

Response to the Welsh Government consultation

Meeting the housing challenge: Building a consensus for action

Submission by the Joseph Rowntree Foundation

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The Joseph Rowntree Foundation (JRF) is one of the largest social policy research and development charities in the UK. For over a century we have been engaged with searching out the causes of social problems, investigating solutions and seeking to influence those who can make changes. JRF's purpose is to understand the root causes of social problems, to identify ways of overcoming them, and to show how social needs can be met in practice. The Joseph Rowntree Housing Trust (JRHT) shares the aims of the Foundation and engages in practical housing and care work.

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Summary: the priorities for action

We support the need for a clear housing policy vision. We define the role of housing policy as ensuring that people have access to decent, stable and affordable housing. Within this framework policy-making should be transparent and seek to avoid distorting people's tenure choices.

Meeting the housing challenge raises three key questions:

- What are the biggest housing priorities for action?
- Who needs help?
- Where can the government achieve the biggest impact with its available resources?

To answer these questions the Joseph Rowntree Foundation's (JRF) submission focuses on four priority areas for Welsh housing policy:

- the government's stewardship role of the housing market;
- improving and supporting the rented housing offer;
- tackling homelessness; and
- addressing the social justice implications of climate change.

1. *Housing market stewardship, affordability and supply*

Increased housing supply is key aspect of achieving a more stable housing system. The Welsh Government's focus on making the best use of public land is an important strategy to continue supporting new housing supply. Funding infrastructure to unlock development sites and encouraging private investment in new affordable housing are also key strategies. Reforming the existing housing association model to encourage improved asset management strategies might also lead to more flexible housing supply.

2. *Improving and supporting the rented housing offer*

The social and private rented sectors are both important facets of the housing market. The following actions are important to support growth and stability within these sectors:

- we would support a **wide-ranging tenure review of the whole housing system** to enable a more consumer focused and landlord neutral housing tenure system. Balancing the interests of both landlords and tenants within such a review is essential to the long-

- term stability of the rented sectors, particularly the private rented sector;
- **clarity of vision on the purpose of social housing** in Wales is a key priority. This should include the scope for the social housing sector to innovate in the types and flexibility of tenancies it offers for households at different life stages;
 - **brokering relationships** between those private rented sector landlords who are **willing to offer longer-term tenancies**, particularly to families and those tenants who need or want fixed term tenancies of longer than six months duration may be more successful than legislation in protecting supply of private rented homes and creating more stability for the increasing number of families likely to enter private renting;
 - policies on the private rented sector should go with the grain of the small landlord dominated private rented market. This might include Welsh Government influence on wider UK policies such as **tax allowances for private landlords who meet specified social policy objectives** such as stable (i.e. longer term), good quality tenancies at affordable rents let to households on low incomes.

3. *Tackling homelessness*

A policy and practice focus on preventing homelessness is essential. Once homelessness has occurred there are three key issues for policy and practice on homelessness:

- improved co-ordination of services which can be achieved through frontline and senior officers developing communities of practice and through national and local government leadership on the importance of this co-ordination to effectively tackling homelessness;
- more flexible, individually tailored support targeted at key points in a person's journey towards homelessness; and
- improved capacity for support agencies to more effectively address the high levels of mental distress among the multiply excluded homeless population.

4. *Addressing the social justice implications of climate change*

The gap between design aspiration and the actual performance of low and zero carbon homes needs to be reduced. A national feedback loop involving design and construction bodies, developers and landlords could provide more evidence on whether design claims are achieved in practice. Within this framework tenants should also be supported to achieve energy efficient living.

We support *meeting the housing need's* emphasis on equality between and within generations and on helping those individuals or households whose housing needs cannot be met solely by the market. Within this approach JRF sees the government as having a clear stewardship role for the whole housing market. This involves improving housing supply and aiming for policies which do not distort the operation of local markets or people's housing tenure preferences. We also see the development, implementation and review of housing policy as a shared endeavour.

