the importance of achieving adequate housing for disabled people, and respondents shared insights on the specific needs of marginalised and protected characteristic groups.

Proposed accessibility indicators included:

- percentage of dwellings that meet the Lifetime Homes Standards
- percentage of new builds that meet the Lifetime Homes Standards
- number of disabled people on the waiting list for an accessible home
- time/distance to nearest public transportation for urban and rural areas
- time/distance to healthcare services
- number of people on the adapted property housing list
- length of time disabled people spend on social housing waiting lists
- average length of wait time for grants approved to adapt homes for disabilities and health conditions
- number of households/individuals requiring specialist supported accommodation
- number of applications disabled facilities grants received/approved
- proportion of new build housing stock meeting accessibility standards and designed for disabled people

- number of accessible properties available on accessible housing register
- affordability of adjustments and adaptations for disabilities within the private rented sector and social housing sector
- improving data/monitoring of barriers to accessible housing for marginalised groups (including young people in the context of housing)

Location

The main themes of responses relating to location were distance from essential services (e.g. healthcare, schools) and other amenities. In some cases, these overlapped with accessibility considerations, but from a locality perspective. Other themes also included placemaking, safety, access to green spaces, and freedom of location choice.

Suggested indicators for the factor of location included:

- percentage of dwellings within a defined radius of essential services (schools, healthcare, employment hubs etc.)
- percentage of dwellings within a defined radius of public transportation
- average commute times for all renters
- average commute times for low-income renters
- distance to general practitioner (GP) and primary care services
- ratio of homes to available GP and dentist clinics
- proximity to specialist support services (for complex needs)
- number of tenants experiencing issues with accessing school of choice, healthcare, and childcare, due to lack of transport infrastructure and lack of service infrastructure
- integration of census data to factor in age of populations (and associated impacts on opportunities, school places, and communities)
- self-reported feedback to understand satisfaction with housing locations
- proximity to amenities (food shopping, sports facilities, petrol stations, libraries, post office etc)

Wider comments also suggested that using location as a factor provides rationale for mapping the availability of social housing and private rented sector housing, as well as the tracking of new housing developments.

Some respondents noted location to be a more subjective measure, and highlighted the challenges associated with monitoring this.

Some comments acknowledged affluence and choice as realities of the market, as well as the variation in factors influencing choice of location. For this reason, the advantages of an annual survey were again raised.

Cultural adequacy

In defining ‘cultural adequacy’, the White Paper set out that:

“housing is not adequate if it does not respect and take into account the expression of cultural identity in the way it is constructed. Development or modernisation in the housing sphere should ensure that the cultural dimensions of housing are not sacrificed.”

This aspect of the UN’s framework focuses primarily on the construction methods used when developing housing and is mainly concerned with making sure that housing is culturally sensitive in the way it is built. This factor may be of particular relevance in contexts where people live or wish to live in housing that is different from the type of housing that is typically viewed as being conventional and modern. Most respondents who provided a response to this aspect of the question appeared to interpret ‘cultural adequacy’ differently, focusing on considerations relating to the Welsh language and culture.

Respondents identified cultural adequacy as the most subjective factor in the framework. For this reason, there was a greater emphasis on the role of self-reported feedback to provide data against the indicators. Respondents also emphasised the need for consultation on cultural adequacy (in the absence of data) with marginalised and vulnerable groups.

The primary themes considered (beyond the suggested indicators) were Welsh language, impacts on community cohesion, and unintended consequences linked to cultural adequacy. Eight respondents shared considerations on the ways that inadequate housing impacts the [Welsh Language Communities Housing Plan](#). Respondents expressed that it would be important for an adequate housing framework to sustain, enable, and facilitate Welsh speakers to continue living in communities where Welsh is the natural language.

Suggested indicators for cultural adequacy included:

- percentage of developments that consult with the local community and undertake cultural impact assessments to ensure that they respect and take into account the expression of cultural identity
- number of Welsh medium and English medium schools in the area
- placemaking indicators (to encourage Welsh language and culture)
- live register of holiday lets (compared against areas of higher density linguistic significance)
- alignment of housing policy with the [Cymraeg 2050](#) strategy and placemaking plans
- distance to places of worship

- availability of larger homes for extended/multigenerational families
- sites available for Gypsy, Roma and Traveller communities
- housing register data broken down by demographic (to understand who is/is not being housed)
- safety indicators in local areas (particularly when housing women and young people)

Wider views on the framework

Four respondents (2 private sector respondents, 1 charity and third sector respondent, 1 individual) indicated that the proposed framework does not go far enough, sharing support for the mechanisms set out by 'Back the Bill' campaign, which calls for a legal right to adequate housing. These responses positioned the framework as falling short of recognising a right to housing, as expressed by the Wallich⁴:

'We believe that this is a missed opportunity to embed a human right to housing within Welsh law, which has the potential to be transformative in how we think about housing and homelessness in Wales.'

Specifically, this respondent cited the link between the UN's guidance to freedom and entitlements for individuals, and highlighted feedback from refugee experiences in Wales which found that respondents did not feel landlords or estate agents would let properties to them due to their nationality.

Importance of aligning with existing standards

Respondents also highlighted the importance of synchronising any new indicators with existing reporting requirements, to avoid duplication, streamline processes, and minimise burden. There was also a view that existing datasets would likely be sufficient to provide evidence against the seven factors. For this reason, a full review of data already collected was encouraged to understand gaps more clearly, and to minimise overlap.

Some also explicitly prioritised certain factors over others, and suggested that not all factors would be realistic to measure and because of this some factors should be given more prominent consideration than others. However, views were not consistent in terms of which factors should be prioritised.

Criticisms

Criticisms raised in response to the premise of the framework included views that it is too idealistic, provides an imbalance in legislation that favours the rights of tenants, and CLA Cymru suggested that it fails to address the issue of "lack of supply of housing".

⁴ The Wallich is a charity that provides support and solutions to end homelessness in Wales. It offers accommodation, learning, employment and intervention services.

Question 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?

Question two asked respondents to consider whether the proposed indicators should be applied on a standardised basis across Wales or whether there should be a degree of variation in how it is applied to take into account the local context.

Table 3.1: Sentiment analysis of responses to question two

Response	No. of respondents
Yes	59
No	165
Don't know	11
No View	10
Inconclusive	11
No Answer	23
Total	279

Source: Miller Research analysis of consultation responses

Table 3.2: Responses to question two by stakeholder group

Stakeholder Group	Yes	No	Don't know	No View	Inconclusive	No answer (-)	Total
Academic	1						1
ACORN Campaign		128					128
Charity and third sector	10		1		5	4	20
Housing sector	2						2
Individual	36	27	9	10	1	13	96
Local authority	4	6			1	1	12

Private sector	4	1	1			4	10
Public sector	2			3			5
Representative body		3			1	1	5
Total	59	165	11	10	11	23	279

Source: Miller Research analysis of consultation responses

Overall, 59 respondents indicated that they believed any framework should apply consistently across Wales.

The ACORN Campaign responses stated that everyone should have equal access to the same housing standards wherever they live. However, they suggested that there may be instances where a one size fits all approach might not be best. For example, measures of location that are suitable for an urban area may be unsuitable for remote areas and this could undermine the supply of rural housing.

Charities, third sector, and individual respondents were more supportive of a consistent application of housing adequacy indicators across Wales. Whilst the WLGA suggested that the measures should be designed in a way which is applicable to all areas (including rural and urban communities), individual local authorities were more divided in their views, reflecting on their view that the measures should reflect their own local needs and contexts.

Responses to this question were nuanced, and the numerical breakdown of responses should not be considered in isolation. In many cases, respondents selected a closed response whilst caveating their answers in supporting comments and indicating that a mixed or two-tier approach would be the most suitable option. Many respondents who answered 'yes' (consistent application) also raised caveats and conditions to support their responses. These are presented in more detail in the Caveat section below.

Support for consistent application

In general, respondents who were supportive of a national roll-out (without caveats) emphasised the importance of consistency in the application of policy, stating that a 'minimum core' for housing adequacy demands standards to be applied in the same way across Wales.

Respondents felt that this would ensure fairness, both across tenure types (so that private tenants share the same rights as social tenants), but also to ensure that housing associations and councils have the same obligations as the private rented sector. In some cases, the challenges of consistent policy application were acknowledged, but the principles of a consistent standard for all were positioned to hold more importance. For example, one respondent noted:

‘It [applying the housing adequate housing framework] probably won’t work and any legislation will have unintended and sometimes unfortunate consequences. However I feel it should be applied equally across Wales as a matter of fairness.’

Other reasons shared in support of consistency included a need to simplify and streamline policies, making it easier for the Government to keep track of monitoring, and easier for tenants, landlords, and agents to abide by any requirements. Additionally, respondents reflected on areas where localised approaches are felt to be ineffective, such as planning, where different standards apply based on perceived local need.

Caveats

Those who responded ‘yes’ to a consistent approach raised the following nuances and considerations to support their answers:

- eleven respondents indicated support for some degree of flexibility or localised variation, within a national framework
- consistent requirements should also be applied to housing associations and councils, and the expectation for private rented sector landlords should not be higher than that of public sector services and providers
- affordability must be tackled ‘head on’ as a first priority, as this will have a knock-on effect on the other factors
- a third sector respondent highlighted incidents in which regional application of policy can be seen to undermine equity for disabled tenants, drawing on the disparities in access to Disabled Facilities Grants, which have been observed in similar areas within neighbouring local authorities

Geographic considerations and affordability considerations

Respondents that disagreed with the premise suggested that a degree of localised variation is necessary and shared reflections on potential geographic considerations (and local contextual factors) which may be relevant to variations in rent levels and affordability concerns. Thirteen respondents shared views on geographic disparities to support their answers. These centred around the differences observed between rural and urban areas, and the levels of services available respectively. These differences were also linked to affordability and perceptions of reasonable housing conditions which they expressed are likely to vary across local authorities. Respondents considered implications for different areas, for example, areas with higher levels of homelessness, greater social housing needs, dispersal areas for asylum seekers, and areas with student populations. Areas with high levels of tourism were also provided as an example in this context, with respondents noting how tourism levels can affect the housing available for local residents.

Respondents concerned about affordability viewed ‘extra Government regulation’ (via the indicators) as a risk to the private rented sector, and to tenants in the event of increased costs. Another felt that it was important to assess local indicators based on the economics of the local area.

Implementation

In terms of implementation, some argued that regional differences could be introduced through local authority measures. Nonetheless, they maintained that while some local adaptation might be permissible, the core indicators must be applied uniformly across Wales.

Question 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?

The supporting information provided in the consultation document acknowledged the differences in housing costs between locations across Wales and also noted that costs can vary significantly **within** local authority areas. This means there could be particular challenges to accessing adequate housing in certain areas within a local authority area. This question asked respondents whether individuals and families should expect to be able to access adequate housing in a specific locality of their choosing within a local authority area.

This question attracted a high level of engagement, prompting detailed responses from local authorities, who sought to evidence the possible consequences of the proposal within the context of their population needs. A considerable number of blank/inconclusive responses were also observed in relation to this question, as the complexities in providing a decisive answer were acknowledged by respondents.

Table 3.3: Sentiment analysis of answers to question 3

Response	No. of respondents
Yes	177
No	46
Don't know	10
No View	12
Inconclusive	11
No Answer	23
Total	279

Source: Miller Research analysis of consultation responses

Table 3.4: Responses to question 3 by stakeholder group

Stakeholder Group	Yes	No	Don't know	No View	Inconclusive	No answer (-)	Total
Academic	1						1

ACORN Campaign	128						128
Charity and third sector	10				5	5	20
Housing sector	1				1		2
Individual	27	36	9	11	1	12	96
Local authority	3	7			2		12
Private sector	2	1	1	1	1	4	10
Public sector	3	1			1		5
Representative body	2	1				2	5
Total	177	46	10	12	11	23	279

Source: Miller Research analysis of consultation responses

Whilst charities and third sector organisations were broadly in favour of this proposal from a rights and fairness perspective, the majority of local authorities who responded to this question (7) did not agree and raised concerns about expectation setting in relation to local choice.

The ACORN Campaign conveyed the view that people should be able to access adequate housing in any locality of their choosing. They stated that enabling people to live in localities of their choosing creates benefits that extend far beyond the individual tenant, such as generating a sense of community, enabling people to put down roots to a local area, building support networks and keeping children in their local school.

Q3i: What are your views on this matter?

Key themes

Those who agreed that people should be able to choose where to live within a local authority area offered a range of advantages through their supporting comments.

Access to employment and services

The importance of access to employment, services, amenities, and transport networks was a primary theme for those in favour of people being able to select their preferred housing location. Respondents referenced proximity to employment, training, and education opportunities to sustain income; as well as access to essential services including healthcare and schooling. Specifically, responses highlighted that locality preferences within local authority areas require greater consideration where individuals don't drive, or public transport infrastructure is insufficient. Other respondents highlighted immediate proximity to

family and support networks as priorities, particularly for vulnerable groups, to maintain social connections, support with childcare, and to protect people's wellbeing.

Some respondents also noted that closeness to places of worship would be a priority for faith groups.

Reducing inequalities

In terms of community cohesion, there was an acknowledgement that communities can be threatened when entire localities become affordable only to the highest income households, and guaranteeing people a right to live in an area of their choice within a local authority was presented by some respondents as providing a way for people to live in areas that would otherwise be unaffordable for them. This was reinforced by observations that key workers are increasingly 'priced out' of the areas they work in, despite the fact that they are essential in all communities. Allowing choice of housing within wards was suggested by Llamau⁵ to 'help break down historical inequalities and income-based segregation', supporting the expectation of choice at the ward level.

Alignment with adequate housing criteria

Local choice was also perceived to be an appropriate consideration in relation to the factor of location in the adequate housing framework, however respondents suggested that whilst enabling access to adequate housing is important, enabling access to housing in a preferred locality was viewed by a number of respondents not as an essential requirement but rather a 'nice to have'. It was recognised that given current pressures on certain local authorities to meet local housing needs, a degree of flexibility would be required based on the location of the housing stock available.

Caveats

Whilst 177 respondents agreed that people should be able to choose where to live within a local authority area (49 respondents and the ACORN campaign), a number of caveats were provided in supporting comments. Broadly, respondents agreed with the principle from a fairness and equalities perspective, but recognised the practical challenges associated with implementation. Caveats included:

- addressing housing supply: respondents felt that the insufficient supply of housing across all tenure types would restrict the ambition to offer locality of choice
- rurality: expectations may need to be more realistic for prospective tenants in rural locations and local authorities with limited housing options in their respective localities
- costs and local context must still be part of each individual appraisal process
- some groups require broader consideration (for example, advocacy groups recommended that refugees should have flexibility in where they choose to live)

⁵ Llamau is a homelessness charity in Wales that supports the most vulnerable young people and women.

across all 22 local authorities and have influence over which areas they are housed in)

Implementation

In terms of implementation, 3 respondents suggested that individuals and families should have the right to request their choice of location, and that public authorities should have the duty to deliver as far as possible. Another suggested that choice could be granted if there are suitable properties available, but that otherwise priority should be given to those with the greatest need.

Those who disagreed that people should be able to choose to live in a specific area within local authority areas (when responding to the closed question) presented practical considerations and noted that housing should be accepted where it is offered and available:

- some respondents cited the realities of cost disparities across locations, expressing it seems 'reasonable' that people may not be able to access adequate housing in the exact locality of their choosing
- another responded that it would prompt complaints from those who were not able to access the 'best' areas for schools and workplaces
- contrary to positive comments in relation to locality protecting communities, one respondent posed the risk that current 'deprived' areas could be left in a downward spiral, if preferences to move to 'nice' areas were always honoured

Multiple comments were received from those who had not provided a response to the 'closed' question. These recognised the potential issues associated with the idea of giving people a right to choose a specific area in which to live.

Setting realistic expectations

Local authorities noted that it may not be realistic to give people a right to access housing in their preferred location within a local authority. In particular, local authorities cautioned against 'raising hopes' that commitments could be honoured only to later realise that it is not achievable to provide the homes and services in people's desired localities. It was noted that this could have a negative impact on individuals and might undermine public trust. When sharing their concerns that such a measure would result in setting unrealistic expectations, local authorities noted the following:

- the lack of available housing stock was cited both by local authorities and landlord associations, who emphasised the lack of growth in the number of private rented sector properties available, in a context of increasing demand
- the concern was prominent in rural local authorities, for instance Monmouthshire, where PRS housing stock is very low
- local authorities foresaw the measure would set unrealistic expectations for social housing tenants in particular

- respondents reflected on unintended consequences which could arise as a result of the proposal, including the potential increase in waiting times as households remain in temporary accommodation for longer, waiting to be rehoused in a specific area
- this was seen to be a particular risk in compromising abilities to discharge the homelessness duty, should levels of demand become unmanageable in particular areas (preventing rapid rehousing 'at even the most basic of levels')

Local connection

Several respondents shared answers based on the interpretation that the question sought views about the requirement for local connection in local authority housing allocations, rather than offering choice within local authority areas. These views reflected on the importance of vulnerable individuals being able to access adequate housing outside of the local authorities to which they are connected, in order to improve their life circumstances. Some respondents considered the impact of those without local connection compromising community cohesion in predominantly Welsh speaking areas.

