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Evidence from: Chartered Institute of Environmental Health (CIEH)

Senedd Cymru | Welsh Parliament

Y Pwyllgor Llywodraeth Leol, Tai a Chynllunio | Local Government, Housing and Planning Committee

Blaenoriaethau ar gyfer y Pwyllgor Llywodraeth Leol, Tai a Chynllunio | Priorities for the Local Government, Housing and Planning Committee

You do not need to answer every question, only those on which you wish to share information or have a view.

What do you consider to be the three most important issues the Committee should prioritise during the Seventh Senedd?

Please ensure that your response relates to matters within the Committee's remit (Local Government, Housing, Planning, Communities and Regeneration).

(<https://senedd.wales/SeneddHousing>)

What is your highest priority (Priority 1)

Housing conditions and specifically enforcement of legislation relating to rented accommodation

Please explain why this should be a priority for the Committee (Priority 1)

(We would be grateful if you could keep your answer to around 500 words).

This area should be a priority because poor-quality housing remains a significant driver of ill health, inequality and avoidable harm. The Building Research Establishment has estimated that the annual cost of this poor housing to the NHS in Wales is £67 million. The figure doubles if the definition of poor housing is widened to include all homes with a Standard Assessment Procedure (SAP) rating of 40 or less. Poor housing also results in broader economic consequences for society which the Building Research Establishment estimates at a further £100

million per annum.¹ Environmental health practitioners can support owner occupiers with housing hazards through grants and loans but their work is mainly focused on the assessment and resolution of hazards in rented accommodation and improving conditions in the private rented sector through enforcement action. They also deal with provision of disabled facilities grants to enable people to live independently in their homes and bringing empty properties back into use. Environmental health practitioners play a crucial role in identifying and addressing hazards in the home, protecting tenants and reducing pressures on health and public services. There is a need for greater recognition and resourcing of environmental health services to tackle poor housing conditions across all tenures and improve public health outcomes.

Important reforms to improve standards in the private rented sector have been introduced in Wales. Legislation delivers benefits, however, only if it is effectively enforced. The response from the Chartered Institute of Environmental Health (CIEH) to the consultation on the White Paper on adequate housing² raised concerns about relying on landlord self-declarations of property condition and highlighted that many landlords are not qualified to assess housing hazards. Local authorities require adequate resources to monitor housing conditions and ensure compliance with the legislation. This is unlikely to be achieved through market forces and requires an interventionist approach at a local level.

The Committee should focus on ensuring that local authorities have the capacity, expertise and sustainable funding necessary to enforce standards, undertake inspections and take action where landlords fail to meet their legal responsibilities. CIEH has consistently highlighted the value of landlord licensing schemes, which enable local authorities to undertake proactive inspection and enforcement rather than rely solely on tenant complaints. Strengthening existing enforcement mechanisms and supporting local authorities to make full use of their powers would help identify problems earlier and drive improvements in housing quality.

A renewed focus on enforcement would help ensure that existing legislative reforms translate into safer, healthier homes, better protection for tenants and improved public health outcomes across Wales.

What is your second highest priority (Priority 2)

Energy efficiency of the housing stock

¹ Maggie Davidson, Simon Nicol, Mike Roys, Adele Beaumont, *The cost of poor housing in Wales*, BRE Trust, July 2011.

² CIEH, [response to Welsh Government consultation on White Paper on adequate housing](#), January 2025.

Please explain why this should be a priority for the Committee (Priority 2)

(We would be grateful if you could keep your answer to around 500 words).

Improving the energy efficiency of the housing stock in Wales should be a priority for the Committee because it delivers simultaneous benefits for public health, fuel poverty reduction, housing quality and climate objectives. Poor energy performance contributes directly to cold homes, high energy bills, and damp and mould, with significant impacts on health and wellbeing, particularly for older people, disabled people and low-income households. Our response to a recent consultation on reforms to the Energy Performance of Buildings regime highlights the substantial evidence linking cold housing to chronic ill-health, accidents and preventable deaths, while noting that the wider health and economic costs of poor housing conditions are often underestimated in policy development.³

The urgency of improving energy efficiency is reinforced by the continuing cost-of-living pressures facing many households. CIEH supports higher minimum energy efficiency standards because they can reduce fuel poverty and lower domestic carbon emissions. We argue that prioritising improvements to the fabric of buildings (such as insulation and heating) has the greatest impact on thermal comfort, health, wellbeing and energy bills for tenants.