Introduction

JRF welcomes the Welsh Government's consultation on the priorities for housing policy and legislation. We support the government's view that the main purpose of housing policy is to enable people to access decent quality, stable and affordable housing. We are pleased to submit a response to the [Meeting the housing challenge](#) consultation that is based on evidence from a range of JRF's research programmes including:

- The [JRF Housing market taskforce](#) which focused on longer-term policy measures that might promote a more stable housing market cycle;
- [Young people and housing](#) which is working to improve the housing offer available to young people aged 16–30 in the UK;
- [Multiple exclusion homelessness](#) which aims to better understand the relationship between homelessness and other social issues; and
- [Climate change and social justice](#) which supports the development of socially just responses to climate change in the UK.

During 2012 JRF is also commissioning further work on:

- the relationship between housing and poverty;

- what the UK can learn from how other countries bring forward land supply; and
- which innovations in financing new affordable housing are sustainable in the longer term.

Housing policy must look across the whole housing market spectrum. Taking this approach complements the operation of local housing markets and helps policy to avoid distorting people's tenure preferences. It also allows policy-makers to consider the knock-on effects of any tenure specific policies, with a keen eye on meeting the housing needs of the most vulnerable.

The policy goal of providing access to decent, stable, affordable accommodation is a shared responsibility. As such JRF supports the co-production approach where stakeholders such as practitioners, lenders, membership and community bodies and tenant representatives are key participants in developing, implementing and reviewing housing policy together with government. This approach also offers an opportunity to make sure that the housing system supports other areas of social policy and that they in turn support housing policy objectives. The role of wider social policies around the economy, regeneration, employment, education, health, social care and welfare reform are all important to achieving successful housing outcomes and more stable housing markets. Housing policy must carefully consider these inter-relationships. This is particularly true for housing policies that target those who are most vulnerable and in greatest housing need.

The housing market: stewardship, affordability and supply

The housing market stewardship role identified in *Meeting the housing challenge* brings with it a responsibility to look across the housing system when designing housing policy. It also begs the question of where housing policy should focus – is one housing tenure more deserving of greater policy attention or resource than another (Kelly and Stirling, 2011)?

Stephens suggests that the primary purpose of housing policy is to ensure that people have access to decent, stable and affordable housing (Stephens 2011). Rather than focusing on one tenure over another to achieve this, housing policy needs to acknowledge that no tenure in itself represents a

universally appropriate policy outcome (Rugg, 2010). Thus single tenure housing policies *must* consider their knock-on impacts across the housing system and have explicit objectives. Key objectives for a housing policy framework include the principles of efficiency (making the market work better), equity (fairness between people and between different generations) and sustainability over the longer term (Hall and Gibb, 2010). In addition housing policy should also aim to create:

- less volatile housing markets;
- additional support for low-income and vulnerable households; and
- additional housing investment incentives which create responsive housing supply where and when required.

(Hall and Gibb, 2010; Oxley and Haffner, 2010)

In meeting the housing challenge it is important to consider the balance between demand and supply initiatives. The volatile market and unresponsive housing supply system in the UK mean that policies which inflate demand for home-ownership risk worsening rather than improving housing market conditions (Kelly and Stirling, 2011). Changes in demand for housing are more likely to result in higher house prices than increased housing supply (Andrews, *et al.*, 2011). Likewise low-cost home-ownership options such as shared ownership have become a tenure in their own right rather than a stepping stone into full ownership (Wallace, 2008).