Question 4: Should elements of the adequate housing framework apply to the owner-occupied sector?

Question four asked respondents to consider whether the housing adequacy framework should apply to the owner-occupied sector. A large majority of people in Wales live in owner-occupied accommodation, with the sector representing an estimated 70% of all dwellings in Wales. The question presents examples where owner-occupied housing does not meet the criteria of the adequate housing framework, and the potential implications of this.

Table 3.5: Sentiment analysis of answers to question 4

Response	No. of respondents
Yes	54
No	45
Don't know	12
No View	143
Inconclusive	3
No Answer	22
Total	279

Source: Miller Research analysis of consultation responses

The majority of respondents to the consultation exercise stated that they held no view (143) or did not provide an answer to the question (22), or stated that they didn't know or gave an inconclusive response (15). This suggests that issues relating to owner-occupation did not have relevance for many individual respondents, including for people who responded as part of the ACORN campaign. Of the respondents who provided a conclusive view, views were split relatively evenly. 54 respondents were of the view that the housing adequacy framework should apply to the owner-occupied sector, while 45 respondents held the opposing view.

Table 3.6: Responses to question 4 by stakeholder group

Stakeholder Group	Yes	No	Don't know	No View	Inconclusive	No answer (-)	Total
Academic	1						1

ACORN Campaign				128			128
Charity and third sector	12			3	1	4	20
Housing sector						2	2
Individual	23	38	12	12		11	96
Local authority	8	1			2	1	12
Private sector	2	4				4	10
Public sector	5						5
Representative body	3	2					5
Total	54	45	12	143	3	22	279

Source: Miller Research analysis of consultation responses

Charities and the third sector, as well as local authorities, broadly supported the idea that the framework should apply to owner-occupiers. Individual respondents were broadly not supportive.

Q4i: If so, how can this be made to work in practice and what issues require further consideration?

Many of those in support of applying the framework to the owner-occupied sector responded from an equalities perspective, emphasising that adequate housing should be the ambition for all tenure types across Wales. In support of their answers, responses also:

- highlighted the specific elements of the framework which they felt to be most relevant to owner-occupiers
- shared evidence regarding the social costs of inadequate housing, and
- specifically referenced the issues of energy efficiency and fuel poverty.

Fuel poverty and energy efficiency

Eight respondents discussed energy efficiency in their answers, though general references to EPC ratings were also made in broader monitoring and enforcement considerations by a further 15 respondents. Care and Repair Cymru cited concerns regarding older owner-occupiers who are unable to heat their homes, and suggested that this group are the most likely to suffer from fuel poverty (which is a consequence of low-income combined with living in older, less efficient properties). National Energy Action Cymru quoted that approximately 13% of owner-occupiers are estimated to be living in fuel poverty, low income households

such as households where one or more residents has a long-term health condition or disability, are likely to be disproportionately affected by changes made through policy change and increased rents.

Observations were also made surrounding the alignment between the Welsh Government's Fuel Poverty Plan, as well as decarbonisation efforts, with the suitability of applying standards to the owner-occupied sector. It was noted that targets have been set which aim to reduce fuel poverty to the extent that no households are to living in severe or persistent fuel poverty, and that no more than 5% of households are to be living in fuel poverty at one time. It was noted that these ambitions may be difficult to achieve without considered efforts to improve owner-occupied housing.

Similarly, it was felt that the criteria for habitability would have implications for the environmental impact of housing stock, and that decarbonising sources of domestic heating would have to be considered. A separate reference was made to the Warm Homes Programme, which was not viewed as an effective solution for older people who do not want an air source heat pump. Here it was suggested that a right to adequate housing would incentivise better research and investment in the owner-occupied sector, on decarbonisation and behaviour.

Housing adequacy for all

Eight respondents also considered that the application of the framework to the owner-occupied sector would be consistent with a strategic approach to housing, across all tenure types. Comments suggested that this would help to ensure all housing stock is brought up to the right standard in the event that owner-occupied properties change use and enter the private rented sector. This approach was also said to be appropriate as the cost-of-living crisis has impacted people living in all housing tenures . There was also an observation that choosing not to apply the framework to owner-occupied homes would compromise the overall impact of the approach, as owner-occupied properties make up 70% of Wales' housing stock.

Public health and social costs

The social costs of inadequate housing for the owner-occupied sector was cited, with Citizens Advice Cymru estimating that the impacts of poor housing on healthcare and homelessness services can generate £1billion in additional costs. Some respondents reflected on the implications of poor housing (particularly damp and mould) on public health and on the limitations inaccessible homes place on elderly residents who wish to live independently.

It was also highlighted that the most common referrals for poor housing conditions from adult social services are for older owner-occupiers in cold and damp properties. Concern was expressed surrounding the number of deaths among people aged 75 and older caused by excess cold . Respondents drew on these considerations to evidence the need for a more strategic approach to addressing fuel poverty, inefficient and inhabitable homes, which they felt could be addressed through the application of the framework to owner-occupied properties.

Opposition to the idea

Alternatively, those who opposed the idea of applying the framework to the owner-occupied sector highlighted the independent position of owner-occupiers. The view was put forward that owner-occupiers shouldn't be subject to regulation. It was suggested that the adequacy and condition of housing is already established at the point of sale (e.g. through building surveys).

Nine respondents (7 individual respondents, 2 representative bodies and one respondent from the private rented sector) expressed concerns about the implications of 'control' through the application of the framework to owner-occupiers, and in some cases this was framed as infringement on individual decision-making. Others questioned the effectiveness of Government both in 'enforcing' new measures and regulations, and in managing unintended consequences for the private rented sector.

Issues for further consideration

Those who were not in favour of applying the framework to owner-occupiers, or did not provide a definitive answer to the proposal, raised a number of issues, including concerns regarding:

- who would meet the costs of making the improvement necessary, and where these costs would be 'passed on'
- what would happen to the housing stock that 'fails' the framework
- what would happen if finances were not available to address an 'inadequate' classification
- whether it would be appropriate for the government to provide funding for private rented sector landlords, given that this could have the result of increasing the value of privately owned assets

Monitoring and enforcement considerations

Some respondents referred to the fact that there is existing legislation that is relevant in the context of this consultation question. For example, reference was made to the Housing Act 2004 and to the Health and Safety Rating System (HHSRS) tool, which could be used to address disrepair where there is a risk to public health. Similarly, the Fitness for Human Habitation Regulations were presented as providing a standard that could be applied, focusing on key issues such as dampness, structural safety, and fire hazards.

Solutions

Respondents were in agreement surrounding the need to support owner-occupiers to identify, access, and expand provision of grant funding schemes to improve the standards of their properties. Solutions to support owner-occupiers to manage the changes in standards included the following suggestions:

- implementing policies to improve the EPC of new and existing housing stock and to decarbonise sources of domestic heating

- application of adequate space criteria (minimum floor area requirements for different room types and dwelling sizes) to new builds so that new stock is built but without compromising on quality
- considerations for safeguarding children would need to be factored into enforcement processes
- use targeted strategic area-based schemes to review all households in a particular area regardless of tenure type
- the HHSRS assessment tool should be used to assess standards across all tenures
- the Welsh government to establish mechanisms that respect private ownership whilst ensuring compliance with basic standards

Question 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?

Question 5 asked respondents to consider whether producing a housing strategy would support access to adequate housing for people in Wales. The White Paper set out that legislation could be made that places a duty on Welsh Ministers to publish a housing strategy within a defined timescale.

Table 3.7: Sentiment analysis of answers to question 5

Response	No. of respondents
Yes	177
No	50
Don't know	9
No View	1
Inconclusive	4
No Answer	38
Total	279

Source: Miller Research analysis of consultation responses

Table 3.8: Responses to question 5 by stakeholder group

Stakeholder	Yes	No	Don't know	No View	Inconclusive	No answer (-)	Total

Group							
Academic		1					1
ACORN Campaign	128						128
Charity and third sector	9					11	20
Housing sector						2	2
Individual	29	45	9	4		9	96
Local authority	4				1	7	12
Private sector	3	3				4	10
Public sector	3					2	5
Representative body	1	1				3	5
Total	177	50	9	4	1	38	279

Source: Miller Research analysis of consultation responses

A majority of respondents (including the ACORN campaign) who provided a conclusive response to this question (177) believed that placing a requirement on Welsh Ministers to produce a housing strategy would help progress towards ensuring access to adequate housing for people in Wales. Almost a quarter of respondents who provided a conclusive response were of the opposing view. Around a quarter of all respondents to the consultation exercise indicated that they either didn't know or had no views, or provided an inconclusive answer or no answer. This included several third sector organisations and local authority representatives. These responses typically did not provide detail regarding why they had chosen to answer in this way.

Q5i: Please explain your reasoning.

Key themes

Broadly, respondents who agreed that producing a housing strategy would support progress towards adequate housing in Wales welcomed the direction and guidance that a strategic approach would provide. It was perceived that this would help to communicate expectations at the national level and set out the roles of all stakeholders involved in delivery.

Coordination and efficiency

Improved coordination and efficiency were prominent themes, with stakeholders acknowledging the importance of assisting local authorities to allocate their resources

strategically. Many respondents believed that a strategy produced by Welsh Ministers would help to foster cohesion in the sector and lead to greater coordination and efficiency. A longer-term strategy would allow stakeholders to work towards a common goal or set of standards in a more cohesive way.

Direction and policy clarity

A clear and well-defined housing strategy could provide essential direction by setting priorities, guiding decision-making, and ensuring efficient resource allocation based on objective needs.

Twelve respondents suggested that a housing strategy should set out the current and future governments' long term housing priorities. These could include the development of new homes, areas of infrastructure investment, decarbonisation and compliance requirements. According to these respondents, the core standards should be progressive and set on a national level.

Improving quality of life

Some respondents thought that a housing strategy could help to improve provision in the sector, leading to general improvements in quality of life, strengthened communities, greater pet ownership rights, better health and wellbeing outcomes, and reduced overcrowding.

Caveats

Seventeen respondents provided a number of caveats in association with introducing a housing strategy. The points raised included:

- the Welsh Government would need to justify any changes to its policies if the approaches presented as a part of a new strategy represented a change in approach
- the strategy should be assessed periodically and updated as necessary, with appropriate legislative and financial mechanisms put in place to ensure this is possible
- without proper enforcement, the strategy risks becoming meaningless. Respondents instructed that local housing strategies should align with national objectives
- broad strategic focus – the document should contain only high-level goals, such as increasing affordable housing, without providing excessive detail
- existing strategies & implementation delays – given the numerous existing policies, adding another strategy may delay governmental action
- Impacts some responses suggest that a Welsh Government strategy might be too burdensome for landlords and increase operating costs which would have to be passed down to the renter
- Some respondents expressed deep concern with the government's willingness to interfere in the market, suggesting that this may inadvertently have detrimental

effects, with one respondent suggesting that attempts to increase standards could force landlords out of the market.

- Eight respondents expressed deep concern with the government's willingness to interfere in the market and indicated a lack of public trust in the political system, questioning the abilities and competence of officials (suggesting that Ministers are unlikely to listen to the sector through this consultation) suggesting that this may inadvertently have negative effects on the sector as a whole.
- Several respondents emphasised the unintended/negative consequences that could be produced as a result of a housing strategy, expressing that 'more landlords will sell, we already feel we are losing control of our investments'
- Other unintended consequences included adding delays to the building of new homes, and increased costs for people in Wales (though where costs would be incurred was not specified)

Finally, some respondents expressed disappointment and the sentiment that the White Paper doesn't go far enough. They note that the White Paper does not propose making legislation that would introduce a right to adequate housing in Welsh law and they suggest Welsh legislators should be 'more ambitious' in their aims.

Question 6: Should there be a requirement on Welsh Ministers to draw on the seven factors of housing adequacy when drafting the strategy?

Question 6 asked respondents to consider whether a housing strategy should be underpinned by the seven factors of housing adequacy.

Table 3.9: Sentiment analysis of answers to question 6

Response	No. of respondents
Yes	194
No	33
Don't know	11
No View	4
Inconclusive	13
No Answer	24
Total	279

Source: Miller Research analysis of consultation responses

Table 3.10: Responses to question 6 by stakeholder group

Stakeholder Group	Yes	No	Don't know	No View	Inconclusive	No answer (-)	Total
Academic	1						1
ACORN Campaign	128						128
Charity and third sector	15				1	4	20
Housing sector	2						2
Individual	28	31	11	11	1	14	96
Local authority	10				1	1	12
Private sector	3	2		1		4	10

Public sector	4				1		5
Representative body	3			1		1	5
Total	194	33	11	13	4	24	279

Source: Miller Research analysis of consultation responses

The majority of respondents (194) agreed that it would be appropriate to draw on the seven factors. Charity and third sector organisations, public sector and local authorities (where a yes/no answer was provided) agreed this would be beneficial when drafting the strategy.

For this question ACORN responses believed there should be such a requirement as drawing on the seven factors of housing adequacy could force Ministers to consider the needs that Welsh residents have for housing that is secure, affordable, accessible and safe, rather than focusing on things like building volume or developer viability.

Q6i: Please explain your reasoning.

Key themes

Those that agreed felt that this provided an important foundation for the strategy. For example, Monmouthshire County Council stated that “drawing on the seven factors of housing adequacy will tie us into the international framework and be measurable by the way of the core minimum standards”.

Improving accountability

Respondents in favour of drawing on the seven factors believed that Welsh Ministers need to draw from these in all aspects of housing policy and actively enforce the principles of the seven factors at a national level in order to fairly expect local authorities to enforce the new standards at a local authority level. They also believed the use of the seven factors will produce a clear framework that is fit for use.

Foundational step

A range of respondents (4 individual, 3 local authorities, 1 charity and 1 representative body) felt that the seven factors offer a strong starting point for policy formation and measuring housing adequacy in practice. To be effective, the strategy should reflect these factors fundamentally in its outcomes and provide a long-term direction that bridges future government terms. It should be underpinned by a financial commitment exceeding the current 4.6% of the government budget to meet housing targets and aspirations. While flexibility is required to accommodate local circumstances, the strategy must embed the progressive realisation of adequate housing as put by one response the ‘golden thread’ throughout policy decisions.

Responsibility

There was a perception among some respondents that use of the seven factors will result in landlords being held responsible for ensuring housing is adequate. Some respondents believed that this is a good opportunity for the Welsh Government to display its commitment to improving access to adequate housing.

Some respondents believed that as democratically elected politicians, Ministers have the responsibility to do what is best for all the people of Wales, including renters, landlords and private homeowners. Suggestions included:

- landlords need to be vetted thoroughly, and their properties inspected to ensure they meet a high standard
- the government needs to demonstrate its commitment to ultimately realising a universal right to adequate housing
- the fullest possible account should be taken of the needs of the most disadvantaged people

Further considerations

Some of those who support the adoption of the seven factor framework also went on to note further considerations that could ensure the strategy has a balance of flexibility and clear objectives that are aligned to the economic, social and environmental goals of the government. These included:

- encouraging mixed housing as this can enhance social mobility and market-driven improvements
- increased investment in social housing
- the need for better support for vulnerable tenants
- retrofitting programs for energy efficiency
- transparency in rent spending
- stronger anti-discrimination measures
- the need for legislation that protects the rights of landlords, so that a tenant can be evicted should they prevent compliance with any of the seven factors
- the need to develop a flexible strategy that can respond to changing circumstances
- the need to develop clear objectives, ensuring the strategy meets its stated goals and aligns with broader economic, social, and environmental objectives

Risks

Some respondents highlighted that the strategy must reflect the factors of adequate housing or the strategy risks neglecting or deprioritising those who are in most need of the strategy. However, responses also argued that it may be unwise to pin all objectives and work on purely delivering the seven factors, as other issues may be forgotten.

Too bureaucratic

Those that disagreed with use of the factors elaborated that this stemmed from their disagreement with the factors in principle, disapproved of market interference, or were unable to see how the factors could be applied as a 'one size fits all' approach.

As with the previous questions, this question also prompted responses suggesting that implementing this framework would be too bureaucratic for landlords to do their jobs effectively. They also suggest that Welsh Ministers lack the necessary experience to draw up housing standards and a renting policy due to their lack of experience in the sector.

Question 7: How often should Welsh Ministers be required to review the strategy?

This question asked respondents whether Welsh Ministers should be required to review the strategy, and if so, with what level of regularity. The options offered included there being no such requirement, and time options ranging from annually to every 4-5 years.

