

# **P-06-1307 The Welsh Government should commit to the adoption of the maintenance of new housing estates by local authorities**

## Report

May 2025



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# About the Committee

The Committee was established on 23 June 2021. Its remit can be found at:  
[www.senedd.wales/SeneddPetitions](http://www.senedd.wales/SeneddPetitions)

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Current Committee membership:



**Committee Chair:  
Carolyn Thomas MS**  
Welsh Labour



**Rhys ab Owen MS**  
Independent Plaid Cymru  
Member



**Luke Fletcher MS**  
Plaid Cymru



**Vaughan Gething MS**  
Welsh Labour



**Joel James MS**  
Welsh Conservatives

The following Member attended as a substitute during this inquiry.



**Altaf Hussain MS**  
Welsh Conservatives

The following Members were also members of the Committee during this inquiry.



**Peredur Owen Griffiths MS**  
Plaid Cymru



**Jack Sargeant MS**  
Welsh Labour



**Buffy Williams MS**  
Welsh Labour

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## Chair's foreword

The Committee was keen to explore concerns about estate management charges and is grateful to residents who shared their experiences with us.

The Committee's visit to a housing development highlighted some of the problems with the current system, and the understandable frustrations for homeowners.

The evidence heard in this short inquiry makes the case for stronger regulation of management companies, to stop a relatively new problem from continuing to grow. There is good and bad practice out there, and ways to make the system fairer. But the barriers to councils retrospectively taking on the management of existing housing estates are also very real, and cannot be ignored.

The Committee's evidence gathering was completed in 2023, but since then a number of developments have delayed reporting. There have been changes to Committee membership and chairing, in Welsh Ministerial responsibilities, and then a change of UK Government last year. The Leasehold and Freehold Reform Act 2024 has affected the legislative landscape, but the incoming UK Government also signalled an intention to bring forward further legislative proposals this year. In light of all these developments, the Committee wants to now share its findings.

This report makes some recommendations for consideration by the Welsh Government, as it engages with the UK Government on further UK-wide legislation and also looks at what can be done through Welsh legislation.

The evidence from management company Greenbelt included examples of good practice to apply to future regulation, regulation which that organisation said it would welcome. It was also suggested that Wales can learn from the Scottish model of regulating this sector, and certainly there is scope for the tiers of government and homebuilders to work together to improve consistency of approach.

Robust mechanisms are also needed to ensure home buyers fully understand their obligations *before* they commit to buying a new home off plan – that they know who will manage common areas and facilities, how, and what costs to

expect. This will make the system fairer and more transparent for future purchasers, even if resolving issues for existing homeowners may not be as straightforward.

A handwritten signature in black ink that reads "Carolyn". The script is cursive and fluid, with the first letter 'C' being large and prominent.

**Carolyn Thomas MS**

Chair, Petitions Committee



## Recommendations

**Recommendation 1.** The Welsh Government should legislate for a regulatory framework that takes a more holistic and standardised approach to managing all the different types of adopted assets on a housing development, from highways and verges to parks and drainage..... Page 28

**Recommendation 2.** The Welsh Government should legislate for a regulatory framework that includes a fully transparent registration system showing who is responsible for managing every housing estate asset included in each development..... Page 28

**Recommendation 3.** The Welsh Government should work with the Welsh Local Government Association to explore the scope for a financial support package – with clear criteria attached - to allow adoption of assets in known cases where management is placing an unreasonable ongoing financial burden on residents. .... Page 28

**Recommendation 4.** In developing suitable regulatory solutions for Wales, the Welsh Government should consider lessons learnt in Scotland and evaluate practices implemented through the Property Factors (Scotland) Act 2011. This includes the provision of a written ‘statement of service’ to homeowners; clear standards and obligations for management arrangements; robust redress mechanisms; quality codes; and best practice for providing information prior to purchase..... Page 30

**Recommendation 5.** The Welsh Government should include, in its plans to regulate management of housing estate assets, how to implement common adoptable standards for public amenities, including green spaces, on new housing estates in Wales.....Page 32

## 1. The Petition

Throughout 2023 the Committee took evidence on estate management charges, after considering a petition (below) calling for these estates to be managed by local authorities. This report sets out the findings, and makes recommendations in light of developments since the inquiry was conducted.

### **P-06-1307 The Welsh Government should commit to the adoption of the maintenance of new housing estates by local authorities**

The residents of the Mill, a new estate in Canton, Cardiff are having to pay an annual fee of £102 for the maintenance of a park bordering the estate. This payment must be made alongside other maintenance payments covering the unadopted highways, green spaces etc. Residents also must pay the full council tax required. Residents are not provided with a detailed breakdown of the costs of the park, just a notice to say they must pay the fee.

The Mill was regarded as a good example of Welsh Government policy due to its status as a mixed tenure estate including affordable housing alongside freehold purchasing – therefore with the current cost of living crisis we believe that the Welsh Government should support residents on estates like The Mill by encouraging and facilitating the adoption of maintenance by local authorities and to remove these punitive charges.

The petition was submitted by Eleri Lewis, and closed on 24 November 2022 having collected a total of 267 signatures.

## 2. Background

The use of estate charges in Wales appears to have increased over the past decade.<sup>1</sup> The term ‘fleecehold’ has emerged to describe the impact on freeholders in particular, who pay charges for public facilities but do not have the same rights as long leaseholders.