Increasing housing supply is a key factor in improving housing market stability. Given the long-term backlog of housing supply it is important to note that it is cumulative additions to new housing supply that are needed to improve affordability (Stephens, 2011). This means that increased housing supply needs to be maintained year on year; additional supply in any one year alone would not have an impact on affordability. More homes in the housing market sectors of home-ownership and private renting are likely to have the greatest impact on housing affordability. Although sub-market housing such as new social rented homes are less likely to affect house prices, funding new housing supply in this sector can play an important counter-cyclical role. Monk and Whitehead (2011) identify the key causes of the lack of housing supply as a lack of profitability for the private sector and reduced subsidies for affordable housing provision coupled with a generally pro-cyclical funding regime. Together with Stephens (2011) and Kelly and Stirling (2011) they suggest a range of solutions including:

- greater use of publicly owned land – but it must be a sustainable site, in the right location;
- using approaches to releasing public land such as deferred payment or risk sharing where government shares the risk but also the profit from housing development on the land;
- granting more planning permissions than needed in the hope that this brings more land forward;
- funding infrastructure to unlock more development;
- identifying housing associations that already own land suitable for development and working together to bring it forward;
- using models such as self-build, community land trusts, community mutuals and co-operatives.

A range of factors have prompted renewed focus on the role of institutional investment in increasing housing supply. Such factors have often focused debate specifically on the role of institutional investment in expanding the private rented sector. These include the private rented sector's role as a shock absorber in the wider housing market, predictions that the private rented sector will increase and rapidly declining public subsidy which restricts the growth of the social rented and wider affordable housing sector.

The long-running shortage in new housing supply identified in *Meeting the housing challenge* underlines the scale and long-term nature of the housing supply challenge. As there is no evidence that institutional investment would improve the quality or security of tenure of the private rented sector (Stephens, 2011) we suggest that public funds should not be used to underwrite institutional investment in this sector. In further support of this view we note that Ball (2010) argues that institutional investment tends to operate in niche sectors and so may not improve the housing offer for those in greatest housing need. Scanlon and Kochan (2011) also concur with Ball (2010) that the scale of institutional investment is generally small in international housing systems. Thus Kelly (2010a) argues that it may be more fruitful for housing policy to focus on brokering relationships between social housing providers and longer-term institutional investors in order to attract increased investment into the social rented sector. There is also scope to explore how this might facilitate a more diverse rented offer from social housing providers.

The links between housing policy and wider social policy functions merit further consideration in any future housing strategy. This issue is developed

further in the sections on the rented housing offer and climate change and fuel poverty. However the importance of the links between regeneration and housing is underlined in a recent JRF report highlighting [the impact of house moves](#) in supporting the regeneration of Communities First areas (Hincks and Robson, 2010). The Communities First neighbourhoods that saw most progress were those with cheaper housing which served as a springboard for households in their early years and those attracting inward moves by more affluent households. Residential mobility is a key driver of change affecting the socio-economic profile of areas. As such attention needs to be given to the wider consequences of both housing market change and housing-led regeneration in the overall trajectory of neighbourhoods.

The rented housing offer: social and private renting

Conducting a wide-ranging tenure review across the whole housing system, rather than focusing primarily on private rented housing, could enable Welsh housing policy to better reflect tenants' role as consumers and landlords as providers (Law Commission, 2006). Such an approach could enable a move to a more landlord neutral tenure system that could reduce complexity (Carr, *et al.*, 2010). This might also have the benefit of enabling social landlords to offer a broader range of housing options to prospective tenants, while continuing to protect the traditional welfare safety net role of social housing within the Welsh system. This would need to be closely linked to discussions on housing providers' ability to develop and provide new homes. Such an approach could also help to identify what housing 'products' consumers require at different stages of their life course.