Table 3.11: Sentiment analysis of answers to question 7

Response	No. of respondents
Every year	143
Every 2-3 years	21
Every 4-5 years	42
There should be no such requirement	30
Don't know	7
Inconclusive	5
No view	7
No answer	24
Total	279

Source: Miller Research analysis of consultation responses

Table 3.12: Responses to question 7 by stakeholder group

Stakeholder Group	Every year	Every 2-3 years	Every 4-5 years	No requirement	Don't know	Inconclusive	No view	No answer	Total
Academic		1							1
ACORN Campaign	128								128
Charity and third sector	2	5	5			1	4	3	20

Housing sector			2						2
Individual	12	9	23	28	7	4		13	96
Local authority		4	5				1	2	12
Private sector	1	1	2	2				4	10
Public sector		1	4						5
Representative body			1				2	2	5
Total	143	21	42	30	7	5	7	24	279

Source: Miller Research analysis of consultation responses

The majority of respondents who provided a response to this question (206, including the 128 ACORN campaign respondents) stated that there should be a requirement on Welsh Ministers to review the strategy periodically. Only a small minority (30 respondents) stated they didn't believe such a requirement should be placed on Welsh Ministers. 43 respondents out of the 279 did not provide a conclusive view or noted that they didn't hold a view on this issue.

The most commonly cited time period in response to this question was an annual review of the strategy with 143 respondents, including the 128 ACORN campaign responses, suggesting an annual review. Responses which disagreed with the idea of placing a requirement were broadly consistent with responses to question 6 both in tone and content.

The level of explanation provided by those who selected the 4–5-year option was the most extensive.

Q7: Please explain your reasoning.

No Requirement

Those who did not believe that ministers should be subjected to this requirement argued that mandatory reviews on a fixed schedule are counterproductive. They contended that the strategy should be reviewed only when necessary, rather than on rigid timelines. They suggested that this approach would avoid imposing additional costs and bureaucratic burdens on property owners - costs that are ultimately passed on to renters due to increased government involvement. Moreover, they emphasised that the focus should be on boosting the housing supply rather than on processes that delay meaningful change and

add needless administrative overhead. Instead, that pressure for change should come directly from the public engaging with their elected representatives, not from predetermined review cycles that risk creating an additional procedural cost.

Annually

Those who supported an annual review emphasised the importance of regular oversight and ensuring Ministers can respond and adapt to changes. The strength of annual review periods was also perceived to support a focused and evidence-based approach to the strategy. Regular reviews were seen to be essential to respond to economic shifts, global influences like migration, and developments in the housing sector. Annual reviews could support scrutiny and provide the government with a basis for addressing any flaws in its plans.

Several respondents thought that an assessment conducted by the Welsh Government officials with briefings to the Minister paired with an in-depth review of the sector and housing adequacy standards should occur at least once per Senedd term. This approach would measure progress and review whether the Welsh Government was on track to meet its objectives. Regular assessments, including annual progress updates, would enhance transparency, accountability, and the ability to take corrective action, ensuring the strategy remained effective and responsive.

2-3 years

Limited comments were provided to support the 2-3 years option, although this appeared to be selected as an intermediary response which balanced the demands of reporting too frequently, against reporting not frequently enough. For example, the Bevan Foundation pointed to the impacts of circumstances in recent years (including the pandemic and cost of living crisis) on the housing market, and the needs of low-income individuals.

Respondents felt semi-regular (2-3 year) reviews could allow for necessary adjustments, provide accountability, and ensure that the strategy responds flexibly to significant changes in housing needs. They suggested that a mid-term review within a five-year strategy would allow for timely interventions, ensuring decisions are based on up-to-date data and emerging challenges are addressed. This approach would balance the long-term nature of housing policy with the need for adaptability, facilitating scrutiny by the Senedd and enabling local authorities to implement necessary changes effectively.

4-5 years

This approach was viewed by respondents as balancing the need for consistency with the flexibility to adapt to major changes, such as economic shifts or global events. Responses pointed out that a 4-5 year review cycle also aligns with the Senedd term, ensuring the strategy remains relevant while allowing time for meaningful progress in housing delivery.

Those who favoured the 4-5 year option perceived the strategy as a long-term consideration and provided the following rationale to support their answers:

- some felt that too frequent reviews (and consequential changes) would be unmanageable, and that longer timescales would support consistency of application

- there was also some consideration that there would be little perceptible change to reviews if conducted on an annual basis and that 4-5 year time periods give time to deliver change

Presenting a compromise, some who favoured the longer review period considered the possibility of interim assessments to monitor progress and identify emerging issues. One respondent referenced local authority review requirements as part of Local Market Housing Assessments,⁶ which stipulate no longer than 4-5 years as a review period, but integrate a flexible approach to review sooner in the event of significant changes. This respondent explained that the pandemic and Ukraine-related resettlement programmes are relevant examples in this context.

⁶ Local Market Housing Assessments (LHMAs) are reviews conducted to provide an overall additional housing need estimate at the local authority level by aggregating Housing Market Area (HMA) level need and a description of the specific housing need requirements. LHMAs are conducted by local authorities in Wales every 4-5 years and form a part of the evidence base for preparing Development Plans and local authorities' Local Housing Strategies.

Question 8: How often should Welsh Ministers be required to report on progress on delivery of the strategy to the Senedd (Welsh Parliament)?

Question 8 asked respondents to consider how often Welsh Ministers should be required to report on the delivery of the strategy to the Senedd.

Table 3.13: Sentiment analysis of answers to question 8

Response	No. of respondents
Every year	178
Every 2-3 years	15
Every 4-5 years	13
There should be no such requirement	26
Don't know	5
Inconclusive	5
No view	7
No answer	30
Total	279

Source: Miller Research analysis of consultation responses

Table 3.14: Responses to question 7 by stakeholder group

Stakeholder Group	Every year	Every 2-3 years	Every 4-5 years	No requirement	Don't know	Inconclusive	No view	No answer	Total
Academic	1								1
ACORN Campaign	128								128
Charity and third sector	8	3	1			2		6	20

Housing sector	2								2
Individual	26	9	11	24	5		7	14	96
Local authority	7		1			1		3	12
Private sector	3	1		2				4	10
Public sector	2	2						1	5
Representative body	1					2		2	5
Total	178	15	13	26	5	5	7	30	279

Source: Miller Research analysis of consultation responses

Q8i: Please explain your reasoning.

Responses to this question were broadly similar to that of question 7 (relating to the review period). However, supporting comments for annual reporting placed a more explicit focus on prioritising housing policy and accountability.

It was also felt that this would improve scrutiny and visibility of the strategy, supporting local authorities to understand how the Welsh Government intended to achieve targets.

Every year

Most respondents believe an annual report on the housing strategy is essential to ensure accountability, transparency, and progress tracking. They suggested that regular reporting to the Senedd would keep the issue at the forefront of policy discussions, providing opportunities for the Government to receive constructive criticism and enabling timely corrective actions if needed. It would also allow benchmarking against agreed indicators and aiding service delivery while ensuring the Welsh Government remains accountable.

Regular monitoring would ensure that policy momentum is maintained, allowing for adjustments to prevent any negative impacts. It was felt that frequent reviews would be necessary to measure the strategy's effectiveness, address shortfalls, and provide reassurance to residents. people.

Every 2-3 / 4-5 years

Similar to question 7, several respondents thought that a 2-3 year or a 4-5 year reporting frequency would allow more time for effects to fully materialise, providing higher efficiency in use of Ministers' time and effectiveness of their consequent decision making.

No views / There should be no such requirement

Some respondents thought that this would be a waste of time/money and would bring unforeseen consequences, especially to renters through forcing the hand of landlords to increase rents to deal with increased workload and added stress. One respondent thought that it wouldn't matter how often Ministers would be required to report on progress as the proposition doesn't go far enough and wouldn't tackle the problem from the roots but rather only mitigate the issues.

Some wider comments were shared on the reporting process in general, including:

- The risk that the housing service could suffer if reporting timescales are inadequate
- The need to state a commitment to reporting on progress and the provision of resources to deliver outcomes in order to maintain accountability
- Acknowledgement that the regularity of reporting would be dependent on what the process looks like and how long it would take to complete.

Question 9: Do you agree rent data should be collected at a local level by Rent Smart Wales (e.g. ward or postcode)?

Table 3.15: Sentiment analysis of answers to question 9

Response	No. of respondents
Yes	200
No	46
Don't know	13
No view	0
Inconclusive	1
No Answer	19
Total	279

Source: Miller Research analysis of consultation responses

Table 3.16: Stakeholder sentiment analysis of answers to question 9

Stakeholder Group	Yes	No	Don't know	No View	Inconclusive	No answer (-)	Total
Academic	1						1
ACORN Campaign	128						128
Charity and third sector	13	1				6	20
Housing sector	1					1	2
Individual	35	40	13			8	96
Local authority	10					2	12
Private sector	5	2			1	2	10
Public sector	5						5

Representative body	2	3					5
Total	200	46	13	0	1	19	279

Source: Miller Research analysis of consultation responses

The ACORN Campaign (128), the majority of charity and third sector partners (13), local authorities (10), public sector stakeholders (5) and private sector stakeholders (5) were in favour of proposals for RSW to collect data at a local level. Respondents in favour expected that more local data would enable more effective policy interventions including local housing allowance (LHA) setting and suggested that RSW is best placed to collect this data. Views from individuals were more mixed with the majority of them (40) disagreeing with the proposals. It was suggested this would be 'unnecessary' intervention in the private rented sector market to collect data that would be either duplicated elsewhere or lack sufficient detail regarding property type and condition to be helpful. Individuals were also concerned regarding the potential cost to taxpayers and landlords or managing agents regarding the undertaking of what is viewed as additional data collection and 'red tape'.

Q9i: Why?

Key themes

Responses to this question were divided between those who supported local rent data collection by RSW and those who opposed it. The arguments in favour of local data collection focused on how access to more localised data could improve policy effectiveness particularly around LHA setting and supporting more localised policy interventions in the private rented sector, empower tenants to challenge potentially unfair rent increases or to choose properties or areas to live based on more localised information, and increase market transparency to support scrutiny by policy makers, third sector organisations and journalists. Arguments against the proposals included concerns around efficiency and potential duplication of existing data, the cost and resources associated with RSW collecting such data as well as the time and cost burden on landlords in the private rented sector, and market interference into what is viewed as a private and confidential agreement between landlords or managing agents and their tenants.

Many respondents argued that existing data sources on rental prices are inadequate, including averages based on advertised rents through rental platforms such as Zoopla or Rightmove, or data based on historic rents that are not available to new tenants or unavailable at a sufficiently local level to be useful to support policy intervention.

Six respondents suggested that RSW would be the best-placed organisation to undertake this data collection due to its existing role in the private rented sector. This was caveated however, by the observation that RSW would need to be sufficiently resourced to take on this additional responsibility and would need to be clear about the rationale for this data collection.

Suggested benefits

Supporters of the proposal viewed this as an opportunity for the private rented sector to become more active and informed in their rent-setting through access to more localised data as well as enabling more regulated oversight of the sector by RSW, local authorities and other relevant parties.

Multiple respondents (7) who agreed with the proposals also suggested that the data could be instrumental in improving evidence-based policymaking, allowing for more targeted interventions, such as enabling Local Housing Allowance (LHA) rates to be set at rates that more accurately reflect actual rent prices in different local areas.

There was also a tenant empowerment argument, where respondents indicated that having a clear data monitoring mechanism would empower existing tenants to challenge unfair rent increases or make informed decisions regarding the properties or local areas in which they would want to rent. By making rental price trends more transparent, respondents felt that future initiatives could be better designed to ensure affordability of rents while still giving landlords a fair return on their investment.

Opposition to Rent Data Collection by RSW

Opponents of the proposal focused on three main areas: practicality, cost, and market principles. Some argued that annual collection of rental data is unnecessary, either because data is already available elsewhere or because the market should dictate rent levels 'organically'. Others believed that RSW is not the right body to collect this data, and that such an initiative would lead to inefficiencies and increased running costs, resulting in a waste of public resources.

Another key concern amongst respondents who disagreed with the proposal was the potential burden on landlords. Some respondents warned that mandatory data reporting would increase administrative workloads and could risk reduced 'profit margins' for landlords due to increased administration costs and the pressure to keep rents low. There was also uncertainty regarding the rationale or desired benefits of enhanced data collection, with respondents pointing to existing data sets that could provide similar data or noting that the data collected would still be limited in terms of its ability to account for different property types or lower rents offered by landlords to retain 'good tenants'. The National Residential Landlord Association highlighted that increases in rent tended to occur in between tenancies, rather than during, limiting the usefulness of the data. With this in mind, it was also suggested that collecting data on an annual basis may not offer the most effective approach.

Some respondents suggested there could be unintended consequences that arise as a result of collecting rent data at this level, such as landlords using the collected data to justify increasing rents to match perceived market norms, leading to higher overall rent prices instead of improved affordability. This concern is reflected in the original White Paper which considers this concern and reflects that this would be a low risk given that "there is currently no clear understanding of what the "local market" rent is, nor is such rent data easily

obtainable by current or prospective renters”⁷. One respondent also expressed concern that data availability at a local level in smaller local areas could lead to privacy and safety concerns for landlords as a result of private commercial data being made available publicly. This concern is reflected in the original White Paper which states that “Any individual rent data must be treated as commercially sensitive and not form part of the public register or be disclosed upon request through Freedom of Information requests”⁸.

⁷ Welsh Government (2025) *Consultation on the White Paper on securing a path towards Adequate Housing, including Fair Rents and Affordability*. Page 48. Available at: [Consultation on the White Paper on securing a path towards Adequate Housing, including Fair Rents and Affordability](#)

⁸ Welsh Government (2025) *Consultation on the White Paper on securing a path towards Adequate Housing, including Fair Rents and Affordability*. Page 50. Available at: [Consultation on the White Paper on securing a path towards Adequate Housing, including Fair Rents and Affordability](#)

Question 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?

This question asked respondents to identify any additional principles or objectives that should be considered in how rent information is provided to RSW. The responses referred to a range of considerations aimed at enhancing the effectiveness, accuracy, and transparency of rent data collection while ensuring minimal burden on landlords.

The key considerations aligned with the broader aims outlined in the consultation, which seek to improve affordability and quality in the private rented sector in Wales. Respondents emphasised the need to leverage existing data sources, ensuring data accuracy, protecting privacy, minimising costs, and aligning rent data collection with market conditions.

Key Themes

Leveraging existing data

Seven respondents suggested that the Welsh Government should utilise existing data sources to avoid duplication and enhance efficiency. Respondents suggested that this approach would streamline data collection and reduce compliance burdens for landlords.

Potential sources included:

- Universal Credit records held by the Department for Work and Pensions (DWP)
- rental platform data (e.g., Rightmove, Zoopla)
- data collected by letting agents and property firms

Data accuracy

Five respondents highlighted the importance of accurate and up-to-date rent data.

Key considerations included:

- differentiating between advertised rents and actual rents paid
- accounting for rental price fluctuations within tenancies due to property degradation or improvements
- collecting data at a local level (e.g., ward or postcode level) to inform policy decisions
- integrating rent data into broader housing market analyses to enhance transparency and effectiveness

Privacy and commercial sensitivity

Four respondents emphasised the importance of safeguarding personal and commercially sensitive data.

Suggestions included:

- ensuring rental data is not publicly accessible in order to avoid tenant-landlord conflicts
- implementing strict data governance policies
- using anonymised data aggregation methods to balance transparency with privacy
- providing reassurances on data management and usage policies

Minimising costs

Small-scale landlords expressed concerns about compliance costs and administrative complexities. Three respondents stressed the need to integrate rent data collection with existing processes to reduce costs and administrative burdens.

Recommendations included:

- linking rent data submission to the landlord licensing process
- enabling electronic reporting systems for streamlined data submission
- allowing third-party software integration via APIs for automated reporting

Market conditions

Two respondents raised concerns related to the broader rental market and policy implications.

Specific issues highlighted included:

- the potential for rent controls to discourage investment in the private rented sector
- the need for transparent rent regulation criteria, such as inflation-linked rent caps
- the importance of addressing rental affordability through supply-side interventions
- the need to align rent data collection with market realities to develop balanced housing policies

Some stakeholders suggested that historical rent data publication could improve tenant decision-making.

The additional principles and objectives identified in the consultation responses provided valuable insights for developing robust rent data collection under RSW. It was suggested that by leveraging existing data, ensuring accuracy and privacy, minimising costs, and aligning with market conditions, these principles could support the overarching goals of the consultation. Implementing these considerations would also aid evidence-based decision-making and improve housing affordability in Wales.

Question 11: Do you think spatial mapping of amalgamated rent data is useful and should be made publicly available?

