



RTPI Cymru

Royal Town Planning Institute
Sefydliad Cynllunio Trefol Brenhinol

Royal Town Planning Institute
Cymru (RTPI Cymru)
Studio 107
Creative Quarter
8a Morgan Arcade
Cardiff
CF10 1AF
Tel +44 (0)20 7929 8197
email walespolicy@rtpi.org.uk
www.rtpi.org.uk/wales

31st January 2025

e-mail response sent to: PrivateSectorHousing@gov.wales

Dear Sir/Madam,

Response to: White Paper on securing a path towards adequate housing, including fair rents and affordability.

The Royal Town Planning Institute (RTPI) is the largest professional body for town planners in the UK and Europe and represents around 27,000 members in over 80 countries worldwide, with approximately 1,300 members in Wales. The Institute has been shaping planning policy and raising professional standards for over 100 years and is the only body in the UK to confer Chartered status to planners, the highest professional qualification. The RTPI champions the power of planning in creating prosperous places and vibrant communities. Our ambition is to promote healthy, socially inclusive, economically, and environmentally sustainable places.

Thank you for the opportunity to respond to the above consultation. Our planning related comments are set out below. The questions which have been answered are Q1, Q2, Q4 to Q6, Q9, Q11 and Q12. If you require further assistance, please contact RTPI Cymru on 020 7929 8197 or e-mail Mark Hand at walespolicy@rtpi.org.uk

Yours faithfully,

Mark Hand MRTPI
Director

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

If these seven factors were used to assess adequate housing, they would all be relevant. It could be beneficial to align the terminology with existing policy and approaches. For example, the [Placemaking Charter - Design Commission for Wales](#) aims to strengthen and maintain good planning practice through six placemaking principles. The principles are People and Community, Movement, Public Realm, Location, mix of uses and Identity. In particular, the Placemaking Charter defines location should be:

“Places grow and develop in a way that uses land efficiently, supports and enhances existing places and is well connected. The location of housing, employment and leisure and other facilities are planned to help reduce the need to travel”.

The Placemaking Charter’s six principles of placemaking could supplement the seven factors. Registered Social Landlords and Council housing providers should be encouraged to sign up to the charter and in doing so it would help meet the aim of delivering high quality developments.

A measurement tool is required to assess if the aims of the seven factors are being met.

Location

The indicators should include “using land efficiently”, sites should be “well connected” to jobs and amenities and transport connections. However, the factors should allow sufficient flexibility to recognise that Wales is primarily a rural nation. The location should allow for rural affordable housing, to sustain rural communities including how each location is different and the spatial distribution of Welsh speaking communities.

Habitability

It is essential that homes are being built to adequate size and energy efficiency standards from the start, or we store up issues and costs for the future. A recent RTPI article may be of interest [Cynllunio - New analysis of access to local amenities in England and Wales](#) by Georgina Nee.

Cultural adequacy

There should be an indicator to assess if placemaking is encouraging the Welsh Language and cultures to thrive. This is explained in RTPI research “Placemaking as if a thriving Welsh language mattered”. The scale and location of housing should reflect the capacity of the area to absorb growth.

Attention is drawn to the [Strengthening Welsh language communities | GOV.WALES](#) report.

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?

- **Yes - apply consistently across Wales**
- **No - regional or localised variation**
- **No views**
- **Don't know**

If so, how might this work in practice?

Yes, the measures should be applied consistently across Wales. However, the measures should recognise that Wales is primarily a rural nation and has a varied spatial distribution of Welsh speaking communities.

Q4. Should elements of the adequate housing framework apply to the owner-occupied sector? If so, how can this be made to work in practice and what issues require further consideration?

The relevant factors should apply to the owner-occupied sector. The location factors are already covered by the land use planning system and Placemaking Charter. There is merit in including other factors such as habitability, for example aligning energy efficiency and minimum size standards could improve the quality of housing stock and could increase opportunities to use grants to purchase new-build homes for extra affordable housing. The recent New [Homes](#) (Solar Generation) Bill is an

example of how improved standards across all tenures could make living costs easier to manage.

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? Please explain your reasoning.

Yes, it will be positive as it will support the aims mentioned in the Future Generations Act (2015) for planning and will support a standard across Wales.

Q6. Should there be a requirement on Welsh Ministers to draw on the seven factors of housing adequacy when drafting the strategy?

- **Yes – there should be such a requirement**
- **No – there should not be such a requirement**
- **Don't know**
- **No views**

Please explain your reasoning.

Yes, we would also support alignment with other relevant plans and strategies, including Local Housing Market Assessments.

Q9. Do you agree rent data should be collected at a local level by Rent Smart Wales (e.g. ward or postcode)? Why?

Yes, rent data will help assess the local socio-economic characteristics of an area. In addition, this will help evidence Local Housing Market Assessments.

Q11. Do you think spatial mapping of amalgamated rent data is useful and should be made publicly available? Why?

Yes, this will allow councils easier access to this data, improving the evidence for Local Housing Market Assessments.

Q 22: What, in your opinion, would be the likely effects of the white paper as proposed in this consultation be on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English.

- **Do you think that there are opportunities to promote any positive effects?**
- **Do you think that there are opportunities to mitigate any adverse effects?**

Affordable homes can help secure the future of rural communities. The scale of development needs to consider access to local facilities and should ensure the provision of affordable homes sustains rural communities and Welsh-speaking communities.