A forthcoming JRF report on the [housing challenges that will face young people](#) under 30 in 2020 suggests a greater push towards the private rented sector with young people increasingly locked out of home-ownership and the social rented sector. These trends highlight the fact that young people can no longer rely on the housing options that were available to their parents. However what we learn about the housing system we tend to learn from our family and peers or our support workers (Wallace, 2010; Kelly, 2010b). Kelly (2010b) highlights how vulnerable young people can find both the perceived instability of the private rented sector *and* the lack of mobility within the social rented sector problematic. This suggests that earlier education about the housing system might help to change perceptions about renting and more closely align expectations with the reality of the

housing market. Such education could be incorporated into the existing curriculum. Terry's (2011) [improving housing outcomes for young people: practical ideas](#) showcases existing projects that work with schools to educate pupils on the reality of the housing market or on practical skills for independent living such as managing budgets and the rights and responsibilities of tenancies. Such projects do not have to be resource intensive and can build useful links between housing agencies and schools which can support wider objectives.

Policies to improve the private rented sector should work with the grain of the dominant small landlord model in the UK. They also need to balance the competing interests of landlords and tenants. Thus we must consider the instability of the private rented sector from both sides. Tenants, particularly families, would welcome greater stability. However landlords are often bound by mortgage terms which restrict the length of tenancies they can offer. This suggests that a brokering role between landlords and tenants would be valuable in improving access to, and stability within, the private rented sector, particularly for those who can no longer access social rented tenancies. Social letting agents can help broker tenancies where a tenant might struggle to meet requirements such as references for example. It also suggests a role in influencing lenders to reconsider any unduly restrictive lending practices around the length of tenancies that a buy-to-let landlord or reluctant landlord who is currently unable to sell is able to offer prospective tenants.

While we noted above that institutional investment is unlikely to achieve a better quality private rented sector product there may be a role for more targeted intervention for individual landlords. These could include tax breaks or depreciation allowances for landlords in return for meeting certain conditions such as the quality of property, length of tenancy and/or rent level. Oxley and Haffner (2010) highlight how the system works in Germany where private landlords are offered depreciation allowances in return for letting to low-income households. While this does not obviate the need for social rented housing it could help to improve the availability and suitability of the private rented sector for those households who can no longer gain access to a social tenancy. While taxation, as a reserved matter, is not solely within the gift of the Welsh Government, it could help to protect private rented sector supply even when the fortunes of the home-ownership market improve. This will be particularly crucial in areas with only a small local housing allowance market for private rented sector tenancies and

where there is competition for private rented tenancies from households with greater financial resources.

While growing housing pressure necessarily leads to a strong focus on the private rented market, the social rented sector is crucial in offering longer-term stability for households unable to compete in the housing market. Some commentators argue that as social housing has become more focused on the most disadvantaged it has also become less likely to deliver positive benefits in other areas of people's lives (Lupton, *et al.*, 2009). However a key benefit of the current safety net approach to social housing is that it does not exclude the poorest and most vulnerable households from the social housing system (Fitzpatrick and Stephens, 2007). British society is now more unequal than it was with the socio-economic gap between the circumstances of children in social housing and other tenures wider than for any previous generation (Lupton, *et al.*, 2009). This underlines the importance of the safety net role of social housing. However any policy focus on using social housing as a 'spring board to opportunity' as well as a welfare safety net will require other areas of social policy such as education, training, employment and welfare reform to work together with social housing policy.

Alongside policy consideration of what the rented housing offer should look like in Wales it is important to retain a focus on demand side policies such as labour markets (Ferrari and Rae, 2011) and on the links between housing and regeneration. A JRF- funded learning network on developing new communities also highlights the importance of the long-term stewardship of places and investing in social capital to build community development (Falk and Carley, 2012). All of these issues point to the crucial need for other areas of social policy to tackle inequality in society, together with housing policy (Lupton, *et al.*, 2009).

Preventing homelessness and helping vulnerable people

Homelessness is often the end of a journey involving other issues that eventually culminate in the loss of a home or becoming roofless. Thus the recent JRF report [*Tackling homelessness and exclusion: understanding complex lives*](#) highlights the importance of homelessness prevention (McDonagh, 2011). The role of services and support workers is also crucial in co-ordinating the myriad other agencies who can be working with a

person who is experiencing homelessness. In addition flexible, individually tailored support services are likely to be most effective in supporting people on their journey out of homelessness.