- 1.** This was the second petition on estate charges that was considered in the Sixth Senedd. An earlier petition<sup>2</sup> from 2020 had called for freeholders in Wales to have greater powers to challenge estate management companies. The Minister for Climate Change responded<sup>3</sup> to that petition on 5 October 2021, and it then was closed by the Committee as the petitioner was satisfied with the Minister’s response.
- 2.** This second petition P-06-1307 calls for local authorities to adopt housing estates so that the burden of maintenance of public facilities associated with the estate falls on the authority rather than the householder. These facilities may include open areas, play parks, roads and paving, car parking areas, street lighting, landscaping, environmental initiatives such as wild flower verges, and provision of private shared sprinkler systems.
- 3.** A Welsh Government consultation on estate charges in 2020 received over 600 responses, including 566 homeowners and residents, eight developers and a number of management companies, local authorities, letting agents and property lawyers. From this it appeared that the annual amount paid in estate charges by residents in Wales varied from £50 to £500, with most in the region of £100-150.<sup>4</sup> Residents are still liable for council tax in addition to any estate charges. The Welsh Government concluded that:

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<sup>1</sup> [Estate charges on housing developments - summary of responses](#)

<sup>2</sup> [To legislate to give freeholders in new build properties the right to manage their own estates - Petitions](#)

<sup>3</sup> [Eich cyf](#)

<sup>4</sup> [Written Statement: Publication: Summary of responses to the call for evidence on estate charges \(30 November 2020\) | GOV.WALES](#)

*“It is clear from the evidence provided that the practice of estate charges does not work effectively for everyone under the current arrangements.”*

**4.** Long leaseholders have statutory rights in terms of information about service charges and an ability to challenge the reasonableness of the charges, and/or whether the service provided is of a reasonable standard via the Leasehold Valuation Tribunal in Wales (the equivalent tribunal in England is the ‘First-tier Tribunal (Property Chamber)’). Freeholders who are required to contribute to the maintenance of the estate’s communal areas and facilities do not have equivalent rights.<sup>5</sup>

**5.** The petition specifically refers to the situation at a housing development called ‘The Mill’ in Canton, Cardiff. The Mill has previously been held up by the Welsh Government as a model of good practice for new housing developments, as outlined in a 2024 report by the Senedd’s Local Government and Housing Committee on social housing supply.<sup>6</sup> Pages 24-25 of that report refer to evidence from both the Chartered Institute of Housing Cymru and the Royal Institute of Chartered Surveyors (RICS) that the Tirion Homes model of affordable social housing was “a good example of high quality place-making”.

**6.** However, the petition points out that in 2022 residents of the Mill were paying an annual fee of £102 for the maintenance of a park bordering the estate, alongside other maintenance payments covering the unadopted highways, green spaces etc, and in addition to full council tax: “Residents are not provided with a detailed breakdown of the costs of the park, just a notice to say they must pay the fee”.

## **Reforming the system – legislative developments**

**7.** Both the UK Government and the Welsh Government have recognised that the system should be reformed and made fairer, and since the Committee took evidence on this petition the Leasehold and Freehold Reform Act 2024<sup>7</sup> has received royal Assent, although the majority of its provisions have not yet come into force and will require secondary legislation.

**8.** A House of Commons briefing on Freehold Estate Management published in November 2024 explains that the Act will strengthen the rights of freehold

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<sup>5</sup> [Freehold houses: estate charges - House of Commons Library](#)

<sup>6</sup> [Social housing supply](#)

<sup>7</sup> [Leasehold and Freehold Reform Act 2024](#)

homeowners on private and mixed-tenure estates in England and Wales. In particular it would give freeholders the right to challenge unreasonable estate charges and the standard of work carried out through an application to a tribunal, and to ask the tribunal to appoint a substitute manager where their estate management company is failing. It is also designed to improve the transparency of estate charges and ensure freehold homeowners receive key information on a regular basis, as well as improve the transparency of administration charges and give freeholders the right to challenge unreasonable administration charges. It would require freeholders or developers who directly manage the estate (in other words, they do not employ an estate management company) to belong to a redress scheme.<sup>8</sup>

**9.** The House of Commons briefing also notes that in 2019 the Conservative government had said it would consider whether to introduce a statutory right for freeholders to take over estate management via a Right to Manage company. However, those provisions were not included in the Bill.

**10.** Following the General Election in July 2024, the new UK Minister for Housing and Planning, Matthew Pennycook, made a statement on 21 November 2024 on the UK Government's intentions.<sup>9</sup> He said that the legislation passed in 2024 has gaps in protections for leaseholders and freeholders, and therefore the UK Government will introduce further primary legislation this year. He said in 2025 the UK Government will consult on the measures in the 2024 Act relating to estate management charges, and bring the measures in as quickly as possible thereafter.

**11.** The UK Housing Minister also said the UK Government intends to “end the injustice of ‘fleecehold’ entirely”, and will consult in 2025 on options to reduce the prevalence of private estate management arrangements.

## **Welsh Government's legislative intentions**

**12.** The Welsh Government's June 2021 Programme for Government stated that it would:

*“Ensure that estate charges for public open spaces and facilities are paid for in a way that is fair.”<sup>10</sup>*

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<sup>8</sup> [Freehold estate management](#)

<sup>9</sup> [Leasehold and Commonhold Reform - Hansard - UK Parliament](#)

<sup>10</sup> [Welsh Government Programme for government: update \[HTML\] | GOV.WALES](#)

**13.** On 5 May 2022, the Welsh Minister for Housing and Local Government responded to a written question from Petitions Committee member Rhys ab Owen MS – who has declared a relevant interest<sup>11</sup> under Standing Order 17.24A as he was involved with promoting the petition and is one of the signatories – by telling the Senedd:

*“I have previously set out my intention to include estate management companies within our plans to introduce a mandatory registration and licensing scheme for residential property management. Doing so will provide for much greater oversight and accountability in relation to the activities of these companies.*

*I have also committed to working with the UK Government to introduce legislation on a Wales and England basis that will give freeholders equivalent rights to leaseholders in relation to such matters. This would include the right to apply to a tribunal to challenge the fairness of estate charges, and to appoint a new manager to manage the provision of services covered by estate rent charges. My expectation is that legislation introduced later in the current Westminster Parliament, in relation to the implementation of the Law Commission’s recommendations on leasehold and commonhold, will include these extra protections for freeholders.*

*The UK Government has also announced its intention to repeal Section 121 of the Law of Property Act 1925 to ensure homeowners are not subjected to unfair possession orders as a consequence of unpaid estate charges. My intention is that that this reform should also be applied in Wales as well as in England.*

*Although it is usually my preference to make legislative change for Wales in the Senedd, I believe that pursuing these joint measures through a Bill introduced in the UK Parliament will be the most efficient route to change. Such a Bill would, of course, be subject to the legislative consent of the Senedd. If for any reason UK Parliamentary legislation is not forthcoming, or*

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<sup>11</sup> [Petitions Committee 05/12/2022 - Welsh Parliament](#)