Table 3.17: Sentiment analysis of answers to question 11

Response	No. of respondents
Yes	191
No	42
Don't know	19
No View	0
Inconclusive	3
No Answer	24
Total	279

Source: Miller Research analysis of consultation responses

Table 3.18: Stakeholder sentiment analysis of answers to question 11

Stakeholder Group	Yes	No	Don't know	No View	Inconclusive	No answer (-)	Total
Academic	1						1
ACORN Campaign	128						128
Charity and third sector	12				1	7	20
Housing sector	2						2
Individual	28	38	19			11	96
Local authority	10					2	12
Private sector	6	2				2	10
Public sector	3					2	5

Representative body	1	2			2		5
Total	191	42	19	0	3	24	279

Source: Miller Research analysis of consultation responses

Overall the proposal to make spatial mapping data publicly available was largely supported by charity and third sector respondents (12 agreed) , local authority respondents (10 agreed) , private sector respondents (6 agreed) and public sector respondents (3 agreed) and housing sector respondents (2 agreed) with arguments from these stakeholders largely focusing on measuring policy progress towards achieving fair rents, empowering tenants with information to challenge unfair rent increases and enhancing levels of transparency in the private rented sector. However, views from individual respondents were more mixed; 38 respondents disagreed with the proposals, with arguments focusing on the unclear rationale for the proposal, the risk of duplicating existing data and potential limitations of the data that is proposed to be collected, as well as similar objections regarding the interference in the private rented sector market.

This question highlighted the tension between transparency and privacy. While some saw tenant empowerment and improved policymaking as potential benefits arising from publishing rent data, others feared privacy risks and market distortions.

Q11i Why?

Key themes

Respondents in favour of spatial mapping argued that making rental prices publicly available would help empower tenants by enabling them to challenge unfair rents. Some viewed the availability of spatially mapped local data as a tool to help tenants relocate to more affordable areas. Other respondents noted that spatial mapping would improve policymakers' and housing professionals' understanding of local rental markets.

Another key theme was enhancing transparency and accountability. Respondents believed that journalists, advocacy groups, and other stakeholders could use this data to scrutinise rental trends, hold landlords accountable and assess progress toward policy goals regarding fair rents.

Opponents raised concerns that such data could be misleading or misused. For example, rental mapping may fail to account for reasons why rents are lower in some areas, for example because landlords offer discounted rents to support local workers, to account for varying property types and conditions or to retain 'good tenants'. Other respondents worried that landlords' identities could be inferred from the data made available publicly, creating privacy and safety risks.

Another concern was limited practical benefits. Some respondents believed that existing platforms like Zoopla already provide sufficient market data and that without broader affordability measures – including addressing the supply of housing available locally – the public availability of spatially mapped local rent data alone would not improve affordability.

There were also concerns about data discrepancies and duplication with other government datasets including the UK Land Registry or data held by local authorities.

Question 12: Do you think there should be a mechanism to challenge a rent increase?

In response to Question 12, a majority of respondents supported the introduction of a formal mechanism to challenge rent increases (191). The considerations below align with the broader aims outlined in the consultation, which seeks to improve the affordability and quality of private rented sector housing in Wales while ensuring fair and balanced regulatory interventions.

Table 3.19: Sentiment analysis of answers to question 12

Response	No. of respondents
Yes	191
No	50
Don't know	11
No View	0
Inconclusive	2
No Answer	25
Total	279

Source: Miller Research analysis of consultation responses

Table 3.20: Stakeholder sentiment analysis of answers to question 12

Stakeholder Group	Yes	No	Don't know	No View	Inconclusive	No answer (-)	Total
Academic	1						1
ACORN Campaign	128						128
Charity and third sector	11				1	8	20
Housing sector		1				1	2
Individual	30	45	10		1	10	96
Local authority	12						12

Private sector	5	2	1			2	10
Public sector	2					3	5
Representative body	2	2				1	5
Total	191	50	11	0	2	25	279

Source: Miller Research analysis of consultation responses

Key Themes

Support for a challenge mechanism

194 respondents supported the introduction of a mechanism to challenge rent increases, citing concerns over unfair pricing and the potential risk of homelessness. The following reasons for this support included:

- current protections are insufficient to prevent exploitative rent increases
- excessive rent hikes can function as de facto evictions, leading to housing insecurity
- a formal challenge process could enhance market transparency and tenant stability

Suggestions were also made for a data-driven approach, similar to Scotland's rent determination system, where tenants can first seek a rent review before escalating the dispute.

Some respondents also supported publicly available rent data to improve market transparency and empower tenants to negotiate fair rental rates.

Concerns

Opposition to a rent challenge mechanism (cited by 50 respondents including 45 Individual respondents, 2 Private Sector respondents, 1 Representative Body and 1 Housing Sector organisation) was largely based on concerns over market forces and the financial pressures faced by landlords. This included comments that:

- rent increases are driven by rising costs, including mortgage rates, property maintenance, and regulatory compliance
- tenants have the option to leave if they disagree with an increase, meaning market competition naturally regulates pricing
- increased regulation could discourage investment in rental properties, reducing overall housing supply

It was suggested that instead of introducing a challenge mechanism, efforts should focus on reducing landlord costs through for example addressing mortgage rates and lenders, reducing government 'bureaucracy' and addressing the cost of maintaining properties, which could in turn reduce the need for rent hikes.

Unintended consequences

Several responses highlighted possible negative outcomes of introducing a challenge system, such as:

- landlords may set higher initial rents to avoid potential disputes
- stricter regulations could discourage property owners from renting out their properties
- the tribunal system could become overwhelmed, leading to long delays in resolving disputes

Comparisons were drawn to rent control policies in Scotland, where some claimed that restrictive measures had exacerbated rental shortages.

Existing mechanisms

Respondents noted that mechanisms such as rent assessment committees and tribunals already exist but may not be well-known or easily accessible to tenants. Suggestions for improvement included:

- increasing awareness of existing rent dispute processes
- simplifying procedures so tenants can navigate them effectively
- making rent challenge mechanisms more transparent and data driven

Fairness

Respondents emphasised the need for a balanced approach that considers both tenant affordability and landlord sustainability. Suggestions included:

- linking rent increases to inflation or local market rates to ensure fairness
- introducing a tiered challenge system, where rent hikes exceeding a set percentage automatically trigger a review
- fixing rents for longer periods, with adjustments allowed only at tenancy renewal, ensuring predictability for both tenants and landlords

Administration

Concerns over administrative burdens were raised, including:

- the potential for lengthy dispute resolution processes
- a high volume of challenges overwhelming tribunals and rent assessment bodies
- the need for clear guidelines to prevent frivolous disputes

Overall, the responses indicated strong support for a mechanism to challenge unfair rent increases, although concerns remained about market effects, administrative feasibility, and

regulatory balance. To align with the consultation's broader objectives, it was suggested that any proposed challenge mechanism should be designed to:

- protect tenants from exploitative rent increases and housing insecurity
- ensure landlords can maintain sustainable rental businesses
- minimise administrative burdens while providing a fair, transparent dispute process

Question 13: Do you think license holders should be required to complete an Annual Property Condition Record?

Question 13 asked respondents to consider whether license holders should be required to complete an Annual Property Condition Record.

Table 3.21: Sentiment analysis of answers to question 13

Response	No. of respondents
Yes	183
No	65
Don't know	13
No View	0
Inconclusive	2
No Answer	16
Total	279

Source: Miller Research analysis of consultation responses

Table 3.22: Stakeholder sentiment analysis of answers to question 13

Stakeholder Group	Yes	No	Don't know	No View	Inconclusive	No answer (-)	Total
Academic	1						1
ACORN Campaign	128						128
Charity and third sector	14				2	4	20
Housing sector						2	2
Individual	19	59	12			6	96
Local authority	12						12
Private sector	3	4	1			2	10

Public sector	4					1	5
Representative body	2	2				1	5
Total	183	65	13	0	2	16	279

Source: Miller Research analysis of consultation responses

Overall, charity and third sector (14), local authority (12) and public sector respondents (4) tended to agree with the suggested proposal that license holders should be required to complete an Annual Property Condition Record (APCR) with arguments in favour focusing on improved accountability for landlords regarding the property conditions and for potential improvements in the evidence base on property conditions in Wales. Alternatively individual respondents (59) and private sector respondents (4) largely disagreed with the proposal, pointing to the additional administrative burden on landlords, as well as concerns that the data collected would not necessarily be more accurate as APCR's could be falsified and that landlords who are not licensed would be exempt from these requirements.

Overall, the majority of respondents were in favour of license holders completing an APCR (183) with a minority disagreeing with the proposals (65). Arguments outlined for and against the proposals are outlined in further detail below.

Q13i: Why?

Key themes

Those who agreed with the proposal felt that this was an appropriate expectation in alignment with the housing adequacy framework. Suggested advantages of the requirement included:

- strengthening compliance: to mitigate hazards and ensure the right certificates and checks are in place to aid the enforcement of higher standards
- supporting transparency and public assurance: protecting tenants (from health and safety risks) as well as helping them to prove / cross-reference when and where damage to a property may have occurred to support tenants and wider local authorities to hold landlords accountable regarding the condition of their properties and risks to tenant health
- reducing administrative time associated with dispute resolution between landlords and tenants

However, the above support was caveated with the suggestion that the proposal would require additional resourcing of RSW, acknowledging that any checks RSW would be required to conduct on the APCR's would be labour intensive and would require adequate resource.

Those who were not in favour of the proposal, provided a broader range of supporting comments, with key considerations highlighted as follows:

- potential administrative burden for large scale property management and potential unintended impacts of landlords leaving the sector or increased costs incurred being passed on to tenants as increased rent
- time and cost implications including for RSW, which respondents suggested would need additional funding and resource to administer and would be viewed as a 'waste' of public resources
- others felt that it could damage the landlord/tenant relationship – favouring a personal approach to communicating issues including affecting the tenant's 'peaceful enjoyment' of the property
- some respondents expressed reservations regarding what would happen if the landlord could not gain access to their property to undertake the required checks
- some respondents also felt this risked duplication with existing data collection procedures, suggesting it duplicates the Renting Homes Act and could be tied to license renewal requests instead

Some respondents also cited potential unintended consequences of the proposal, including the capacity for information to be falsified by landlords if it was self-reported and not externally assured, as well as the risk of misuse of the APCR by tenants, to demand 'non-essential' changes. Respondents also highlighted that unlicensed landlords would be exempt from the proposal, which would limit its impact.

Question 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?

This question asked respondents whether an APCR should be introduced to assess property conditions on an annual basis. The supporting information provided acknowledged the importance of property maintenance and compliance with legal requirements but also noted concerns regarding the potential administrative burden and overlap with existing mechanisms. It therefore asked respondents to consider that whilst tracking property condition could improve standards, there were concerns about duplication and increased costs.

The question provoked a high level of engagement, prompting detailed responses from landlords, tenants, and housing organisations, who sought to evaluate the possible consequences of the proposal within the context of regulatory obligations and existing housing policies. A considerable number of blank/inconclusive responses were also observed in relation to this question, as the complexities in providing a decisive answer were acknowledged by respondents.

Whilst some tenants and housing advocacy groups were broadly in favour of this proposal from a tenant protection and quality assurance perspective, many landlords and property owners did not agree and raised concerns about increased costs, administrative burdens, and duplication of existing reporting requirements.

Key Themes

Ensuring property safety and compliance

The importance of maintaining property safety and compliance was a primary theme for those in favour of an APCR. Respondents referenced the need for regular safety inspections, including gas and electrical safety certificates, fire alarm checks, and compliance with Fitness for Human Habitation (FFHH) standards. Specifically, respondents highlighted that tracking structural integrity, damp and mould, insulation, and energy efficiency improvements could enhance housing quality. Other respondents highlighted concerns about the duplication of effort, particularly for landlords already complying with RSW and other regulatory requirements.

Inclusion of rent data

The inclusion of rent data received mixed responses with the ACORN Campaign, and other respondents supporting the inclusion of rent data to allow for the monitoring of market trends and affordability. Some other respondents while other expressed opposition to including rent data in the APCR, arguing that it is unrelated to property condition and already accessible through other channels. Respondents also raised concerns about additional government processing costs and the potential for unnecessary regulatory complexity..

Concerns about tenant and landlord responsibilities

Some respondents highlighted concerns about tenant responsibilities in maintaining property conditions. There were discussions about whether tenants should also be held accountable for property upkeep, with landlords arguing that poor living conditions are sometimes the result of tenant misuse rather than landlord neglect.

Challenges and potential burden on landlords

Many landlords expressed concerns that an APCR would create additional administrative burdens and costs. Some believed it would discourage landlords from staying in the rental market, leading to reduced housing availability. Others supported the idea of property condition records but suggested integrating them into existing systems to reduce duplication.

Recommendations for implementation

Respondents cited the following recommendations for implementing an APCR:

- inclusion of any property maintenance undertaken
- inclusion of record of any enforcement actions against the landlord
- focus on property condition only – safety checks, structural integrity, and maintenance needs should be the primary focus
- keep rent data collection separate – if collected, it should be done at the time of rent changes rather than annually
- Inclusion of rent data in APCR to reduce landlords administrative burden
- reduce administrative burden – align with existing reporting mechanisms to streamline processes
- ensure clarity on responsibility – clear guidance is needed on issues like mould and condensation to avoid liability disputes
- consider integration with health data – some respondents suggested linking property condition to health outcomes such as respiratory diseases

The responses indicated mixed opinions on the need for an APCR. While there was support for documenting property condition and compliance, concerns remained about the inclusion of rent data and the burden placed on landlords. If implemented, it was suggested that efforts should be made to integrate with existing systems, reduce redundancy, and ensure clarity in reporting standards.

Question 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.

Question 15 asked respondents to indicate any other groups of people who have not been identified in the proposed eligibility criteria who should be considered.

Key themes

The majority of respondents (100) did not give an indication of further groups that should be included in the eligibility criteria and two respondents expressed that they were unsure regarding further groups which should be included.

Additionally three respondents indicated that they were confused or did not understand the question or the proposal.

Respondents who did indicate further groups who could be included (46) indicated the following groups in order of most frequently mentioned to least frequently mentioned:

- those at increased risk of homelessness due their circumstances, with clear criteria outlined, such as low income or having recently received an eviction notice
- young people – including specific subsets such as students, care leavers, first time renters or those at risk of homelessness transitioning away from supported accommodation or youth support services
- those with mental or physical health issues – who may have additional requirements around the accessibility of the property and appropriate support
- low-income households
- disabled people – including those who may need further adjustments such as a live-in carer
- older people – due to challenges securing appropriate properties to meet their needs in terms of size and accessibility requirements
- refugees and asylum seekers
- survivors of domestic abuse
- landlords
- unpaid carers
- vulnerable individuals who lack a reference.

Additionally, the provision of a rent guarantor in the national guidance was welcomed by 4 respondents.

Question 16: Do you think permitted payments would support people with pets to access the private rented sector?

This question explored whether permitting additional payments from tenants would help them secure housing in the private rented sector when they have pets. The majority of respondents supported the idea (183), but there were varied opinions on how this should be structured.

Table 3.23: Sentiment analysis of answers to question 16

Response	No. of respondents
Yes	183
No	40
Don't know	30
No View	0
Inconclusive	2
No Answer	24
Total	279

Source: Miller Research analysis of consultation responses

Table 3.24: Stakeholder sentiment analysis of answers to question 16

Stakeholder Group	Yes	No	Don't know	No View	Inconclusive	No answer (-)	Total
Academic			1				1
ACORN Campaign	128						128
Charity and third sector	10	1	1			8	20
Housing sector	1					1	2
Individual	29	32	26			9	96
Local authority	8	2	1		1		12

Private sector	3	3	1			3	10
Public sector	2				1	2	5
Representative body	2	2				1	5
Total	183	40	30	0	2	24	279

Source: Miller Research analysis of consultation responses

Key Themes

Uncertainty or lack of knowledge: many respondents stated they "don't know" or were unsure about the implications of the policy. Some respondents indicated a lack of clarity on the question or did not provide a meaningful response. Key themes that emerged are discussed below.

Support for tenants with pets

Those who agreed expressed support for policies that allow tenants to have pets in the private rented sector, citing the mental health benefits and companionship that pets provide. Some believed current pet restrictions were discriminatory, and policies that encourage landlords to accept tenants with pets, while mitigating potential risks, were endorsed.

Insurance

Many respondents raised concerns about the financial implications of pet ownership, especially the potential for property damage. There were debates over who should cover pet-related damages—landlords or tenants—and whether pet-specific insurance policies could address this issue. Some feared that permitted payments could be viewed as an advance payment for damages, potentially leading to misunderstandings or further financial strain.

Concerns about property damage

Landlords expressed concerns about the damage pets might cause to their properties, including scratches, stains, lingering smells, and allergens. Some landlords noted that pet-related damage was often a significant cost, while others believed that the risks of damage had been overstated compared to regular wear and tear.

Landlord autonomy and property suitability

Many respondents felt that landlords should retain the right to decide whether pets are allowed in their properties, especially when considering the suitability of the property. For example, shared accommodations or flats without outdoor access may not be suitable for pets. Concerns about nuisance issues, such as barking, were also raised.