There is a strong overlap between experiences of more extreme forms of homelessness such as rough sleeping and other support needs. Nearly half of 'low threshold' support service users report experience of institutional care, substance misuse, and street activities (such as begging), as well as homelessness. This suggests that the role of other agencies such as drug or mental health services should not be underestimated in relation to preventing homelessness. Those with the most complex needs, and who were most at risk of falling through the cracks in service provision, were men in their 30s.

In highlighting the four stages in a person's journey towards homelessness the report made the following policy and practice recommendations:

- A need for improved understanding within children and family services of routes into homelessness. More support needs to be given to families experiencing homelessness to break the pattern of experiences of homelessness in early life and homelessness in adulthood. More targeted work with children who are experiencing other issues that relate to later homelessness would also be welcome.
- Key services such as mental health and drug treatments are crucial to more effective targeting of support services at key points in people's journey towards homelessness. Such services could play a more effective part in preventing homelessness.
- The most complex support needs were experienced by homeless men in their 30s. However this group are often placed in 'general needs' provision with little reference to their particular experiences such as drug/alcohol abuse, anxiety/depression issues and a high extent of childhood sexual abuse.
- Ensure more co-ordinated support. There are different patterns of need within the multiple exclusion homelessness (MEH) population. Some individuals require low-level support. However, for those with the most complex needs it becomes impossible to separate the need for housing-related support from wider issues. In these complex cases, at best services work in parallel, without properly addressing

the acute overlap of needs; at worst they work in conflict with one another. Access to the co-ordination provided through community care assessment could help ensure that all agencies play their part in the provision of a holistic package of support.

- Help professionals to learn from each other: Inter-professional education and training provides a route to integrated care and personalised support planning and a shared understanding of underpinning processes such as the Community Care Assessment and Fair Access to Care Services.

An example of research into practice: A community of practice

In West Cumbria, the Cornes research team explored ways of improving joint working around multiple exclusion homelessness by establishing a 'community of practice' (COP). This brought together different practitioners who had a real passion for the topic (not 'organisational' representatives). The initial pilot ran for four sessions and the COP is now being continued by its members (a social worker, a probation officer, a housing support worker, an advice worker, a mental health worker, a drugs worker and a researcher from the project).

Members bring practice challenges and anonymised cases to each session and seek support and help from the community. Although not common practice, this COP has actively sought to promote the inclusion of former service users by virtue of their status as 'experts by experience'. While still in the early stages of development, the COP has been described by its members as a 'lighthouse' for practice values and principles and a means of achieving real changes in approaches to joint working that are of direct benefit to people who use services (Source: McDonagh, 2011).

- Improved capacity for support agencies to more effectively address the high levels of mental distress among the multiply excluded homeless population. Psychologically informed services and environments are vital to deal with the high incidence of acute mental distress in people's lives and the frequent history of troubled

childhoods. This may involve more specialist support to facilitate more reflective practice within services.

The tackling homelessness and exclusion study highlights clear policy priorities to prevent and tackle homelessness. These centre on a more co-ordinated response to homelessness across different services and policy areas. This approach recognises the complexity of many people's experiences of homelessness. While the need for early intervention and co-ordination of services are crucial, we also need to improve the approach to joint working. There is a role for the Welsh Government in continuing to support joint working between services working on homelessness and related issues such as mental health, poverty, drug/alcohol misuse and family/relationship breakdown. Policy support for inter-professional communities of practice can be helpful in tackling homelessness on the ground.