*suitable for the needs of residents in Wales, I will consider alternative means to achieve a better outcome for those for those currently subject to estate management charges.”<sup>12</sup>*

## **Provisions in a Welsh Bill on Building Safety?**

**14.** The former First Minister also confirmed in May 2022 that new building safety legislation to be introduced by the Welsh Government during the Sixth Senedd term would include a new registration and licensing scheme covering residential property management companies. He said this would “help to eliminate some of the abuses” which have arisen due to the unregulated nature of estate management companies.<sup>13</sup>

**15.** In March 2024, Julie James MS, the then Minister for Climate Change, stated that, as part of the Welsh Government’s Building Safety Programme, a Building Safety (Wales) Bill would be introduced to “establish a robust and coherent regulatory system, creating clear lines of accountability, imposing a range of statutory duties on relevant “duty-holders” in respect of the relevant parts of a multi-occupied residential building”<sup>14</sup>. She said it would “go significantly further than the building safety regime introduced in England via the Building Safety Act 2022”. On 9 July 2024, in outlining the Welsh Government’s legislative programme for the remainder of the Sixth Senedd, former First Minister Vaughan Gething again committed to introducing a Bill which would “fundamentally reform the occupation and ongoing management of multi-occupied residential buildings and address fire safety issues”<sup>15</sup>. The Bill has not yet been introduced to the Senedd, but is currently expected to come forward before September 2025.

## **Adoption by local authorities – Welsh Government position**

**16.** Petition P-06-1307 specifically calls for adoption of estate management to be taken on by local authorities. Despite the legislative reforms to estate charges, the Welsh Government has consistently said it would not give a guarantee that local authorities would be required to pick up the maintenance costs of new housing estates. In summarising responses to consultation on estate charges in November 2020, the then Minister for Housing and Local Government highlighted the

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<sup>12</sup> [Written Question - WQ85002 - Welsh Parliament](#)

<sup>13</sup> [Plenary 24/05/2022 - Welsh Parliament](#)

<sup>14</sup> [Written Statement: Building Safety in Wales \(4 March 2024\) | GOV.WALES](#)

<sup>15</sup> [Plenary 09/07/2024 - Welsh Parliament](#)



possible impact on local authorities if they were made responsible for communal areas or facilities covered by estate charges:

*"I recognise it is not simply the case that local authorities could take on these additional responsibilities in perpetuity without the necessary resources to provide for such a service. This question requires proper thought and investigation, to ensure any changes we make do not bring about unintended consequences and unforeseen adverse impacts."*<sup>16</sup>

**17.** Following a question in plenary on 24 May 2022, the then First Minister reaffirmed this, noting:

*"If a developer believed that no matter how shoddy the work they carried out, no matter how poor the standard of communal facilities it provided, there was a guarantee that the public purse would pick that up and put it right, there's no incentive at all for them to do the job in the way that we want it to be done."*<sup>17</sup>

**18.** In responding to the petition, on 1 November 2022 the Minister for Climate Change said:

*"For new estates, we will explore the practicality of using legislation to bring together the various regimes to pay for the maintenance of communal infrastructure into a single approach. This will include consideration of placing a duty on local authorities to adopt communal infrastructure in return for an appropriate payment from the developer."*<sup>18</sup>

**19.** The Competition and Markets Authority (CMA) made a number of recommendations to the Welsh Government in February 2024 in relation to the private management of public amenities on new housing estates, as part of its market study of the housebuilding sector<sup>19</sup>. It recommended that the Welsh Government implement mandatory adoption of public amenities on new estates,

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<sup>16</sup> [Written Statement: Publication: Summary of responses to the call for evidence on estate charges \(30 November 2020\) | GOV.WALES](#)

<sup>17</sup> [Plenary 24/05/2022 - Welsh Parliament](#)

<sup>18</sup> [Letter from the Minister for Climate Change, 1 November 2022](#)

<sup>19</sup> [CMA, Housebuilding market study: Wales summary, February 2024](#)

and consider options to support the adoption of public amenities on estates currently under private management arrangements.

**20.** In response, the then Cabinet Secretary for Housing, Local Government and Planning said in July 2024 that although her ambition was that local authorities should adopt public amenities on estates, she was not minded to make this a mandatory requirement, stating that:

*“Local planning authorities are best placed to determine the appropriateness of adoption of public amenities on estates in their areas.”<sup>20</sup>*

**21.** She suggested that other reforms proposed by the CMA should be sufficient to address the problems being experienced by householders subject to estate management charges, but that further action may be needed to adopt public amenities on estates currently under private management arrangements if this turned out not to be the case. She also agreed the Welsh Government should consider common adoptable standards for public amenities but that it would not be possible to develop and implement these in the short term, and said she was working with local planning authorities to see if decisions could be taken earlier in the process as to whether amenities are to be adopted.

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<sup>20</sup> Letter from the Cabinet Secretary for Housing and Local Government to the chair of the Housing and Local Government Committee [Paper 6 - Welsh Government.pdf](#)

### 3. The Evidence

The Committee first took evidence from Dr Hefin David MS, who has long campaigned on the issue of estate charges in Wales, before agreeing a terms of reference for further evidence gathering. The Committee also visited a housing development to discuss the issue with residents.

**22.** On 27 February 2023, the Committee heard from Dr Hefin David MS, who had brought forward a Members' Legislative Proposal in March 2018 for a Bill aimed at regulating estate management companies. and strengthening the ability of freeholders to challenge estate managers.

**23.** In response to that proposal, the then Minister for Housing and Regeneration, Rebecca Evans MS, committed to establishing a task and finish group to examine the issue, which reported on 17 July 2019.

**24.** Estate charges have also been raised several times in plenary. Hefin David MS raised the issue on 15 June 2021, receiving a response that the Welsh Government was considering 'all options' in addressing the matter.

**25.** On 24 May 2022, Rhys ab Owen MS raised the question of estate management following complaints from the Mill estate in Canton, Cardiff (as referenced in this petition).

**26.** In raising the matter with the First Minister on 5 December 2023<sup>21</sup>, Dr Hefin David MS welcomed the Welsh Government's support for the Senedd to give legislative consent to the UK Government's Leasehold and Freehold Reform Act, but urged the Welsh Government to go further, by establishing compulsory resident liaison committees to hold management companies to account. He also called for a duty on councils to ensure estate management charges are a last resort. He noted the work of the Petitions Committee to investigate the matter further.