Regulatory considerations

There was debate about whether the government should regulate pet policies in rental agreements. Some respondents argued that landlords should have the autonomy to set their own rules, while others supported clearer guidelines and protections for tenants with pets.

Tenant responsibility

Some respondents argued that tenants should bear full responsibility for any pet-related damages, suggesting higher deposits, mandatory insurance, or additional fees. Landlords expressed frustration over the difficulty of reclaiming pet-related damage costs.

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

Question 17 asked respondents to consider they anticipate any positive or negative impacts that would result from this proposal.

A total of 95 respondents indicated further impacts they expected to arise as a result of the proposal. However, 56 respondents did not indicate any further impacts, positive or negative they expected as a result of the proposal.

Q17i Why

Key themes

Respondents who did anticipate further impacts as a result of the proposal suggested the following positive and negative impacts outlined under each section in order of most frequently mentioned positive and negative impacts to least frequently mentioned.

Positive impacts anticipated by respondents included the potential for improved security for the landlord and contract holder and a positive impact on homelessness levels as a consequence of those with pets having greater access to properties in the private rented sector.

Negative impacts anticipated by respondents included a reduction in the supply of housing in the private rented sector as a result of landlords leaving the sector, increased costs and rents associated with greater costs incurred by landlords as a result of increased damage (beyond the amount set by the pet deposit scheme) and increased cost of insurance. Additionally, some respondents felt that there was a risk of landlords overcharging pet owners through increased rent and so tenants with pets would in effect be paying twice – i.e.: through the pet deposit scheme and through increased rent. Finally there were concerns that the proposal would lead to a potential two-tier system where those with higher incomes who are able to afford the deposit would have access to the private rented sector with pets, but that those on lower incomes would struggle to afford such a deposit.

Question 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 private rented sector homes?

Question 18 proposed criteria for a refund of the higher residential rates Land Transaction Tax (LTT), which the consultation positioned as a response to feedback obtained through the Green Paper. The proposed LTT higher rates refund aims to incentivise the supply of affordable housing. When introducing the proposal, the consultation proposed that the LTT higher rates refund would apply to property owners leasing to local authorities through Leasing Scheme Wales, which provides security of tenure for landlords and tenants, with a minimum lease spanning a five-year period.

Table 3.25: Sentiment analysis of answers to question 18

Response	No. of respondents
Yes	42
No	33
Don't know	165
No View	0
Inconclusive	4
No Answer	35
Total	279

Source: Miller Research analysis of consultation responses

Table 3.26: Breakdown of responses by stakeholder group to question 18

Stakeholder Group	Yes	No	Don't know	No View	Inconclusive	No answer (-)	Total
Academic			1				1
ACORN Campaign			128				128
Charity and third sector	2	1	5			12	20

Housing sector			1			1	2
Individual	28	29	27		1	11	96
Local authority	8				1	3	12
Private sector	3	1	2		1	3	10
Public sector	1				1	3	5
Representative body		2	1			2	5
Total	42	33	165	0	4	35	279

Source: Miller Research analysis of consultation responses

Responses to this question were fairly evenly split between ‘yes’, ‘no’ and ‘don’t know’, although the breakdown of responses suggests that more information may be needed to provide clarity of views.

Q18i Why?

Key themes

Whilst some agreed that the LTT refund could act as an incentive, others felt that it would have limited impact.

Incentivising landlords

Those who responded “yes” suggested that it was a positive step to incentivising landlords, reflected by the view that ‘any removal of barriers is positive’. However, concerns persisted about excessive regulations, fairness, long-term effectiveness, and the need for broader market reforms to sustain overall investment in the private rented sector.

Those who responded “don’t know” offered different reasons although some believed an LTT refund could incentivise investment in affordable rental housing, in principle. However, many remained uncertain due to:

- perceptions of ‘low’ LHA rates (not appealing enough)
- better financial returns to be made outside of leasing schemes
- regulatory/administrative burdens
- the need for more evidence on cost-effectiveness compared to other housing policies

Some provisional support was received from third sector organisations, but respondents generally suggested that more information and evidence would be needed to cast judgement on the proposal. These respondents indicated a lack of informed response and a

need for further clarity; however, they supported reasonable measures to re-balance supply in the private rented sector.

Ineffective measure

Several respondents expressed that the LTT would be a dissuading factor in relation to the purchase of properties in Wales, and therefore the expansion of the private rented sector. Generally, respondents who had a negative view of the proposal were more concerned with the role of the LTT as a barrier for landlords entering the private rented sector, in the first instance.

Those who responded “no” from a private rented sector perspective rejected the LTT refund as an effective incentive for signing up to LSW, arguing that higher market rents, ongoing costs, low LHA rates, and broader regulatory pressures make it unattractive. Instead, these respondents called for tax reductions, increased LHA rates, and policies that encourage landlords to remain in the private rented sector overall rather than just leasing to local authorities.

Others posed wider issues in relation to uptake of the LSW (Leasing Scheme Wales). This included suggesting that despite the saving of the refund, a landlord could still be better off not signing up to the leasing scheme and instead renting at market rates; and some negative sentiment raised in relation to leasing to local authorities.

In relation to the specific proposal, only two respondents commented on the reduced revenue obtained through the LTT as a result of refunds.

Clarifications

Respondents raised the following issues, suggesting a need for further clarification surrounding the proposal:

- uncertainty over whether the refund is only eligible when leasing to local authorities
- a lack of understanding on the extent to which Ministerial discussion has taken place on this, when considering impact on national revenue
- the need for reassurance/safeguards from local authorities to ensure that properties would be returned in the same condition to owners as when they were handed over

Question 19: 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?

Question 19 asked respondents to consider the period of time that is reasonable between purchase of the dwelling and entering the headlease with the local authority, to be eligible for a refund.

The majority of respondents (52) did not give an indication regarding the period of time period that should be included or expressed that they did not know what time period should be included (79).

Key themes

For those who did suggest a time period there was a wide variation in suggested timeframes ranging from "immediate eligibility" to "ten years." The time periods suggested by respondents are outlined as follows:

- Eligible immediately, or almost immediately (within a week) (7 respondents)
- 1 - 3 month (3 respondents)
- 3 - 12 months (12 respondents)
- 12 - 36 months (5 respondents)
- 5 - 10 years (3 respondents)

Five respondents indicated that the refund should be available from point at which landlord indicated in writing to the local authority that they wanted to pursue the option until the lease is signed.

Many responses suggest a flexible, case-by-case approach, depending on the property condition and required renovations. Twelve respondents were unsure of the time period stating that it depended on the level of work that was required; however, these generally fell between 3-6 months.

Eight respondents to the proposal disagreed with the premise of the question, suggesting that there should not be a refund or that the proposal should only apply to the private rented sector and to not to social housing. Finally, one respondent suggested that the refund would not provide an incentive to landlords to lease to local authorities as they would expect lower returns.

Question 20: Do you anticipate any positive or negative impacts which would result from this proposal?

Question 20 asked respondents to suggest any positive or negative impacts they anticipated as a result of the proposal.

Overall, 131 respondents who did cite further impacts, 6 respondents cited potential positive impacts, and 42 respondents cited potential negative impacts. Additionally, the ACORN campaign response expressed mixed views including both positive and negative impacts expected as a result of the proposals.

Furthermore, 80 respondents cited either no further impacts and 4 respondents expressed uncertainty regarding potential positive or negative impacts.

Key themes

Anticipated positive impacts highlighted by respondents in relation to question twenty included the following:

- Potential for the proposed changes to LTT to result in more affordable housing available to the local authority.
- Potential for the LTT changes to encourage landlords to join the leasing scheme and incentivise landlords to work with local authorities.
- Potential to reduce the number of individuals living in temporary accommodation and support them into secure housing. This included also the potential reduction in local authority spend on temporary housing.

Furthermore, the following anticipated negative impacts shared by respondents included:

- Concern expressed from the ACORN campaign response and two further non campaign responses around the potential negative impacts of spending on 'tax breaks' for landlords and those 'with sufficient wealth to purchase a second property', which was viewed as money that should instead be used to fund social housing to support the homeless.
- Two respondents flagged potential unintended negative responses that could arise in the wider housing market if buy-to-let properties are promoted as 'a lucrative investment' or 'heavily incentivised', which could affect affordability of housing for first times buyers. One Public Sector respondent felt that the proposals could lead to an increase in 'speculative' property purchases in Wales from those living outside Wales to rent out and claim tax benefits, which could lead to further 'disillusionment' in local communities. Additionally, another respondent indicated that those who would benefit the most from the proposed LTT refund scheme would include large property investors.

- Additionally, two respondents indicated that there would be a negative impact in the form of reduced LTT revenue as a result of the refund proposals if the scheme was to be widely taken up.
- Conversely, one respondent also indicated that there is a risk that the scheme may have a more a limited effect on the overall number of purchases being diverted for let via LSW which would be a negative impact. It was felt however that this would be caveated by the potential positive that low take up would not therefore result in a significant reduction in LTT revenue. The respondent pointed to polling that suggested that when asked whether a rebate on the higher rate of LTT would incentivise landlords to invest in property to let in the private rented sector (and register with RSW), only 30% of respondents indicated that they would consider purchasing more properties in Wales as a result. The respondent therefore suggested the need for additional measures to de-risk the Leasing Scheme Wales.
- One respondent suggested that the limitation to the LTT refund proposal could include the limited long term impact of the scheme if, once the proposed five year time period of renting to those in need of affordable housing is over, landlords no longer have an incentive to continue doing so and may increase the rent above the LHA rate or convert the property into a holiday let.
- One respondent suggested that the proposal was 'not viable' as the LTT would not provide sufficient incentive for landlords in the private rented sector to lease properties to local authorities given the overall low rents expected.
- One respondent suggested that the LTT would pose a barrier to landlords entering the private rented sector (in particular 'accidental landlords') as it is suggested that the upfront payment may discourage landlords from purchasing a second home or retaining properties to rent rather than selling.

Additional 'neutral' considerations or points of clarification raised by respondents included the following:

- Clarification sought on whether the refund applies only if the property is rented via the local authority.
- Suggestion that there should be 'consequences' for landlords who attempt to withdraw from the scheme.
- The suggestion that greater ministerial discussion should be held prior to introducing the LTT refund proposal due to wider potential implications on national revenue and spending priorities.

Question 21: Do you have any further evidence or observations you wish to provide?

Question 21 asked respondents if they had any further evidence or observations they wished to provide on the proposal.

In total 134 respondents provided further observations or evidence) and 78 respondents did not have any further evidence or observations to provide.

Evidence

In response to Question 21, the evidence referenced by respondents included the following:

- potential learning from other European countries including the 16 who have implemented rent controls or other interventionist policies, such as, providing compensation to require landlords to rent to vulnerable tenants, and regulating short-term lets in tourist areas to support local residents
- a joint survey in 2021 by Dogs Trust and Cats Protection of tenants across the UK indicating that 27% of tenants surveyed reported that their landlord allowed a cat or a dog – the lowest in the UK, alongside the benefits of pet ownership reported by tenants, the report noted the willingness of tenants to take responsibility for their pet including; committing to an end of tenancy professional clean (86% cats and dogs), willingness to pay for damage (83% for cats and 86% for dogs), and pay capped deposits (55% for cats 58% dogs)
- Crisis stated that the expert review panel found significant variation in allocations policies across Wales which exclude people who have historic rent arrears, previous instances of unacceptable or anti-social behaviour. The review found that former offences create disproportionate barriers to accessing adequate housing for people with experience of homelessness

Positive observations

Some responses indicated positive further observations including respondents welcoming the proposals, noting expected positive impacts on tenant access and affordability of rentals.

However, some respondents felt the proposals could have gone further in terms of proposing limits on annual rental increases and taking wider measures on housing supply to improve affordability.

Negative observations

Respondents who recorded negative observations included further opposition to the proposals including highlighting expected negative outcomes for landlords and the private rented sector as a whole including a reduced and less diverse supply of housing and increased rents, as a result of additional regulation in the context of wider reforms that have been introduced in the sector.

A minority of 11 individual respondents and 2 local authority respondents felt that the proposed reforms should be more balanced and proportionate in terms of the requirements expected from landlords and agents and that more support could be provided to help landlords adapt.

Respondents also suggested that the proposals would place significant pressure on regulatory services including RSW with consideration of budgets, resources and expertise needed.

Furthermore, the ACORN Campaign responses to the consultation expressed the view that the measures outline in the proposal did not go far enough to have an impact on affordability of rents in the private rented sector. Instead, further measures of introducing rent controls were proposed as a potential measure that could be introduced to provide tenant protection in the interim while rental data is being collected. It was suggested that the evidence base for the impact of rent controls already exists with 16 other European countries having already introduced these measures which, it is implied, has led to improvements in the rental market.

Question 22: We would like to know your views on the effects that the White Paper would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favourably than English. What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

This question received few responses compared to the consultation as a whole.

Thirteen responses stated that the Welsh language had no relevance to the White Paper on fair rents and adequate housing, with a small number viewing language promotion as an unnecessary expense and distraction from housing issues.

Six responses suggested that the policy may have a positive effect on the Welsh language due to the increase in affordable homes, particularly in rural communities, stabilising communities where Welsh is used day-to-day, accessibility of services for example estate agents and provision of housing in areas with services such as Welsh speaking schools.

Three responses offered additional comment including that English-speaking people should be restricted from moving into Welsh speaking areas, that non-Welsh people may rethink their investments in Wales, that the Welsh language should be more in schools.

Two responses suggested potential negative impacts with one suggesting that local people who speak Welsh will have to leave Wales to become landlords elsewhere, and the other, that the costs of translation will need to be passed on.

Question 23: Please also explain how you believe the proposed policy could be formulated or changed so as to have positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language, and no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

This question received few responses, including 2 responses in Welsh. Those that did respond reflected a range of perspectives on how the proposed policy could impact the Welsh language. Some responses supported the idea of encouraging the use of Welsh in rental agreements and services where there is demand, ensuring equal access to information in both languages. A small number of responses stressed that language policy should not be forced upon landlords, tenants, or investors, fearing it could discourage investment.

Responses suggested a range of policies including providing Welsh lessons for refugees, increasing Welsh-medium education, or conducting an independent study on the costs and benefits of bilingualism in housing policy. However, some respondents commented that the Welsh language is not relevant to the rental market and question the necessity of including it in the White Paper.

Question 24: We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them

Few respondents responded to this question; themes identified by those who did are considered below from most frequently mentioned to least frequently mentioned.

Seven respondents opposed government regulation of the sector and the White Paper generally with a preference for “market forces”.

Five respondents proposed an increase in the provision of social housing through a range of policies including, joint-ownership between landlords and local authorities, purchase of private rented sector properties by local authorities, and the building of new social housing.

Four respondents suggested that landlords need greater support from government, that it should be respected as a business and that rules and regulations should be kept to a minimum.

Three respondents warned of unintended consequences such as a reduction in supply of homes and suggested more research could help understand the barriers to home ownership.

Individual respondents suggested that:

- energy efficiency is a priority for adequate housing and that policy must align with the Welsh government’s Tackling Fuel Poverty Plan
- particular focus should be paid to survivors of domestic abuse and sexual violence, which was completely absent from the White Paper, as they are further disenfranchised from receiving support
- that the delay in court proceedings is a particular concern for landlords
- that good tenants should be better protected from bad tenants
- that large corporate landlords should be differentiated from small landlords.

4. Non-Standard Responses

Adequate Housing

Legal security of tenure

Respondents suggested that there were different approaches to ensuring legal security of tenure, and the use of different tenures can be beneficial, including community led housing which can provide bespoke tenures which Cwmpas stated can ensure “homes are let to those most in need”. They suggested that there was a need for stronger enforcement of rental protections and clearer routes to challenging unfair evictions, including by introducing a national standard for longer term tenancy agreements. Finally, one respondent highlighted that Wales will soon become the only nation in Great Britain which allows no-fault evictions, stating that this undermines the security and stability that people need from their home. They made the case that no-fault evictions disempower tenants to raise formal and informal challenges with their landlords due to the reality of retaliatory evictions.

Affordability

Affordability was raised by a number of respondents, with third sector respondents highlighting the centrality of affordability to certain forms of housing and the need to take wider considerations into account such as the development of the local economy and circular economy models through the use of local businesses. One respondent pointed to a forthcoming paper which suggests that young people face particular challenges, with 50% of young people they spoke to spending more than 30% of their income on housing (which is often used as an affordability definition), 39% having to cut back on heating, food and care costs, and 69% cutting back on non-essential costs which will impact the local economy. However, one landlord suggested that they need to encourage a competitive private rented sector with more properties available to reduce the cost of rents and pointed to the increase in interest rates as the source of recent rent increases.