Climate change and fuel poverty: the design-performance gap

JRF has a substantial work programme investigating the relationship between [climate change and social justice](#). We know that emissions related to housing account for more than a quarter of UK carbon emissions. Therefore improving the energy efficiency of the housing stock is a vital component of climate change mitigation strategies. However, even where low carbon approaches are sought, new homes may not deliver on intended standards as recent developments led by the Joseph Rowntree Housing Trust (JRHT) have highlighted. In the small JRHT development [Elm Tree Mews](#) where full monitoring was undertaken, dwelling heat loss was 54 per cent higher than designed and the net effect of the problems of underperformance was dwelling carbon emission rates only marginally in advance of current regulations (rather than equivalent to 2013 government targets). The report on the lessons learned (Bell, *et al.*, 2010) highlights a number of issues that need addressing including:

- improving design to ensure that buildings perform as intended and that design supports low carbon lifestyles;
- a focus on whole system performance noting the different elements of the supply chain involved in delivering new energy efficient homes;
- the planning and control of construction needs to be improved;

- improvements are required in services commissioning, testing and monitoring to ensure effective performance.

JRF's work highlights the important relationship between fuel poverty and energy efficiency policies. The two may not always work together to ensure the best outcomes for the fuel poor and the environment. However ensuring the energy efficiency of people's homes is central to developing more effective solutions to tackle fuel poverty. Two recent viewpoints by [IPPR](#) (Ekins and Lockwood, 2011) and [National Energy Action](#) (Stockton and Campbell, 2011) also call for:

- the proposed new Energy Company Obligation (ECO) funding to prioritise homes in fuel poverty, noting that the Green Deal pay as you save investment in energy efficiency is unlikely to benefit those in fuel poverty;
- more effective targeting of the fuel poor, considering the role of data matching to support this;
- a firm link between energy rebates (targeting fuel poor pensioners through the Warm Homes Discount) and investment through the ECO programme.

Places at particular risk of climate change such as flooding also need particular attention (Zsamboky, *et al.*, 2011; Houston, *et al.*, 2011). Zsamboky *et al.* (2011) highlight how the South Wales coast is one of five main areas likely to have a particularly rapid rise in sea level or to experience the greatest impact resulting from changes to sea levels. They note how this creates wider social justice implications than the quality of people's homes since climate change can damage coastal livelihoods such as those based on fishing or tourism. It can also blight whole areas where it is not cost-effective to create coastal or flood defences with the resulting crash in local prices and inability to insure homes. It is therefore crucial that climate change is taken into account in decisions on planning applications and new infrastructure in order to avoid putting more people at risk.

The nature of the built environment and housing in particular are also important considerations – older people living alone in high-rise flats may be particularly vulnerable to heatwaves, while people living in mobile homes or in basement flats may be particularly vulnerable to flooding. There is an important role for housing services to play in emergency planning and responses as local housing officers can expect to see increased demand for

support if homelessness is increased by flooding events. Housing will also be important in longer-term climate adaptation questions. The future siting of new housing developments and the design and quality of homes will be important in risk management. In the longer term there are important questions about how household insurance will be delivered when the statement of principles agreement between the government and insurance industry ends next year. JRF will shortly be publishing a Viewpoint outlining how a socially just insurance regime can be developed to take account of flood risks increasing under climate change in order to prevent the potential for housing blight where households are unable to access or afford insurance in high flood risk areas. Housing policy therefore has an important role to play in climate change adaptation strategies and the links should be considered in any future housing strategy for Wales.

Conclusions

The fundamental role of housing policy is to provide access to decent, stable and affordable housing whatever the housing tenure. We support the co-production approach to policy development, implementation and review. This is crucial to achieve a properly shared approach to meeting the housing challenge in Wales. Improved joint working between agencies can both improve the existing housing offer and provide a more effective means to tackle housing crises such as homelessness. Housing policy needs to be clear about its impact across the housing system and to fully consider the connections between other policy areas such as regeneration, employment, climate change and fuel poverty. The growing importance of the rented sectors suggests that a key policy priority will be to outline the policy role that the Welsh Government sees the social and private rented sectors playing and how it can support stakeholders to achieve these objectives. This will require a clear long-term vision for the housing system.

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