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<sup>21</sup> [Plenary 05/12/2023 - Welsh Parliament](#)

## **A new – and growing – problem**

**27.** Dr Hefin David MS pointed out that evidence gathered by the Welsh Government on the age of houses being taken on by estate management companies showed that it was a relatively new, and growing, problem:

*“Collectively, the 4 management companies who responded manage a total of 164 housing estates in Wales incorporating more than 11,000 properties. One management company indicated plans for the future management of 24 new estates incorporating 4,000 properties.”<sup>22</sup>*

*“So, it’s a growing problem. But the interesting thing from residents who responded was that ‘72% of respondents indicated their properties were built between 2010 and 2020. Only 1 respondent’s property was built before 2000.’”*

**28.** Evidence from the Home Builders Federation in Wales (HBF) supported this being a growing problem for over a decade.<sup>23</sup>

**29.** Dr Hefin David MS noted that there were different kinds of management company arrangements in his constituency. In Cwm Calon in Ystrad Mynach, the housebuilder Redrow had appointed an estate management company about 10-15 years previously to manage the green areas of the estate, and the relationship between developer and estate manager was “not good”, whereas on Cefn Mably, a smaller estate, the residents themselves ran the management process, which he noted was much easier on a smaller estate of 40-50 houses.<sup>24</sup>

**30.** Dr Hefin David MS described the lack of regulation of estate management companies as “the wild west”. He welcomed the intention of UK Government to regulate estate management companies, in particular including repealing section 121 of the Law of Property Act 1925 to ensure homeowners were not subjected to unfair possession orders as a consequence of unpaid estate charges. He said it was “terrifying” for homeowners to be subject to a county court judgement and unable to sell their home if they refused to pay the fees charged.

**31.** Dr Hefin David MS pointed out that a petition in the UK Parliament in 2018 had called for stronger action than the Senedd petition – for local authorities to be

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<sup>22</sup> Petitions Committee, 27 February 2023, Paragraphs 8-10

<sup>23</sup> Petitions Committee, 25 September 2023, Paragraph 17

<sup>24</sup> Petitions Committee, 27 February 2023, Paragraph 6

required “to adopt all Public Open Space and roads on estates” - and in response the UK Government had said that would “*constitute a significant new burden and arrangements already exist to provide for upkeep in a way that can be tailored to the nature of individual developments.*” In light of the UK Government not being minded to look at that, Dr Hefin David MS thought that the Welsh Minister’s statement that there would be “*consideration of placing a duty on local authorities to adopt communal infrastructure in return for an appropriate payment from the developer*” was interesting. It went further than the UK Government was willing to go, but he noted it had some problems attached.<sup>25</sup>

**32.** The unfairness of the current situation was recognised – where for example residents of the Mill Estate were paying the same amount of council tax as those in a neighbouring estate where the council was responsible for things like bins and green space. But the Committee also explored the potential unintended consequences of a decision to place the burden on councils retrospectively.

### **Barriers to retrospective action**

**33.** There was a recognition that residents had entered into a legal agreement on taking on a new property, but that even where they were aware of estate management charges, buyers were often too far committed financially to a purchase to consider pulling out, and did not hold the power in the market to challenge these charges.<sup>26</sup> Members also acknowledged that addressing any past mis-selling to residents was not a devolved matter.

**34.** Dr Hefin David MS said it would be unrealistic to expect local authorities to take on the additional cost burden associated with that number of existing housing estates retrospectively.<sup>27</sup> He said government reluctance to go down this route was due to “the scary level of costs that would be involved.”<sup>28</sup> Cardiff Council’s Head of Planning agreed that unpicking those legal agreements would present a “heroic challenge”.<sup>29</sup>

**35.** Other complications include the fact that many housing companies, particularly smaller ones, would not be operating any more and the commuted sums required for the developers to pay the local authorities might not be available, and “*even where there are larger companies like Redrow, they would*

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<sup>25</sup> Petitions Committee, 27 February 2023, Paragraphs 18-23

<sup>26</sup> Petitions Committee, 27 February 2023, Paragraphs 48-58

<sup>27</sup> Petitions Committee, 27 February 2023, Paragraphs 14-15

<sup>28</sup> Petitions Committee, 27 February 2023, Paragraph 44

<sup>29</sup> Petitions Committee, 23 October 2023, Paragraph 53

*have already passed them to estate management companies who are not going to be willing to dispose of an asset that they're making money from"*<sup>30</sup>.

**36.** On bringing in provisions to cap fees he noted:

*"When I said in a meeting to [estate management company] Meadfleet, with them at the one community association they attended, that we planned to cap the charges, they said, 'In that case, we'll just raise our fees to whatever the cap is. So, if you cap it at £300, we'll raise all our fees to £300; if you cap it at £500, we'll raise all our fees to £500. We'll just do that', from the average, which in the petition is between around £150 and £200 at the moment. So, that's the attitude of estate management companies if you cap the fees. I think they need controlling, they need greater regulation, and that wild west is a problem."*<sup>31</sup>

**37.** Dr Hefin David MS also pointed to the practice of estate management companies being able to move charges from other parts of their portfolio:

*"So, you're paying for your grass to be cut in Cwm Calon, but if they're making a loss elsewhere or they've got overhead charges from another estate, they can charge it across their portfolio. It doesn't have to relate to the work that's being done on your estate. That's a massive issue. So, you could be living on one estate and paying for another, effectively."*<sup>32</sup>

**38.** Dr Hefin David MS was of the view that to address the issues raised in the petition by residents of The Mill, more could be achieved by politicians engaging with all the players locally than through blanket national legislation, which would come up against the barriers already raised. He cited Cwm Calon as an example of success at local level through a community liaison committee.<sup>33</sup> Lots of additional things could be done through regulation,<sup>34</sup> to stop people setting up estate management companies, bring in tribunals, cap fees, and make liaison compulsory:

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<sup>30</sup> Petitions Committee, 27 February 2023, Paragraph 16