Availability of services

Regarding availability of services, respondents agreed that housing developments should include access to essential services such as healthcare, education, and culturally relevant businesses. They also suggested that improved public transport links should be prioritised in housing developments to ensure accessibility, particularly for lower-income families from ethnic minorities.

Habitability

A number of respondents singled out habitability for comment, with landlords suggesting that the private rented sector stock tends to be older, in poorer condition, and difficult and costly to maintain due to the construction type and age. Third sector organisations highlighted that people from ethnic minorities and young people are disproportionately affected by poor housing conditions with effects on their health. The Children’s Commissioner suggested that this factor should be separated into different indicators to

ensure greater accountability on specific issues when they interact with the rights of the child.

These rights included:

- Article 12: the right for a child who is capable of forming his or her own views the right to express those views freely in all matters affecting the child.
- Article 16: No child shall be subjected to arbitrary or unlawful interference with his or her privacy, family, home or correspondence, nor to unlawful attacks on his or her honour and reputation.
- Article 27: the right of every child to a standard of living adequate for the child's physical, mental, spiritual, moral and social development.
- Article 31: the right of the child to rest and leisure, to engage in play and recreational activities appropriate to the age of the child and to participate freely in cultural life and the art.

Accessibility

Two respondents addressed this issue, both third sector organisations, and both emphasised the need for more diversity in the housing market, particularly the need for more housing designed for multi-generational families, the need for support accessibility modifications, and the ability of groups to develop homes to meet their own additional needs, as is availability to those in community led housing.

Location

Respondents stressed that location is vitally important to ensure an enriched and fulfilled life with the need for access to a home that allows them to be close to work, family, friends, key services, and enables them to embrace their culture and language. They emphasised this in relation to the Welsh language and strong local connections.

Cultural adequacy

Respondents here pointed to the need for housing developments to consider cultural needs, including close proximity to places of worship, cultural appropriate grocery stores and community centres. This included social housing policies accommodating religious and cultural needs such as prayer spaces, separate kitchens, and culturally sensitive design. One pointed to the need for local authorities to ensure that authorised sites for Gypsy and Traveller Communities are located in areas that respect their way of life.

Fair Rents

Non-standard respondents were concerned about potential limitations of the rent challenge policy, particularly the issue of retaliatory eviction. One third sector respondent expressed concern about continuing current limitations with the existing mechanism to challenge rent, in particular, the use of “fairness” of rent with regard to market values alone. They presented a case study of an individual who unsuccessfully challenged a rent increase of 67% and had

to leave her accommodation due to the inability of LHA to cover the increase. Another third sector organisation suggested the following recommendations to improve any rent challenge mechanism:

- processes should be low cost (for all)
- accessibility for all
- monitoring on decisions made based on equality, diversity and inclusion (EDI) data to identify any unconscious bias in decision making
- explore options to prevent retaliatory evictions in cases where increases are not held
- co-production in developing processes with all relevant stakeholders, including tenants' groups and landlords

Non-standard responses were generally supportive of the introduction of an APCR with third sector organisations stating that it would support those have “suffered from poor housing inequality”. In addition, one organisation suggested that the database should include data on protected characteristics to monitor any patterns faced by communities and support the development of interventions. They also suggested that co-production between tenants and landlords is undertaken to review an APCR and decide on indicators beyond those in Fitness for Human Habitation. One third sector organisation expressed concern that the burden of enforcement in a system reliant on self-certification would fall on tenants and in that case the approach would be ineffective at improving conditions without independent assessment. Another organisation questioned the reliance on self-certification due to tenants experience of getting landlords or letting agents to address issues “even when they were legally responsible”. They suggested a need for a clearer route to seek redress for tenants with both the landlord and tenant required to certify the property. One landlord suggested that tenants will “use it to report trivial faults and will justify none payment of rent”.

Third sector organisations suggested that the LLT refund may make a minimal impact on the supply of affordable housing. One suggested that there may be unintended consequences by encouraging private investors to purchase housing impacting on house prices for home buyers, they suggested the focus should be on the expansion of the social housing sector. Another suggested that should the policy be adopted it should include community led housing. Finally, another argued that the main barrier to entering LSW was the gap between LHA and market rent rates and instead suggested that efforts should be made to increase the LHA rate at the UK level. A private rented sector landlord re-iterated this point stating that LHA rates are not economically viable.

Three respondents addressed the guarantor scheme with two third sector respondents stressing the impact this could have on refugees, asylum seekers and international students if implemented correctly. A private rented sector respondent stressed the need for guarantors due to the risks associated with letting properties as a “high calibre tenants, earning good wages, in steady relationships etc but then life turned bad and they came off the rails” leading to non-payment of rent.

Regarding the proposed pet policy two third sector organisations highlighted the impact that having a pet can have on a person's wellbeing and health, however, they suggested the need for limits on the additional amount chargeable to ensure they do not become unaffordable, similarly, one expressed concern about "pet insurance" falling to tenants. A third sector respondent also suggested that this change should be extended to all tenure types such as those living in social rent homes, in particular to the effect this may have on homelessness. Two private rented sector respondents expressed concern about the damage that pets can have on a property, although one suggested that they had no issue with long-term tenants having pets, rather the issue was short-term tenants.

Other

In addition to the above focus on adequate housing and fair rents non-standard responses addressed the policy making process, the private rented sector landscape and the need for collaboration in the sector.

Regarding the policy making process five non-standard responses had concerns about the consultation with two suggesting that the process has not been "genuine collaboration" where the questions "presuppose support" for the principles. They also suggested that the questions and White Paper were too technical, acting as a barrier to meaningful engagement. Another respondent suggested that the Welsh Government should commit to co-production of the next steps with both landlords and tenants. The Children's Commissioner for Wales stated that more focus was needed on points raised in the CRIA to ensure there is a clear outline in legislation on what engagement with children and young people will look like as the Welsh Government should be specifically required to support young people and children to influence the strategy. Finally, a third sector organisation suggested that the policy lacked ambition in that it was limited to tenancy in the private rented sector, that the proposals fail to address improving affordability, and that the White Paper fails to address lack of security of tenure due to the presence of no-fault evictions.

Nine respondents addressed the private rented sector landscape in their responses. Two landlords expressed concern about the policy impact on the private rented sector with suggestions of a reduction in landlords, rent increases and reduction in accommodation due to too much focus on affordability. One of these respondents expressed dissatisfaction with a number of components of the legal landscape including the "judicial system" for placing barriers for "well-meaning private landlords". Third sector respondents suggested that the private rented sector landscape was not operating effectively placing barriers of affordability, security and living conditions on private rented sector tenants. A number of respondents suggested that better data was required with one suggesting that a local housing needs survey and better local data collection could help resolve these barriers. However, another suggested that the lack of data was not an excuse for not taking action, i.e. the introduction of rent controls. Another questioned whether the expansion of the private rented sector was desirable suggesting that young people would rather see an expansion of social rented or owner occupier sectors and suggested that the White Paper lacked a long-term direction. This was re-iterated by another who suggested that treating houses as homes rather than assets would also help safeguard the Welsh Language. These calls for greater ambition to

tackle the private rented sector landscape as a whole was echoed by another respondent who pointed to the success of the Housing (Wales) Act as a model due to its ambitious approach. Finally, a third sector respondent suggested that concerns around “landlord exodus” were misguided, presenting evidence such as the UK Rental Market Report June 2023 by Zoopla, as well as Rent Smart Wales data.

The final themes presented included a response by a landlord that focussed on the need for collaboration between stakeholders across the sector, two third sector organisations that emphasised the role that community led housing can have in addressing the challenges faced by the sector, and the need for greater regulation to support vulnerable people, including:

- a rental subsidy for individuals living below a specific income threshold but above benefit eligibility
- the introduction of rent caps linked to median local incomes
- limit the ability of landlords to increase rents between tenancies by implementing a 12 month period tied to the property rather than the tenancy

Respondents also highlighted the need for further support for landlords to make improvements, for example, meeting EPC ratings as the private rented sector housing stock tends to be the most difficult to retrofit due to age and condition. They also pointed to the need for investment in the housing sector across all tenures, and a landlord suggested that they had contributed to that investment by taking properties in poor condition and renovating them.

5. Easy Read Responses

Seven respondents chose to respond to the consultation using the easy-read format.

Question One: What do you think about our ideas in the section called Housing Adequacy?

Three respondents agreed with the ideas in this section, while the other four respondents' sentiment was mixed or unclear. Those that were mixed suggested that landlords need security of income, that legislation proposed is already in place, and that landlords face a number of challenges already. Another suggested that issues such as energy efficiency must be carefully handled because of the age of the housing stock in Wales and the work that would be required to raise the stock to EPC C. Two respondents raised the issue of second homes with suggestions that buyers of second homes should face increased tax, and a limit on the number of second homes in an area should be put in place.

Question Two: What do you think about our ideas in the section called Private Renting?

Three respondents supported the proposals over all with one discussing their experience of retaliatory evictions after reporting poor conditions and having rented to refugees with the council acting as a guarantor.

Two respondents were concerned about data privacy, however, one of the respondents suggested that this could be done through anonymisation. This respondent opposed the APCR and instead proposals random checks on landlords. This was reflected by another respondent who suggested there was too much administration.

Two respondents discussed the issue of pets with one supporting tenants having pets but thought it should be through agreement with the landlord rather than a right. The other stressed the damage that pets can cause, particularly dogs. The final direct responses to the proposals came from a respondent who stated that they did not understand the Land Transaction Tax proposal. Finally, a respondent stated that the private rented sector works well and that migration is the cause of the housing shortage.

Question Three: Is there anything we missed?

One respondent said that government should not interfere with private businesses, and that the worst landlords are housing associations. Another suggested that the private rented sector needed support to ensure the sector survives. A third said they would be interested in a central point that would allow investors to collaborate with government and councils to help improve housing options. Finally, 2 respondents suggested that additional regulations were not needed when the system was working well and the focus should be on areas that need improvement such as too many holiday homes in certain areas.

Question Four: Is there anything else you would like to say?

One respondent suggested that there is too much regulation on private landlords and that landlords are victims of bullying by councils and governments, and suggested they would evict their 21 tenants if more regulation was put in place. Another suggested that there are barriers to landlords increasing the supply of rental properties by buying empty homes.

The Welsh Government Next Steps

The Welsh Government is grateful to all who responded to the White Paper consultation. The responses to this consultation and the analysis will inform further policy development. We will also continue to work closely with our stakeholders, including those who were involved in the Stakeholder Advisory Group for the White Paper.

We have considered the evidence submitted in respect of the proposals aimed at delivering adequate housing for everybody in Wales. Reflecting the view held widely among respondents that a long term housing strategy could help drive progress towards ensuring access to adequate housing for people across Wales, we are progressing work to develop our future Housing and Regeneration Strategy.

We have considered the evidence submitted in respect of the proposals aimed at improving the affordability, habitability and accessibility of the Private Rented Sector.

Following the generally positive response to the proposals regarding the collection of rent data and for an 'Annual Property Condition Record', we will commence engagement with Rent Smart Wales and the representative bodies for landlords, agents and tenants on developing proposals further and reflecting on the evidence received.

In response to the evidence received on the proposal to remove a barrier from pet owners to access the Private Rented Sector, we will look to make provision through regulations to make pet insurance a 'permitted payment' under the Renting Homes (Fees etc.) (Wales) Act 2019.

Furthermore, following the evidence submitted on the proposal for national guidance for rent guarantors, we are establishing a Stakeholder Group with local authorities to take forward and develop the guidance.

We are analysing the responses submitted in respect of the proposal to provide a refund of the higher residential rates of Land Transaction Tax (HRRLTT), where a private landlord buys a dwelling and then leases it to a local authority through Leasing Scheme Wales (LSW). Further consideration is being given to whether the proposed HRRLTT refund will incentivise increased sign-up to LSW and support provision of housing to local authorities, for use as affordable rental accommodation to help tackle homelessness.

Annex A: Summary of White Paper Consultation Events

As part of the evidence gathering to support the White Paper consultation, a series of free workshops were held in January 2025. A workshop for landlords and agents was held in both Cardiff and Llandudno. A workshop for Private Rented Sector tenants was held in Cardiff, with support from TPAS Cymru.

The aim of these workshops was to gain views on the short to medium term interventions proposed in the 'Fair Rents' section of the White Paper. This section of the White Paper looks at improving the affordability, habitability and accessibility of the Private Rented Sector, which is a key component of our commitment to delivering housing adequacy. The content of these workshops included a presentation on the White Paper, interactive group work to discuss the White Paper, and a Q&A session.

An online live event was also held via Microsoft Teams for those unable to attend the in-person events. This session included a presentation on the White Paper and a moderated Q&A session. There were 41 registrations for the live event and 75 who attended.

The Welsh Government also gave a presentation and participated in a Q&A discussion at an online 'webinar' event ran by the Bevan Foundation on 'The White Paper on Adequate Housing and Fair Rents: where next for Welsh housing?' There were 91 registrations for this event, with 61 who attended.

Landlord and Agent Workshops- Cardiff and Llandudno

The landlord and agent workshops were advertised and promoted by Rent Smart Wales, the licensing and registration authority for rental properties in Wales Rent Smart Wales, NRLA, and Propertymark.

There were 45 registrations for the landlord/agent workshop in Cardiff, with 30 who attended. There were 40 registrations for the landlord/agent workshop in Llandudno, with 31 who attended.

The interactive group work was facilitated using Slido, an online Q&A and polling platform. Participants were able to share their views using Slido. The Slido data is on **Annex A.1**.

Facilitators from the Welsh Government were available on each table, who captured additional views and statements from participants from discussions which were not captured on Slido. These notes can be accessed below. These views and statements are therefore those of participants and not the Welsh Government.

Views expressed by attendees:

Rent Data

- Bureaucratic for landlords.
- Concern this data would be used to implement rent control.
- Landlords who used agents felt it would be used by agents as a justification to charge additional fees for managing properties.

- Could give a reason for agents to increase property management fees.

Annual Property Condition Record

- Bureaucratic for landlords.
- More detail needed on what information would be required.
- It could be disruptive to tenants if landlords wanted to carry out detailed inspections of the property annually.
- Could be a reason for agents to charge increased management costs.
- Could provide assurances that agents are carrying out annual property inspections
- Do not understand why it would be required as these actions are already required under the Renting Homes (Wales) Act.
- Issues of tenant compliance and how to prove when a tenant is contributing to issues in a property e.g. mould.
- It could be useful to have a template for self-certification that none of the hazards listed in the Fitness for Human Habitation Regulations are present in a property.

Barriers to renting: Renting with Pets

- Barriers to allowing pets included damage to property and nuisance to other tenants/neighbours.
- The proposal would not help as would be unable to successfully claim for pet damage on insurance.
- The tenant should take out insurance to cover pet damage.
- It would be better to charge higher rents instead of relying on an insurance policy as concern the insurance policy won't pay out.

Barriers to renting: Rent Guarantor Scheme

- Could be sufficient if there was legal enforcement of the guarantor if required.
- Landlords do not always undertake credit checks.

Land Transaction Tax Higher Rates Refund

- Could provide more properties for the social sector.
- Encouragement for landlords to invest in additional properties.

General comments

- More regular, in person meetings would be helpful.
- A list of traders on RSW would be useful to landlords / agents.
- It would be useful to have information on the UK Government / Welsh Government grants available to landlords to improve the energy efficiency of their properties.

Private Rented Sector Tenant Workshop- Cardiff

The Private Rented Sector workshop was advertised and promoted by several stakeholders, including TPAS Cymru, NUS Wales, Rent Smart Wales, The Wallich, Cymorth Cymru, and Generation Rent.

There were 18 registrations for the Private Rented Sector Tenant workshop in Cardiff, with 13 who attended. Attendees were offered Tempo Times Credits as remuneration for participating.

The interactive group work was facilitated using Slido, an online Q&A and polling platform. Participants were able to share their views using Slido. The Slido data is on **Annex A.2**.

Facilitators from the Welsh Government were available on each table, who captured additional views and statements from participants from discussions which were not captured on Slido. These notes can be accessed below. These views and statements are therefore those of participants and not the Welsh Government.

Views expressed by attendees:

Rent Data

- The data would be useful/would use the data.
- Availability / supply of rental properties a concern- often pay above the market rent just to secure a property.
- Spatial mapping should not just show average rents but also top and bottom of the rent range.
- Could be more useful for designing policy rather than for tenants due to the lack of properties available- you have to take whatever you can.
- If you took your landlord to a tribunal, they would just evict you.

Annual Property Condition Record

- More information needed on how this would be useful for tenants e.g. where could it be accessible, what rights would it give, how could it be used.
- Wouldn't check if a property had an APCR as it seen as additional burden on the tenant

Barriers to renting

- Lack of supply.
- Discrimination- due to race, disability, or being a single parent.
- Excessive deposit fees, sometimes 6 months up front plus deposit.
- No DSS.
- Agents work for the landlord- where is the protection for the tenant?
- Affordability.
- Low standard of energy efficiency in accommodation.
- Lack of credit history.
- Overcrowding.
- Many letting agents / landlords will not let you register to view a property without a guarantor- payslips not enough.

