

Pwyllgor Newid Hinsawdd, yr Amgylchedd a Seilwaith /

Climate Change, Environment and Infrastructure Committee

Blaenoriaethau ar gyfer y Chweched Senedd / Priorities for the Sixth Senedd

PR65

Ymateb gan Gymdeithas Genedlaethol Landlordiaid Preswyl / Evidence from National Residential Landlords Association (NRLA)



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10 September 2021

**Subject: Consultation on the Priorities for the Climate Change, Environment and Infrastructure Committee**

Thank you for the opportunity to respond to the above consultation.

**About the NRLA**

The National Residential Landlords Association (NRLA) represents over 90,000 private sector residential landlords in England and Wales. The NRLA provides support and advice to members and seek to raise standards in the Private Rented Sector through our code of conduct, training, accreditation and the provision of guidance and updates on legislation affecting the sector.

**Responding to your consultation**

The Climate Change, Environment and Infrastructure Committee has a wide remit. However, to respond to your consultation on the committee's priorities over the sixth Senedd and indeed the immediate priorities over the next year, we have focused our response on areas pertinent to Private Rented Sector (PRS) housing.

We also acknowledge the co-written letter from the Minister and Deputy Minister for Climate Change, where they outline their priorities over the next twelve to eighteen months. While we welcome the detailed outline of housing priorities, we are concerned over the limited focus on the PRS especially given the challenges the sector is facing in relation to reducing fuel poverty and decarbonisation.

We see the two main priorities for the committee as tackling fuel poverty and the decarbonisation of homes. While there are synergies between these two priorities, the overall aims can have different outcomes. Accordingly, we hope that Welsh Government policy teams working on fuel poverty and decarbonisation will work together to ensure their work complements each other's aims.

On fuel poverty, it might be timely for the committee to consider the comments and recommendations made by the administrative advisory board on fuel poverty to monitor and review progress on action to tackle fuel poverty in Wales. We discuss some areas the committee could investigate in this consultation paper.

## Tackling fuel poverty

We would like to firstly point out that fuel poverty is a direct consequence of high energy costs and from household poverty. Those households that experience fuel poverty, are likely to have additional needs such as mental health, may require housing adaptations or support with money and benefits.

Older people, people with disabilities and tenants with other vulnerabilities are more likely to experience fuel poverty. Recognising this, the NRLA are campaigning for greater support for PRS landlords to house tenants who require adaptations. We have launched a guide for landlords, called for clearer information for landlords with regards to the Disabled Facility Grant and have called for greater cooperation between landlords and local authorities.

### Priority 1: The effectiveness of the Warm Wales Programme

The previous Climate Change, Environment and Infrastructure Committee's Inquiry into fuel poverty, established that the PRS has the highest proportion of households in fuel poverty. Estimates show that approximately 20% of all privately rented households were in fuel poverty compared with 11% of owner-occupied and 9% of social housing. The inquiry further acknowledged that these high levels were due to the age of stock with a high proportion of PRS stock being built pre-1919 compared to other tenures.

Despite Wales making progress in fuel poverty, levels remain high compared to other UK and European nations. For this reason, we believe the committee should reinvestigate fuel poverty, acknowledge progress and make recommendations on further actions.

We believe that it would be useful for the committee to investigate to what extent grants from the Warm Wales Programme on offer from the Nest and Arbed scheme have made improvements within the PRS? We would also welcome discussion into the extent that Welsh local authorities are accessing UK Government ECO funding including ECO Flex to address specific fuel poverty issues within their geographic area.

### Priority 2 Domestic energy efficiency advice and support services

As part of the Welsh Government's Fuel Poverty Strategy consultation, we welcomed the proposal for support services for tenants and homeowners to get domestic energy advice and support.

This could include:

- Ensuring people are getting a better energy deal;
- Ensuring they receive all of the entitlements they are owed by UK Government or energy companies;
- Adopting new technologies such as smart meters;
- Moving away from pre-payment meters;
- Applying for home energy efficiency measures.

Many of these issues impact tenants within the PRS, but they are also applicable to tenants living in the social sector and owner-occupied sector. The committee may wish to consider to what extent those in need of such support have been identified and supported. We would also recommend that the committee looks into if there any specific barriers across tenures to achieving these aims?

By September 2021, the strategy also proposed to outline a plan to improve winter resilience for people struggling to meet the cost of their domestic fuel needs and at risk of avoidable ill health or premature death from living in a cold home. Consideration of the extent that the winter resilience plan meets these aims should be investigated by the committee.

## **Decarbonisation of homes**

Recognising that fuel poverty and decarbonisation are different phenomena, we believe the committee should assess the extent to which the Welsh Government have introduced the recommendations made by the Decarbonisation of existing homes programme in the Better Homes, Better Wales, Better World report.

In particular, we would welcome any long-term commitments the Welsh Government are proposing in supporting landlords to reduce carbon.

We would further recommend that the committee consider how to support landlords in meeting the Minimum Energy Efficiency Standards (MEES.) The committee might like to consider,

- how will landlords with low property values, where financial incentives are less attractive, be supported?
- what role do local authorities have in supporting landlords make improvements?
- what support can be given for landlords with houses with special characteristics such as listed buildings be supported.

The NRLA is grateful for the opportunity to express our views on this consultation, and we hope that our feedback will prove useful to you. We would be delighted to further engage with you on this or on any other matters pertinent to PRS.

Kind Regards,

**Tim Thomas**

**Policy Officer**

**Swyddog Polisi**

National Residential Landlords Association

Cymdeithas Genedlaethol Landlordiaid Preswyl