<sup>31</sup> Petitions Committee, 27 February 2023, Paragraph 31

<sup>32</sup> Petitions Committee, 27 February 2023, Paragraph 37

<sup>33</sup> Petitions Committee, 27 February 2023, Paragraph 81

<sup>34</sup> Petitions Committee, 27 February 2023, Paragraph 82

*"I think capping fees would really help people in the Mill. Capping fees would help people in Cwm Calon. I think having access to a tribunal. One of the things that we've found, which I think should be enacted in legislation, is the requirement that developers, estate management companies, Welsh Water—whoever—are required to attend regular meetings with community associations so that they can explain themselves."*<sup>35</sup>

**39.** However, his view was that focusing on unpicking the issues relating to existing contracts could divert attention from the bigger issue of stopping the problem growing further:

*"... There's a whole host of issues that are not as simple as giving local authorities the money to take on the green land, and I think unpicking all of that diverts your attention from solving the longer term issue. You'd be trying to solve the issue of the past whilst not focusing on the real growing problem in the future, and I think that that is where the battle needs to be won now, is in the future."*<sup>36</sup>

## Defining a 'duty' on local authorities

**40.** Placing a duty on local authorities to adopt roads and green spaces also raised the issue of whether the infrastructure was of an 'adoptable standard', which was not always the case, and alongside that to agree the commuted sum payable by the developer.<sup>37</sup> Cardiff Council's Head of Planning noted that the costs involved in adopting all community infrastructure on new developments would have a knock-on effect on the amount available in council budgets for other things such as affordable housing or schools.<sup>38</sup>

**41.** Dr Hefin David MS noted that although it made sense for the Welsh Government to now see what legislative approach was taken by the UK Government, to avoid a postcode lottery effect between England and Wales, there were some ideological differences between the two administrations, with the Welsh Government seeming more inclined to do more.<sup>39</sup> He felt that the fundamental issue was to define what was meant by the proposal of 'placing a

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<sup>35</sup> Petitions Committee, 27 February 2023, Paragraph 44

<sup>36</sup> Petitions Committee, 27 February 2023, Paragraph 43

<sup>37</sup> Petitions Committee, 27 February 2023, Paragraphs 60-68

<sup>38</sup> Petitions Committee, 23 October 2023, Paragraph 40

<sup>39</sup> Petitions Committee, 27 February 2023, Paragraph 76



duty on local authorities'<sup>40</sup> as set out in the Welsh Minister's 2022 correspondence with the Committee.<sup>41</sup>

**42.** On 26 June 2023 the Committee undertook a visit with Dr Hefin David MS to a housing development in his Caerphilly constituency - Cwm Calon in Ystrad Mynach, to better understand the issues from the residents' perspective. Following that visit, residents provided Members with a list of the main issues they believed should be addressed, along with a supporting rationale for each. Their main proposals were:

- Require Councils to take over open space management directly from developers for all future developments, and from outsourced providers for existing developments;
- Implementation of appropriate legislation to effectively control Estate Management companies and protect the residents;
- Appointment of independent Ombudsman to oversee Estate Management operations and address customer concerns; and
- Council Tax discounts for residents whose open spaces are managed by local Councils but also pay Estate Management fees.

**43.** Residents said that if councils were required to take over open space management directly from developers for all future developments, and from outsourced providers for existing developments, this would negate the need to address the other points. However they recognised that any changes would need to be applied gradually, and therefore the other points can be seen as mitigating actions along the way to achieve an overall acceptable solution.

## **Council Tax discount**

**44.** Dr Hefin David MS explained to the Committee that the application of a council tax discount had been considered but discounted as impractical, not equitable and too complex to administer:

*"First of all, the council tax discount wouldn't be given to individuals, it would be done through a rebate scheme through*

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<sup>40</sup> <https://business.senedd.wales/documents/s131837/Correspondence%20from%20the%20Minister%20for%20Climate%20Change%2001%20November%202022.pdf>

<sup>41</sup> Petitions Committee, 27 February 2023, Paragraph 91

*a resident-run estate management group claiming for a rebate against the costs that they are paying out. So, what would have to happen would be that all residents would agree that the cost would be paid to whoever's doing the work—the grass cutters, whoever it is—and then, against that, you offset against council tax. The problem is, every single resident would have to agree it and then you'd have to bid for it and then you'd have to share that money out yourselves, so it becomes a very, very complex thing to do. And the irony is that the people who would probably be most able to do that would be people living in very, very large houses in very, very small estates who run their own—you know, Cefn Mably, perhaps. It wouldn't be the middle and lower income householders who would be able to do that.”<sup>42</sup>*

**45.** The Committee went on to take further evidence from Mark Harris of the Home Builders Federation in Wales (HBF), Cardiff Council's Head of Planning, Simon Gilbert, and Greenbelt, a specialist in management of public open spaces on residential developments.

### **The drivers for setting up estate management companies**

**46.** Mark Harris of HBF explained two drivers behind estate management companies, saying that the starting point for homebuilders was to minimise liability for facilities associated with housing and maximise the financial viability of development: “they're there to build houses and sell them”, and historically the expectation is that that's what people pay council tax for. But he said local authorities had become more reluctant to adopt and the costs involved late in the process were an issue:

*“I used to work for a house builder, and I'll give you an example where we were handing over a piece of public open space. We built and paid for the public open space. We then had to cover the cost of maintaining it for 30 years, and we also had to cover the cost of complete replacement of all the play equipment halfway through that 30-year period. So, that was a sizeable sum of money overall.”<sup>43</sup>*

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<sup>42</sup> Petitions Committee, 27 February 2023, Paragraph 86

<sup>43</sup> Petitions Committee, 25 September 2023, Paragraph 8

**47.** A second driver was changes to local authorities' supplementary planning guidance (SPG) arising from Local Development Plans (LDPs):

*"We're starting to see more and more supplementary planning guidance relating to open space, stating that the council will not adopt the open space, and it's for the developer, in providing it, to put forward a way in which it will be managed."*<sup>44</sup>

**48.** Mark Harris noted that expected refreshes of councils' LDPs would lead to updating of SPG that would be 10-12 years out of date, and he suspected the issue would become more common within those. He cited the example of Bridgend County Borough Council requiring open play space but not adopting the play equipment within it.<sup>45</sup>