General comments

- Lack of tenant voice. Landlords have a representative body- where is this for tenants?

Annex A.1- Landlord and Agent Slido Responses

Participants were asked the following questions at both workshops:

1. Do you agree or disagree with the proposal that licensed landlords and agents should be required to provide data on rent and rent notices to Rent Smart Wales?
2. Have you provided rent information to Rent Officers?
3. What are the positives of this proposal?
4. What are the negatives of this proposal?
5. Do you think that licensees should need to update their Rent Smart Wales account annually to complete an Annual Property Condition Record?
6. How can we ensure a proportional approach for licensed landlords and agents managing a large portfolio?
7. What are the positives of this proposal?
8. What are the negatives of this proposal?
9. Currently, would you rent to a prospective tenant with pets?
10. What would you consider the largest barriers to allowing a prospective tenant to rent with a pet?
11. Has a tenant ever asked you if they could have a pet?
12. Would this proposal provide you reassurance to allow pets in your rental properties?
13. Are there any other measures we should consider?
14. What are the positives of this proposal?
15. What are the negatives of this proposal?
16. Have you ever asked a prospective tenant for a Rent Guarantor?
17. Would a letter of assurance from the local authority be sufficient?
18. Have you asked for rent up front?
19. Would a stronger Rent Guarantor scheme give you confidence to you not request additional rent up front to secure a tenancy?
20. What are the positives of this proposal?
21. What are the negatives of this proposal?

22. Would the proposed criteria for a refund of the Land Transaction Tax higher residential rates element of the tax charge incentivise you purchase new dwellings to put that property onto Leasing Scheme Wales?

23. 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?

24. What are the positives of this proposal?

25. What are the negatives of this proposal?

Cardiff Landlord and Agent Workshop

1. Do you agree or disagree with the proposal that licensed landlords and agents should be required to provide data on rent and rent notices to Rent Smart Wales?



2. Have you provided rent information to Rent Officers?



3. What are the positives of this proposal?

019

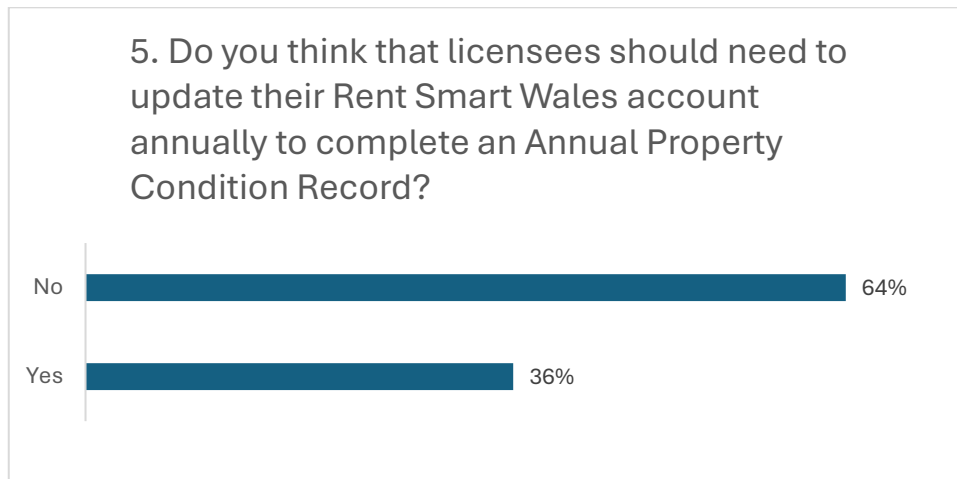


4. What are the negatives of this proposal?

019

Potential for more paperwork. Another requirement and detail to attend to.





6. How can we ensure a proportional approach for licensed landlords and agents managing a large portfolio?

- Make it easy.
- Surely a Landlord with a large portfolio will have staff working for her/him to do all this work.
- A lot of to take when you have many properties.
- They should be experienced and have a workforce if they have such a large portfolio. Smaller landlords may find it more challenging.
- To not ask for data requires additional work. i.e. data you collect is already used by the business.
- Don't know.
- Depending on size of portfolio perhaps reporting on 10% of properties.
- Not annual, bi-annual.
- If a standard and minimal reporting of required issues is required (i.e. the existence of gas safety cert) via an accessible and simply completed form/online platform.
- Put the expense on the tenant.
- Period of reporting spread over 3 years.
- No idea what the question means.
- Make the software more user friendly.
- Needs to be easy to complete.

7. What are the positives of this proposal?

0 1 1

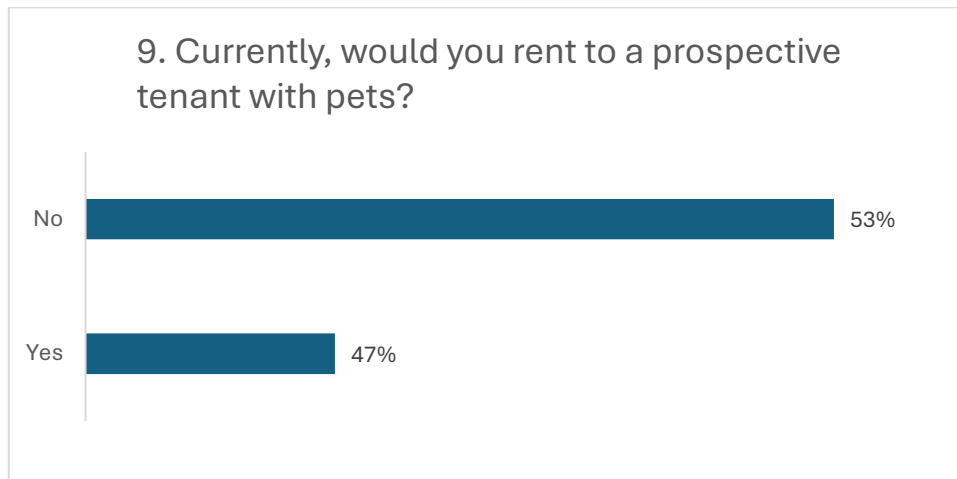
Better data
None for the landlord
Proof of safety of property
Very little as the information should already be available
Transparent
Information available for tenants
Having all the information in one place

Wordcloud poll

8. What are the negatives of this proposal?

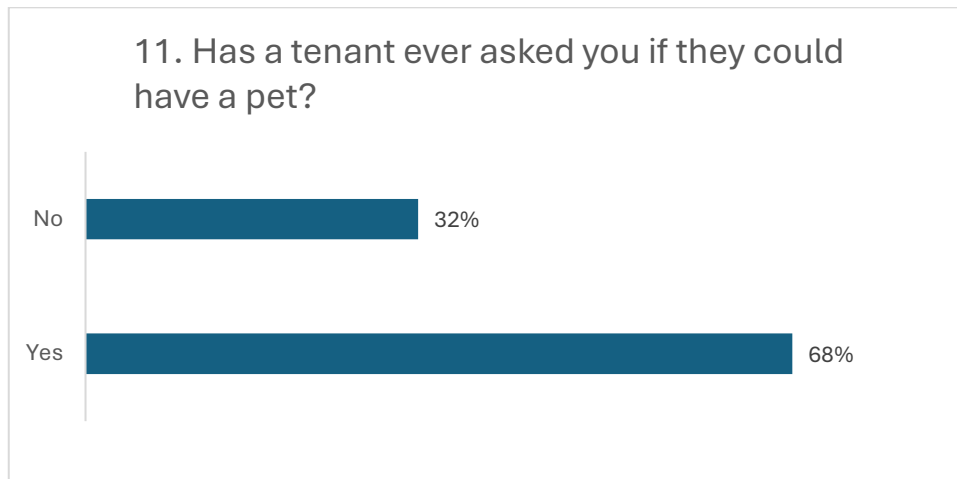
0 2 1

More expensive and time for the landlord
No need for more paperwork. Doubling work load.
More paperwork for landlords
Level landlords data
More time consuming work
tenants
duplicates may burdensome potentially Extra Workload
Time consuming
Duplicates work Extra bureaucracy work gain existing
Data misinterpreted information little type material Hassle
More compliance/duplicates work Takes to much time
Potentially more charges for agents Huge administrative burden
More expense and responsibility for landlords



10. What would you consider the largest barriers to allowing a prospective tenant to rent with a pet?

- Damage to property, potential allergies for subsequent tenants, dog noise not covered by antisocial behaviour? Smell.
- Insurance won't cover actual cost of damages.
- Damage.
- If tenant will be in to look after pet.
- Suitably of the property.
- As long as the property has garden space.
- Allergies. Whether the property is suitable. Ie with a garden space. Cats nearly always ruin sofas etc.
- Garden space/appropriateness of property.
- Tenant will not control pet. Damages, noise and costly mess when they leave. Insurance will not cover full costs.
- Fear of damage to the property and the hassle of claiming on the insurance.
- Allergies.
- Damage to property and dog / cat mess.
- Nuisance (e.g. neighbours), damage.
- Damage to properties.
- Nuisance value.
- Damage, especially to carpets.
- Increased repair & maintenance costs.
- Noise.



12. Would this proposal provide you reassurance to allow pets in your rental properties?

- No, most damage is not worth claiming. Need to get back on market ASAP rather than making claim.
- Yes as long as suitable property.
- No, pet damage can ruin an entire property. The cost in time lost after a tenant vacates is considerable. Insurance will not cover all of this.
- It would help!
- No. But the question didn't allow sometimes. Sometimes it's fine but others it's ridiculous to have a pet. Insurance and pet contracts are already available.
- No worried over insurance claims resulting in increased premiums.
- Not necessarily as insurance contracts do not universally deal with cover for pets in tenanted properties.
- Yes very positive.
- Not really.
- If tenant required to make payment.
- Maybe.
- Probably not.
- No.
- NO NO NO.

13. Are there any other measures we should consider?

- Not sure.
- Limits on numbers maybe or clause to inform landlord of pets at property
- "Rentsmart Wales or whoever should take full responsibility for pet insurance, fixing any damage, etc.
- Should be able to get rid of pet if problem.
- Increase deposit.
- Any measures to increase supply of private rented property,

- Dependent on animal and circumstances. It's very difficult to legislate and should be a flexible arrangement.
- Increase bond.
- The hassle of doing a claim, the time it takes, and the damage caused that then has to be sorted.
- No.
- Non liability of tenants.
- Let's eat them.
- Making tenants accountable too.

Wordcloud poll

14. What are the positives of this proposal?

013

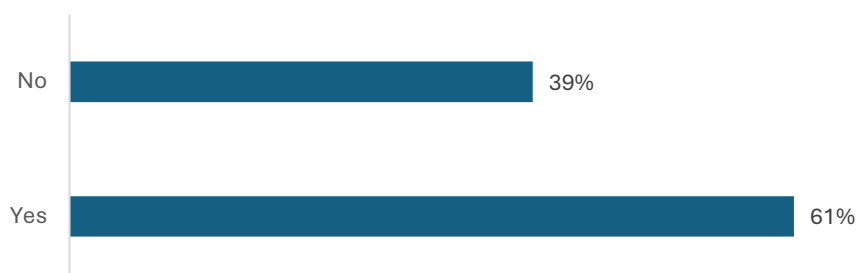


15. What are the negatives of this proposal?

0 2 1



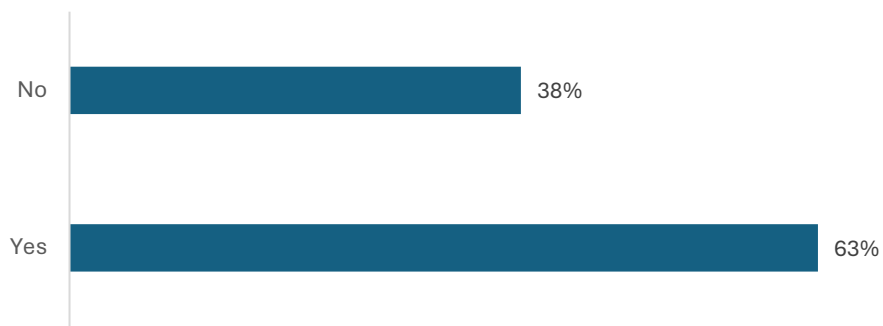
16. Have you ever asked a prospective tenant for a Rent Guarantor?



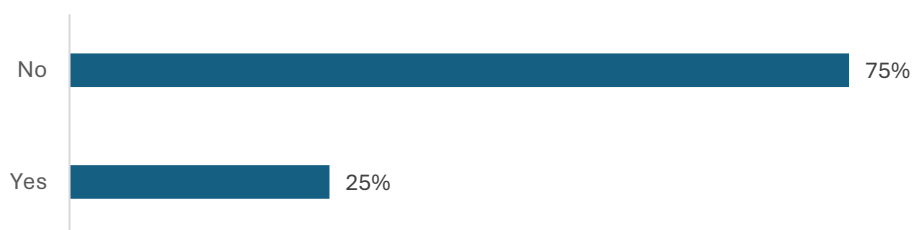
17. Would a letter of assurance from the local authority be sufficient?



18. Have you asked for rent up front?



19. Would a stronger Rent Guarantor scheme give you confidence to you not request additional rent up front to secure a tenancy?



20. What are the positives of this proposal?

0 1 3

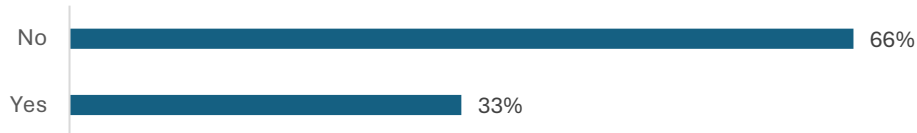
Accessible rental market for some tenants
Could help some tenants
Alice in Wonderland!
Nothing
council forfeit rent Reassurance
**Enable higher risk
tennants to rent**
deposit months lieu Hard to see any big benefits.
Tenants who don't have money will not value the house
Confidence in renting to those on benefits.

21. What are the negatives of this proposal?

0 1 2

Bureaucratic process involved in claiming
Too many high risk tenants in my property.
Status authorities) enforcement Lack of trust
deposit pay scheme hard Risks still exist
Bad tenants get properties months council
rent **Cost** problem pursuing
fails (against local Tenants won't pay
Bureaucracy cover pressed tenant everyone Cost to the local authority
affects guarantee/guarantor
Wouldn't provide reassurance to a landlord or agent
Difficulty dealing with local authorities

22. Would the proposed criteria for a refund of the Land Transaction Tax higher residential rates element of the tax charge incentivise you purchase new dwellings to put that property onto Leasing Scheme Wales?



23. 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?

- 2 years.
- 3 months.
- 3 years.
- Should be immediate as long as you have entered a contract with the authority.
- 10 years.
- 12 months - time to renovate.
- 6 months to a year.
- 6 months max.
- 12 months.
- 6 months.
- Ambiguous question.
- It can take 6 months to renovate a property so 6 months.
- Six months.

24. What are the positives of this proposal?

016

LAs have more properties in hands to meet the needs



Wordcloud poll

25. What are the negatives of this proposal?

022

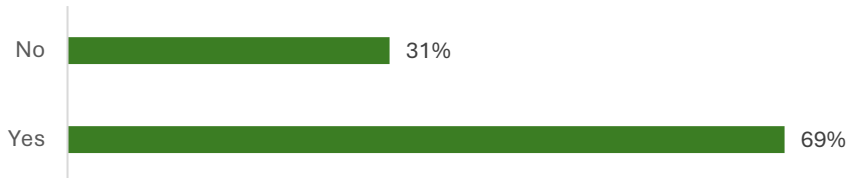
Poor management of my property by L A. Housing officers.

The initial outlay of the extra tax burden



Llandudno Landlord and Agent Workshop⁹

1. Do you agree or disagree with the proposal that licensed landlords and agents should be required to provide data on rent and rent notices to Rent Smart Wales?



2. Have you provided rent information to Rent Officers?

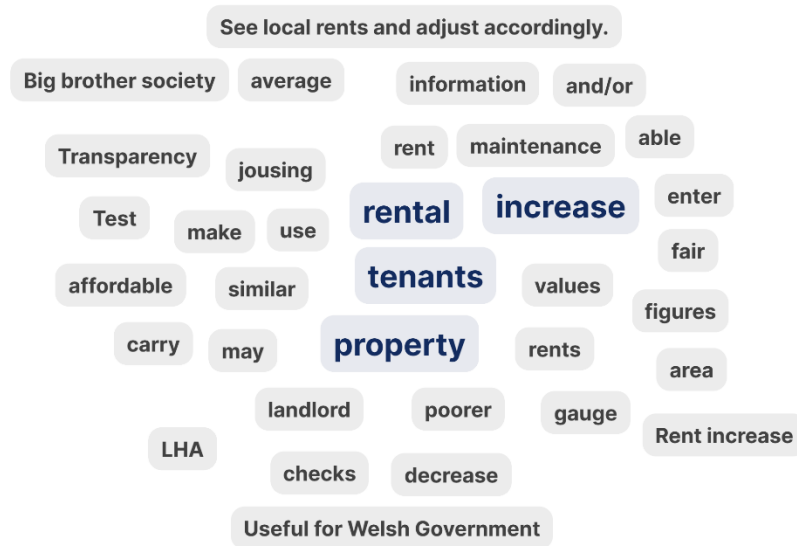


⁹ Welsh Government facilitators ran out of time in this session to include questions 22-25, however a discussion this proposal was included in the session and the notes on this are included on page [x](#).