The Committee should focus on maintaining the retrofitting of existing social rental housing and accelerating energy efficiency improvements in owner occupied and private rented accommodation. We ask the Committee to try to ensure that regulatory frameworks support meaningful improvements rather than simply rely on headline performance ratings. We have emphasised the importance of high-quality assessment, competent retrofit delivery, and measures that avoid unintended consequences such as damp, mould and poor indoor air quality. Energy efficiency improvements should be delivered through a holistic approach that combines insulation, ventilation and heating improvements to create healthier homes.⁴

There is also a strong economic and environmental case for action. Improving the energy performance of existing homes will reduce household energy costs, support decarbonisation ambitions and contribute to more resilient communities. We have consistently supported

³ CIEH, [response to Ministry of Housing, Communities and Local Government \(MHCLG\) and Department for Energy Security and Net Zero \(DESNZ\) consultation on reforms to the Energy Performance of Buildings regime](#), February 2025.

⁴ CIEH, [response to MHCLG and DESNZ consultation on reforms to the Energy Performance of Buildings regime](#), February 2025.

ambitious standards for both new and existing homes, placing particular emphasis on lower energy bills and long-term carbon savings for occupants.

Prioritising energy efficiency over the next four years would help ensure that more people live in warm, healthy and affordable homes while supporting wider objectives for public health, fuel poverty reduction and net zero emissions.

What is your third priority (Priority 3)

The housing workforce

Please explain why this should be a priority for the Committee (Priority 3)

(We would be grateful if you could keep your answer to around 500 words).

Developing and sustaining the workforce required to maintain and improve housing conditions should be a priority for the Committee. Ambitious housing, decarbonisation and building safety policies can succeed only if there are sufficient numbers of skilled housing maintenance contractors, retrofit and energy efficiency specialists, environmental health practitioners and housing management staff available to deliver, regulate and support these reforms. CIEH has highlighted concerns about workforce capacity, competency and resourcing across the housing sector.⁵

The transition to more energy-efficient homes will require a significant increase in the availability of qualified contractors and supply chains capable of delivering high-quality retrofit work. We have concerns about the sector's capacity to undertake inspections and improvement works. Workforce development is both a prerequisite and a consequence of work to meet the Welsh Housing Quality Standard and competency levels will be crucial to maintaining confidence in that standard.

At the same time, local authorities require sufficient environmental health practitioners and enforcement officers to ensure housing standards are achieved and maintained. We have repeatedly highlighted the vital role environmental health practitioners play in tackling poor housing conditions, improving public health and enforcing housing legislation, while also calling for greater awareness, recognition and resourcing of these activities. England has an approved

⁵ CIEH, [response to Welsh Government consultation on implementing the Building Safety \(Wales\) Act 2026 \(relating to remediation and building heights and storeys\)](#), September 2026. CIEH, [written evidence submitted to the Senedd Local Government and Housing Committee inquiry into hazardous disrepair in social housing](#), February 2026.

Level 6 Environmental Health Practitioner integrated degree apprenticeship to help address shortages of environmental health practitioners, but Wales does not currently offer this route, despite demand from employers. The Committee should consider whether sector regulators have a workforce plan. This plan should extend beyond environmental health practitioners and consider the wider multidisciplinary workforce that contributes to safe, healthy housing, including technical officers, housing enforcement and standards teams, building control, planning, public health and other relevant regulatory and support roles. The Committee should also test whether funding enables councils both to maintain statutory capacity and to train the next generation. A clear outcome should be a national, cross-sector workforce plan for Wales, with accountable leadership, consistent annual workforce data, funded entry routes and measurable indicators of service capacity, including the workforce needed to deliver safe and healthy housing.

Recent building safety reforms contribute to the growing demand for specialist expertise. The Building Safety (Wales) Act 2026 places a range of additional burdens on the owners and managers of larger flatted developments and will greatly increase the level of enforcement activity required to police fire safety requirements in residential accommodation. We would like to emphasise the need for access to specialist legal, surveying, financial and building safety expertise, together with adequate resourcing for local authorities and building safety authorities. We have also supported the creation of a national technical support function to promote consistent implementation across Wales.⁶

Investing in workforce capacity will therefore underpin progress across multiple policy objectives, including housing quality, tenant protection, decarbonisation, fuel poverty reduction and building safety. Strengthening recruitment, training and retention across the relevant professions should be viewed as an enabling priority that will allow the delivery of safer, healthier and more sustainable homes while ensuring that legislative and policy reforms can be effectively implemented.

⁶ CIEH, [response to Welsh Government consultation on implementing the Building Safety \(Wales\) Act 2026 \(relating to remediation and building heights and storeys\)](#), September 2026.