**49.** The squeeze on public finances making local authorities reluctant to take on liability was a "considerable factor", along with the lack of resources to deal with adoption. Mark Harris pointed out that most national home builders employ a person who only deals with adoption issues, and may have at least five sites ongoing at any time, so a lot of work is involved.<sup>46</sup>

**50.** Mark Harris did not see any reason why the costs associated with adoption could not be agreed upfront.<sup>47</sup>

**51.** Simon Gilbert of Cardiff Council said that if councils did adopt assets "there will be challenges for many local authorities in Wales to provide the level and quality of service that those new residents would expect"<sup>48</sup>. He said:

*"...[commuted sums] are a fixed payment for maintenance and they are not in perpetuity. One of the benefits of a management company is that residents are more often than not responsible for that organisation and the appointment of contractors to manage and maintain the asset. That will run with the land, so that will last as long as those homes are occupied and lived in, whereas commuted sums are often for 20 years on average. So, the question would be then how would the council manage to maintain those to a standard*

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<sup>44</sup> Petitions Committee, 25 September 2023, Paragraph 9

<sup>45</sup> Petitions Committee, 25 September 2023, Paragraph 25-31

<sup>46</sup> Petitions Committee, 25 September 2023, Paragraph 13

<sup>47</sup> Petitions Committee, 25 September 2023, Paragraphs 20-23

<sup>48</sup> Petitions Committee 23 October 2023, Paragraph 7

*that the residents expect, once those commuted sums have expired, notwithstanding they are council tax payers, often.”<sup>49</sup>*

**52.** He also said that the quality of design of open spaces might suffer if local authorities adopted those assets, “to compensate for the resource implications of managing them”.<sup>50</sup>

**53.** Greenbelt, a management company for open spaces, said that it no longer took on existing developments because there was too much risk attached to the commuted sums involved. Robin Waddell explained:

*“... It just takes a few unforeseen events, some damage or windblown trees or damage to a play area, and before you know it, your annual budget for maintenance for that year or the next couple of years is seriously compromised. And what we were finding with commuted sums is that they were just dwindling very, very quickly and not sustainable. So, we’ve taken a business decision not to take that kind of business on any more.”<sup>51</sup>*

**54.** Noting the increasing challenges around sustainable drainage, Simon Gilbert of Cardiff Council thought there was a “compelling argument” for bringing together the regulatory processes for adopting and managing assets:

*“... Cardiff Council will have many streets in new developments where the highways department are managing the verges, the parks department are managing the trees in those verges, and the drainage department might be managing the swales within that highway—all within a metre of each other—and the highways department are managing the footways and the tarmac. So, we’ve got three different parts of the council all managing what is essentially the same asset.”<sup>52</sup>*

**55.** Mark Harris of HBF suggested that although people were more aware of the ‘bad news’ stories than those where the management company worked well, there had been a move away from purely contractual agreements to residents having more say in how services were provided, and with break clauses and

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<sup>49</sup> Petitions Committee 23 October 2023, Paragraph 6

<sup>50</sup> Petitions Committee, 23 October 2023, Paragraph 8

<sup>51</sup> Petitions Committee, 11 December 2023, Paragraph 106

<sup>52</sup> Petitions Committee, 23 October 2023, Paragraph 52

opportunities to change things. However he agreed there was a need for better guidance and regulation:

*“... it’s not an industry that’s necessarily governed in any way at the moment, and there are no set standards or templates to use. So, I definitely think in terms of going forward, you might not be able to solve the old problems, but in avoiding future problems, there could be some better guidance and some governance given to the industry so that there is a standard set.”<sup>53</sup>*

**56.** The Committee noted that the arrangement between Cwm Calon Community Association and the estate management company was a voluntary one. The Home Builders Federation agreed that regulating this was preferable, with residents being on the board of management companies.<sup>54</sup> Mark Harris noted that resident involvement was more the model for management companies now, but that when residents found out about this opportunity for community involvement was an issue. It should be covered before the point of sale, with buyers being given as much information as possible about likely charges, and noted there was a danger that information got lost in all the other information provided in the homeowners pack.<sup>55</sup> He also pointed out:

*“One of the grey areas that’s developed around that is that that board initially has to be set up by members of the house-building company to create the board, because there are no residents at that point, and the first 10 people who might move in may not be willing to be on the board, so sometimes, on the face of it, it looks like it’s been set up by the developer and they’ve got complete control of it, but they want to get off that board as quickly as they can. They want to encourage other people to take their positions and run that board.”<sup>56</sup>*

**57.** Simon Gilbert of Cardiff Council agreed that any management company arrangement should also be resident owned, so that they are responsible for the contractual arrangements for maintenance companies.<sup>57</sup> He saw householders’

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<sup>53</sup> Petitions Committee, 25 September 2023, Paragraph 36

<sup>54</sup> Petitions Committee, 25 September 2023, Paragraphs 39-43

<sup>55</sup> Petitions Committee, 25 September 2023, Paragraph 39; Paragraphs 50-52

<sup>56</sup> Petitions Committee, 25 September 2023, Paragraph 43

<sup>57</sup> Petitions Committee, 23 October 2023, Paragraphs 12-13

ownership of the responsibility to appoint an organisation to manage the asset as part of the solution.<sup>58</sup>

**58.** Simon Gilbert explained that under section 106 legal agreements with the developer they were responsible for setting up the green space for a period of time, with a phased five-year handover period allowing Cardiff Council to then establish that assets were adequate and maintained before the management company took responsibility. Some of the detail of management arrangements is enshrined in the legal agreements, and some is in technical guidance to the developer, which is not statutory. It was his understanding that residents would be shareholders in the management company; "... so that gives a lot more governance and control, and potentially denies the anxiety of residents that their charges will just amplify over time"<sup>59</sup>.