3. What are the positives of this proposal?

Wordcloud Poll ☒ 21 responses 13 participants



slido

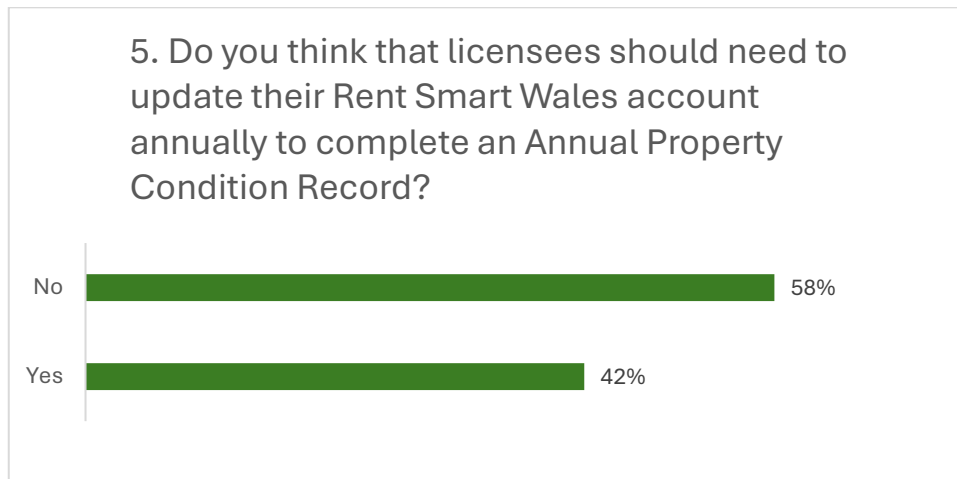


4. What are the negatives of this proposal?

Wordcloud Poll ☒ 23 responses 12 participants



slido



6. How can we ensure a proportional approach for licensed landlords and agents managing a large portfolio?

- Online and easy to complete.
- Online database.
- Make all online.
- Anon.
- Online database for all of the properties highlighting the gas safety certificate, EICR and all required documentation with due dates to aid the landlords to comply in a timely manor,
- List all properties. A database of gas tests and electrical tests.
- Dont have large portfolio. Unable to comment,
- Not a problem. If a landlord has a portfolio of enough properties to live on and save. They have the funds to cope. Proportionality isn't required.
- N/a.
- Agents and large scale landlords, will be able to deal with this as they are full time professionals.



7. What are the positives of this proposal?

Wordcloud Poll



6 responses



6 participants

Guarantee of property condition

Having written proof of property condition.

Reassurance for landlord

Written proof.

Tenants can see the gas safety and EPC before t...

Having it in writing to cover both parties

slido



8. What are the negatives of this proposal?

Wordcloud Poll



10 responses



10 participants

More paperwork added to the landlords workload.

Too much beaurocy

or

becoming

Bureaucracy

put

to

the

It

already

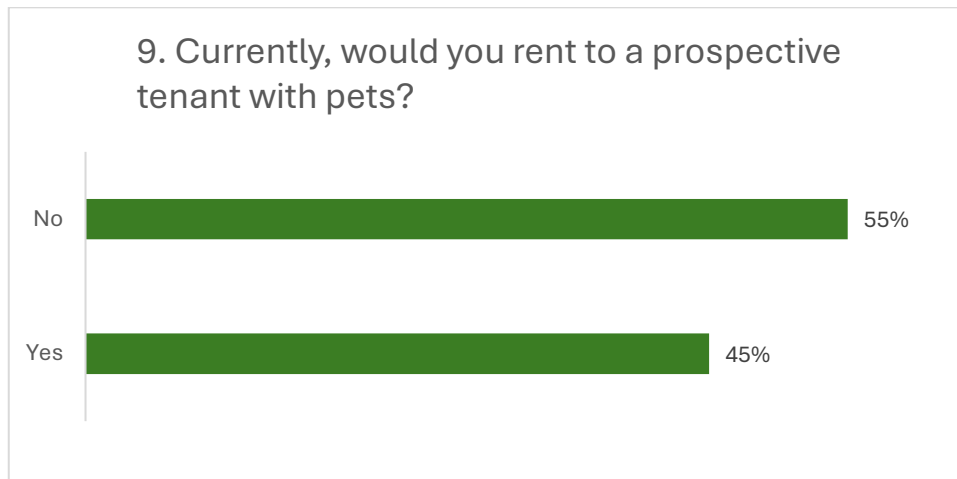
paperwork

Good

Tenants causing issues with property

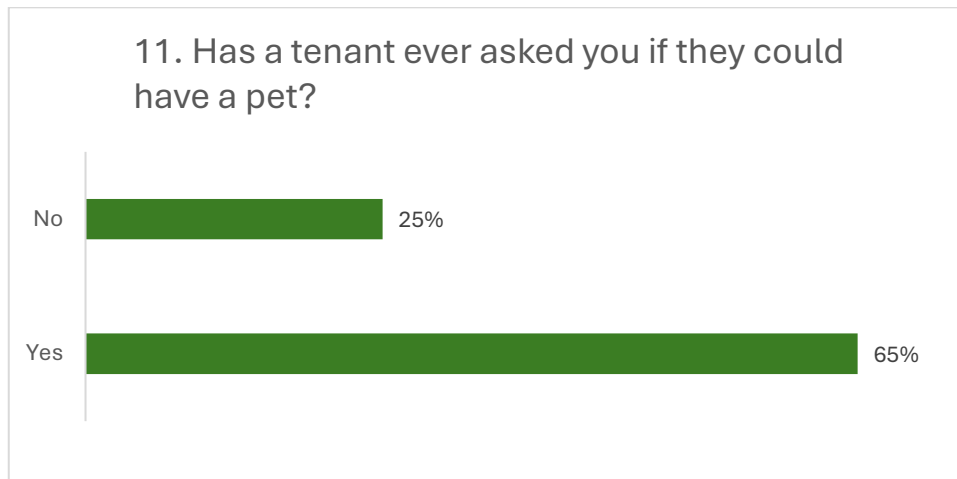
Rouge landlords not complying as usual.

slido



10. What would you consider the largest barriers to allowing a prospective tenant to rent with a pet?

- Inappropriate accommodation.
- Upsetting other flat tenants.
- Insurance for pets would increase if there was a claim If all dogs were registered perhaps I would consider.
- The accommodation may not be suitable.
- Deposit scheme doesn't pay out.
- Deposit doesn't cover damage.
- Additional damage to the property, also brings the potential of fleas and other pests entering the property.
- Damage to property.
- Noise nuisance to immediate neighbours.
- Lingering smells.
- Damage to property.
- Nuisance to neighbours.
- Nuisance to neighbours.
- Expense of fixing damage.
- Damage and safety.
- Flea possibility, from experience.
- The smell and possibly damage.
- Experience bad.
- Damage to property.



12. Would this proposal provide you reassurance to allow pets in your rental properties?

- No- should be an extra charge.
- Not applicable as we already allow pets with reason.
- No- Insurance wouldn't pay out.
- No not at all.
- I don't think so.
- Yes.
- No claims discounts.
- Insurance claims.
- I am already happy to allow pets , as long as the property is suitable and the pets are suitable.
- No.
- Perhaps.

13. Are there any other measures we should consider?

- Zero excess.
- Larger deposits.
- Much larger deposit.
- Ensure insurance has zero excess.
- No.
- Increase in the deposit required.
- Bigger deposit.
- Extra deposit.



14. What are the positives of this proposal?

Wordcloud Poll 10 responses 10 participants



slido



15. What are the negatives of this proposal?

Wordcloud Poll 19 responses 11 participants



slido

16. Have you ever asked a prospective tenant for a Rent Guarantor?



17. Would a letter of assurance from the local authority be sufficient?



18. Have you asked for rent up front?



19. Would a stronger Rent Guarantor scheme give you confidence to you not request additional rent up front to secure a tenancy?



20. What are the positives of this proposal?

Wordcloud Poll 11 responses 10 participants

It would help the tenants and give the landlord...

Partical Security for the landlord.

Rent stability for tenants

property

Guarantee of rent

landord

round

helps

Good

guarantee

provide

Rent guaranteed

Wider tenant base. Guaranteed rent.

Reassurance

Allows more people to rent

slido



21. What are the negatives of this proposal?

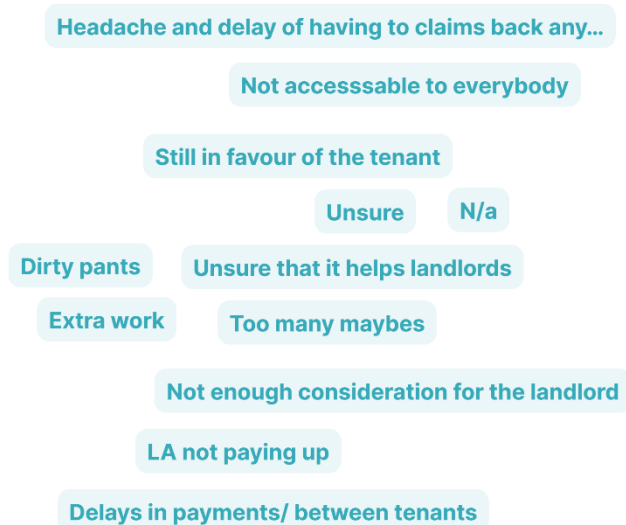
Wordcloud Poll



15 responses

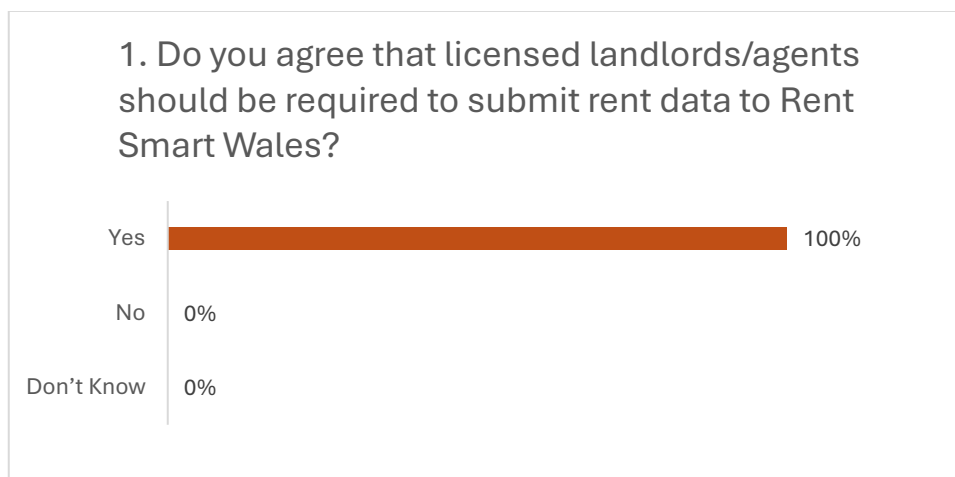


8 participants

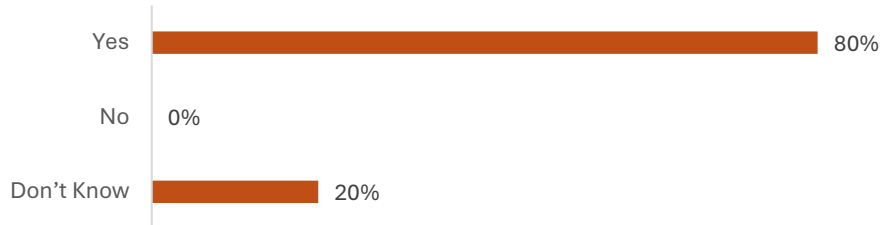


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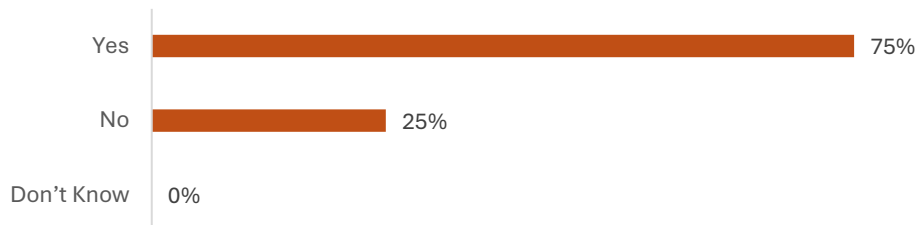
Annex A.2- Private Rented Sector Tenant Slido Responses



2. If information on average rents was publicly available, would you use it when looking for a new rental property?

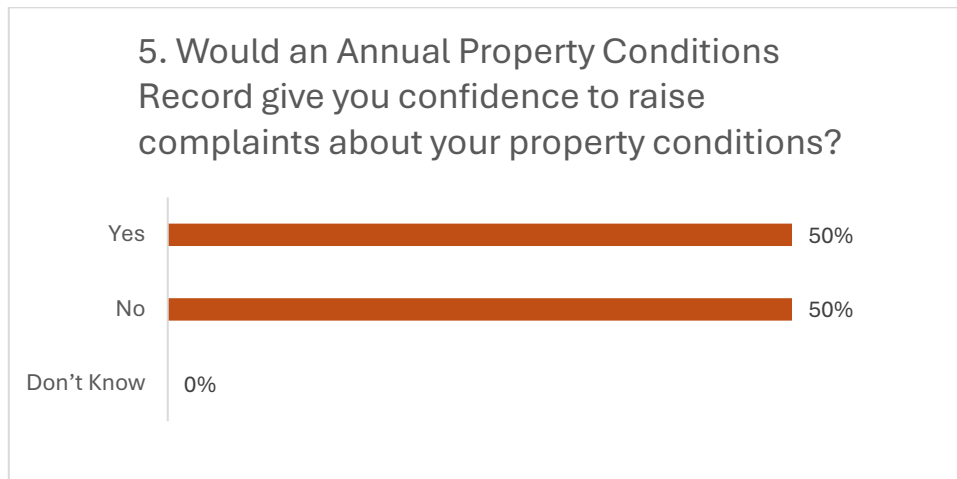


3. If there was a mechanism to challenge a rent increase, would you feel confident to do so?



4. If an Annual Property Conditions Record was available on Rent Smart Wales, would you check a prospective rental property has one before signing a rental contract?





6. What are the main barriers for you to enter and remain in the Private Rented Sector?

- Discrimination (lone parent, disabilities).
- Low market of properties , restrictions on properties size for people on benefits.
- Rent prices and lack of supply, unreasonable conditions like if you not currently employed and are looking for a job, you will use up more electricity being at home, so I won't rent to you. Or like if you're someone who will bring people over, I won't rent to you. Religion as well, saying I am Christian so if you live with me you need to live as per my Christian rules or else I am not going to rent to you, things like that shouldn't be Allowed. This level of control shouldn't be allowed.
- Income.
- Family circumstances, I.e number of children.
- Marital status.
- Housing suitability.
- Guarantors, having to provide a lot of money upfront for a holding deposit, high rents and lack of stability (threat of eviction, landlords deciding to stop renting the property out).
- Finding a place that is suitable for long-term habitation - I've often rented places that will do for six months, but it's rare to get a high-quality place without facing rent increases in the near future.
- Discrimination.
- Cost of everything.
- Rent deposits.

Annex B: Consultation questions

Q1: 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)

- Security of tenure
- Availability of services, materials, facilities and infrastructure
- Affordability
- Habitability
- Accessibility
- Location
- Cultural adequacy

Q2: 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?

Q3: 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?

Q4: 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?

Q5: 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.

Q6: 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.

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 views). Please explain your reasoning.

Q8: 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.

Q9: 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?)

Q10. 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?

Q11. Do you think spatial mapping of amalgamated rent data is useful and should be made publicly available? (Yes/No/Don't Know- Why?)

Q12. Do you think there should be a mechanism to challenge a rent increase?(Yes/No/Don't know- Why?)

Q13. Do you think license holders should be required to complete an Annual Property Condition Record? (Yes/No/Don't Know- Why?)

Q14. 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?

Q15. 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.

Q16. Do you think permitted payments would support people with pets to access the PRS? (Yes/No/Don't know- Why?)

Q17. Do you anticipate any positive or negative impacts which would result from this proposal?

Q18. 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?)

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 are fund?

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

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