**59.** The Committee asked about measures in the case of a management company failing. Simon Gilbert noted this could happen as a result of costs becoming unaffordable for residents in social housing, and the legal agreements included a mechanism for a council to step in to ensure assets were maintained for a period of time. This was particularly important if there were 'life and limb' risks for example relating to drainage assets. Councils could also then seek to recoup the charges from residents, in addition to their council tax.<sup>60</sup>

**60.** Simon Gilbert flagged the risk attached for councils:

*"We've got a lot of privately maintained open spaces at the moment; should they all fail concurrently, how on earth would a local authority be able to take on that resource effectively? So, it's potentially a bit of a ticking time bomb."*<sup>61</sup>

**61.** When asked if community councillors could potentially take on a role with the adoption issues, Mark Harris of HBF thought there might be issues with that approach, but he noted that where developments included social housing there were alternative models where the registered social landlord took on a management role, where they had the resources to do so.<sup>62</sup>

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<sup>58</sup> Petitions Committee, 23 October 2023, Paragraph 13

<sup>59</sup> Petitions Committee, 23 October 2023, Paragraphs 15-19

<sup>60</sup> Petitions Committee, 23 October 2023, Paragraphs 24-26

<sup>61</sup> Petitions Committee, 23 October 2023, Paragraph 26

<sup>62</sup> Petitions Committee, 25 September 2023, Paragraph 46

**62.** A member raised concerns about the stress for residents of not knowing who was responsible for management of different areas of an estate. Simon Gilbert of Cardiff Council agreed there could be “a fair degree of confusion” with new residents of estates as to who is actually responsible for what, and good practice would be to have a more holistic approach to all adopted assets, from highways and verges to parks and drainage assets.<sup>63</sup> Mark Harris of the HBF supported the idea of a central register to show who was responsible for managing all the land and assets on every development.<sup>64</sup>

**63.** Mark Harris saw a clear role for Welsh Government in providing a policy framework to regulate the provision of services and guidance developed in conjunction with developers and management companies, and said HBF was ready to work with Welsh Government on that. Simon Gilbert of Cardiff Council also said there would be value in some standardisation of the legal agreements on management of assets.<sup>65</sup>

**64.** The Committee explored the possibility of standard ‘per square metre’ tariffs for management of public open space. Mark Harris of HBF saw advantages for its members in having consistency, but noted there might be complexities due to the different categories of land use, e.g. for sustainable urban drainage systems (SUDS) and/or biodiversity net gain. He noted that local authorities had different ways of working out their costs, and so would probably want to see some flexibility, rather than having to stick to one set of costs. He thought this would lead to better delivery outcomes.<sup>66</sup>

**Conclusion 1.** The Committee has great sympathy with the problems experienced by residents of some housing developments in Wales with estate management charges. Members would like to see swift implementation of a regulatory regime that ensures prospective purchasers in Wales do not face these problems in the future. The Committee heard evidence in favour of the Scottish system of regulation, which includes a Code of Conduct; access to tribunal; and standards relating to good communication and consultation, and obligations around financial transparency and debt recovery. Improved standards in future will benefit all residents. The Committee does however acknowledge the challenges for local authorities in retrospectively taking on unadopted assets on all existing developments. Some, but not all, of these challenges are financial in

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<sup>63</sup> Petitions Committee, 23 October 2023, Paragraph 12

<sup>64</sup> Petitions Committee, 25 September 2023, Paragraphs 64-67

<sup>65</sup> Petitions Committee, 23 October 2023, Paragraph 26

<sup>66</sup> Petitions Committee, 25 September 2023, Paragraph 76



nature. But where assets have not been adopted by the local authority, for whatever reason, it should at least be the case that the companies in charge of managing those assets are regulated tightly, that homeowners are armed with as much information as possible at all stages, and that there are robust mechanisms for redress when things go wrong. The Welsh Government has signalled an intention to introduce a registration and licensing system for residential property management companies – including estate management companies – as part of the forthcoming Building Safety Bill.<sup>67</sup> Ideally this registration system should lay the foundation for stronger regulation and greater transparency for homeowners. The Committee would also like the Welsh Government to explore what more can be done to address the most serious historical cases, where residents are facing an ongoing heavy financial burden for management of an unadopted asset. Where a package of financial support to local authorities would be enough to facilitate the adoption of an asset and relieve that burden on residents, Members would like to see this option being pursued.

**Recommendation 1.** The Welsh Government should legislate for a regulatory framework that takes a more holistic and standardised approach to managing all the different types of adopted assets on a housing development, from highways and verges to parks and drainage.

**Recommendation 2.** The Welsh Government should legislate for a regulatory framework that includes a fully transparent registration system showing who is responsible for managing every housing estate asset included in each development.

**Recommendation 3.** The Welsh Government should work with the Welsh Local Government Association to explore the scope for a financial support package – with clear criteria attached – to allow adoption of assets in known cases where management is placing an unreasonable ongoing financial burden on residents.

**65.** The Committee noted that in some cases residents were unaware of the potential burden of setting up and sitting on a management committee, for example if they were retired, and asked if local authorities should have a duty to step in in those circumstances. Simon Gilbert of Cardiff Council said;

*“I think ‘duty’ is quite a strong question, a strong word. I think there’s always the opportunity for councils to act as advisers to residents’ groups, and certainly through their local elected*

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<sup>67</sup> [Plenary 24/05/2022 - Welsh Parliament](#)

*Members, or through community councils as well in many locations in Wales. And I think there's that advisory, facilitation function—whether that's a duty or whether that's just a function of providing a service, whether it's parks, highways, drainage, it's very much a function of local government anyway to provide that service to residents, certainly. So I think inadvertently the answer's probably 'yes' to your question.”<sup>68</sup>*

**66.** The Committee also took evidence from Greenbelt, an organisation specialising in managing open space on housing developments across the UK. Starting as a spin-out from Strathclyde Regional Council, to manage woodland and public open space, the organisation had moved to also take on play equipment and drainage systems. Greenbelt operated in six local authorities in Wales, with around 2,500 properties across 25 developments and more in the pipeline.<sup>69</sup>

**67.** Greenbelt fully prices the maintenance of open space for the developer in advance and the obligation to pay is added to the homebuyer's plot transfer so there is transparency about pricing. Customer care teams and in some cases wardens also engage with homeowners from the start – Greenbelt said this engagement was a business decision, to build a long-term relationship with residents. Customers are billed the annual management charge in advance, based on expected costs, and then receive a breakdown of costs incurred at the end of the year, with balances being carried forward. Homeowners receive a plan – a “written statement of service” detailing what areas will be maintained and how, and the customer liaison team is also available to explain the charges. These tend to be repetitive year-on-year, although there could also be unforeseen costs, such as storm damage or vandalism, and those costs would be collected within the end of year reconciliation.

**68.** Greenbelt said it had seen good and bad examples of management companies and noted that, particularly for developments with complex management requirements around flooding and drainage for example, the responsibility and liability taken on by residents acting as directors of those companies was significant.<sup>70</sup>

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<sup>68</sup> Petitions Committee, 23 October 2023, Paragraph 35

<sup>69</sup> Petitions Committee, 11 December 2023, Paragraph 90

<sup>70</sup> Petitions Committee, 11 December 2023, Paragraphs 126-127

**69.** The Committee asked about dispute resolution, in cases where homeowners were unhappy with costs, and particularly in light of cost of living and inflationary pressures. Greenbelt noted that costs might be essential, for example as a planning requirement or for safety reasons, and if these could not be resolved through customer liaison then the Ombudsman service, or residents taking over, would be the ultimate options for residents.<sup>71</sup>

**70.** Greenbelt recommended that specifications for maintenance obligations were important, and to work with homeowners so that they understood those, ensure that the information was provided upfront before purchase, and that the roles and responsibilities of resident involvement in estate management was also understood.<sup>72</sup> The publication of the New Homes Quality Code<sup>73</sup> in 2022 was identified as a positive step.

**71.** Robin Waddell also thought local planning authorities should be in a position to offer advice to developers at planning stage about the right type of model for the right scale of development, and what will work.

**72.** Greenbelt acknowledged that investigation by the Competition and Markets Authority and the introduction of the Leasehold and Freehold Reform Bill had been “an eye-opener” in identifying there was a problem. The need for regulation was recognised and would be welcomed, as long as it was done in a way that did not prevent good management.<sup>74</sup>

**73.** Greenbelt recommended looking at the Property Factors (Scotland) Act 2011, as legislation which had been “broadly well received in the whole of Scotland,” and was being refined and developed.<sup>75</sup> It provided the basis for practices such as the written ‘statement of service’ which Greenbelt applied to its operations across the UK.

**Recommendation 4.** In developing suitable regulatory solutions for Wales, the Welsh Government should consider lessons learnt in Scotland and evaluate practices implemented through the Property Factors (Scotland) Act 2011. This includes the provision of a written ‘statement of service’ to homeowners; clear standards and obligations for management arrangements; robust redress

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<sup>71</sup> Petitions Committee, 11 December 2023, Paragraphs 133-134

<sup>72</sup> Petitions Committee, 11 December 2023, Paragraphs 140-141

<sup>73</sup> [New Homes Quality Code published](#)

<sup>74</sup> Petitions Committee, 11 December 2023, Paragraph 149

<sup>75</sup> Petitions Committee, 11 December 2023, Paragraph 151

mechanisms; quality codes; and best practice for providing information prior to purchase.

## **Adoption of roads**

**74.** Evidence from the WLGA's Unadopted Roads Taskforce<sup>76</sup> highlighted problems with housing estate roads and actions to address these. The five main issues identified were:

- Developments proceeding without the necessary agreements between highway authorities and developers having been completed;
- Developers and builders going into liquidation and insufficient bond monies set aside for completion of roads;
- Developments taking place over decades in some examples;
- Properties being purchased with homebuyers apparently not aware of potential ongoing highway liabilities; also
- There appeared to be a lack of consistency of expected standards across the 22 local authorities but also with the approach of developers.

**75.** The WLGA said the Taskforce, which reported<sup>77</sup> to the Minister for Transport in 2020, had produced a good practice guide for local authorities, which have powers under the Highways Act to take control of unadopted roads. It had also developed a set of common standards for developers and local authorities to apply across Wales. It said *"Ideally, all new housing developments would have adoptable highways, but it was recognised that some developments such as high rise flats and gated cul de sacs may include access strips that would not be in the public realm, and so reasonably would be managed and maintained privately alongside the communal building costs"*.

**76.** The Committee welcomes the work of the unadopted roads Task Force to develop common standards and good practice for local authorities. However it notes that general open spaces do not enjoy the legislative underpinning as highway infrastructure, which is closely linked to the provision of utilities and services to new developments. The Competition and Markets Authority report on

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<sup>76</sup> Petitions Committee, 23 October 2023, Correspondence from the Welsh Local Government Association, 12 October 2023, Item 2

<sup>77</sup> [Correspondence from the Welsh Local Government Association Annex 12 October 2023.pdf](#)

the housebuilding market, referred to earlier in this report, recommends that the Welsh Government implements common adoptable standards for public amenities on new housing estates.<sup>78</sup>

**Recommendation 5.** The Welsh Government should include, in its plans to regulate management of housing estate assets, how to implement common adoptable standards for public amenities, including green spaces, on new housing estates in Wales.

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<sup>78</sup> [Housebuilding market study final report](#)

## Annex 1: List of oral evidence sessions.

The following witnesses provided oral evidence to the committee on the dates noted below. Transcripts of all oral evidence sessions can be viewed on the [Committee's website](#).

Date	Name and Organisation
<b>27 February 2023</b>	<b>Dr Hefin David MS,</b> Senedd Member
<b>26 June 2023</b>	<b>Committee Visit to meet residents of Cwm Calon, Ystrad Mynach</b>
<b>25 September 2023</b>	<b>Mark Harris, Planning and policy adviser,</b> Home Builders Federation
<b>23 October 2023</b>	<b>Simon Gilbert, Head of Planning,</b> Cardiff Council
<b>11 December 2023</b>	<b>Robin Waddell, Development Director,</b> Greenbelt <b>Adam Cooper, Group Legal Director,</b> Greenbelt <b>Colin Thomson, Managing Director,</b> Greenbelt

## Annex 2: List of written evidence

The following people and organisations provided written evidence to the Committee. All additional written information can be viewed on the [Committee’s website](#).

Written evidence	Date
Correspondence from the Welsh Local Government Association (with annex), 12 October 2023, Item 2	23 October 2023
Research Brief, SR23/5289-1, Item 2	27 February 2023
Research Brief, SR22/4474-1, Item 2	5 December 2022
Correspondence from the Minister for Climate Change	1 November 2022