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RESPONDENT INFORMATION FORM

FIRM FOUNDATIONS: THE FUTURE OF HOUSING IN SCOTLAND

Please complete the details below and return it with your response to the above address. This will help ensure we handle your response appropriately. Thank you for your help.

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1. Are you responding: (please tick one box)

(a) as an individual go to Q2a/b and then Q4

(b) on behalf of a group/organisation go to Q3 and then Q4

INDIVIDUALS

2a. Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government website)?

Yes (go to 2b below)

No, not at all We will treat your response as confidential

2b. Where confidentiality is not requested, we will make your response available to the public on the following basis (please tick one of the following boxes)

Yes, make my response, name and address all available

Yes, make my response available, but not my name or address

Yes, make my response and name available, but not my address

ON BEHALF OF GROUPS OR ORGANISATIONS:

3. The name and address of your organisation will be made available to the public (in the Scottish Government library and/or on the Government website). Are you also content for your response to be made available?

Yes No We will treat your response as confidential

SHARING RESPONSES/FUTURE ENGAGEMENT

4. We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for the Scottish Government to contact you again in the future in relation to this consultation response?

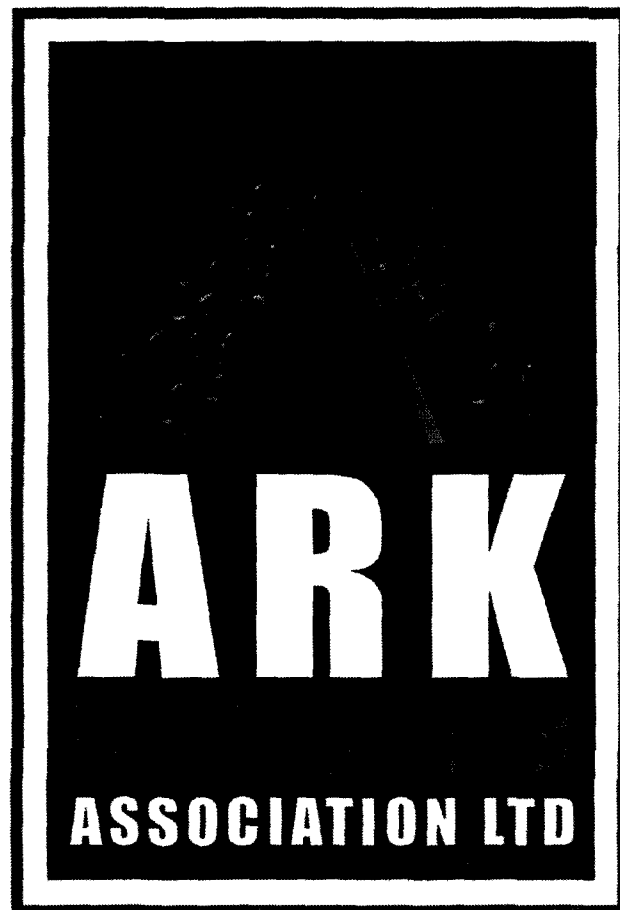
Yes No

ARK Housing Association

Consultation Response.

Firm Foundations: The Future of Housing in Scotland

January 2008



1. Executive Summary

Key Points

ARK Housing Association supports the Scottish Government's proposals to increase the supply of sustainable housing. However, we think there are three major flaws in the detailed proposals:

- They do not consider the question "Housing for whom?". The paper focuses on general needs housing and people with disabilities and other special needs are almost entirely ignored.
- The subsidy proposals concentrate on initial capital costs and ignore whole life costs thus missing opportunities for spending more now to make larger savings in maintenance and other revenue costs in the future.
- The paper does not consider the need to integrate housing design with support services for people with special needs, so that they can sustain their living at home rather than in institutions. Good design can save support costs.

However, these flaws can be removed by:

- Requiring Local Housing Strategies to incorporate the housing implications of policies for social work, health and other services, including the need for specialist design and support for those with special needs.
- Development briefs and tendering criteria to cover whole life costs as well as initial capital costs and quality criteria.
- "Quality" to be based not solely on the Scottish Housing Quality Standard but on housing being fit for purpose, including specialist design for those who need it.

Our detailed comments expand on these points.

Summary

As a specialist provider, ARK Housing Association is concerned that in the Firm Foundations document there is only one reference to the needs of people with disabilities. It emphasises the need to plan for the future supply of housing in Scotland but gives no space to considering how that might be achieved for people whose needs vary considerably from what is presented in the document.

This is very disappointing. Those who have the greatest need of a lead from Government to generate our collective thinking on their behalf are absent from this document. It is our concern that the move to decrease *subsidy through competition will have a detrimental effect on Scotland's* ability to plan and meet the needs of people with specialist requirements. The focus on home ownership will not advance the housing needs of our future tenants. We wholly support the vision for sustainable and mixed communities. These communities should also include people with disabilities many of whose housing needs will not be met through allocation but through target setting, design and site planning.

ARK believes that local partnerships in planning and development can best meet the needs of people with specialist needs. We support a tenant focused regulatory process that also protects the rights of future tenants

2. Introduction

ARK Housing Association is a specialist association offering housing and support to people with varying needs, in 12 Local Authorities throughout the east of Scotland. It has 444 tenancies and receives £11m revenue funding mainly from supporting people budgets. Many of ARK's tenants are people who either came from, or who would have been placed in, long stay institutions. ARK has also developed its stock to include housing with specialist technology to meet particular needs and core and cluster developments within larger sites. Both the attention to design and siting of housing for specialist needs can impact favourably on the revenue costs of support.

This response to the Firm Foundations paper is informed by our experience and knowledge of the needs of people who require significant support packages, either from supporting people or social work budgets and whose housing requirements will not be met simply through allocation or adaptation. It is supported by anecdotal evidence from our current service users and tenants and from those on social work waiting lists, living with their parents or inappropriately placed in hospital or care homes.

3. The Vision

The four elements of the Scottish Government vision for the future of housing in Scotland hold potential for those described in the introduction.

The document does not indicate how this might be achieved. There is no evidence that this vision includes people with specialist needs. The policy to close long stay institutions and the Changing Lives agenda has raised

both the expectation and the requirement for affordable housing and support for people who formerly lived in institutions or large care establishments. There are many people who are either in special schools or on social work waiting lists who require the Government to give a strategic lead on how their housing needs might be met and for them to be able to share in that vision.

4. Housing Supply: Chapters One and Two

ARK would wish the Government to be clearer about the long term requirements for housing for those with specialist needs. The document emphasises the problems of housing supply in pressured areas and does not acknowledge the undersupply of housing for pressured groups who require intensive support and specialist design. Many people who wait to be housed appropriately are those who cost the National Health Service in delayed discharge expenses.

We agree that high quality strategic planning is crucial. We hope that this will be demonstrated by evidence of a national lead for the development of local strategies that link social work and educational data specifically, into the Local Housing Strategies.

ARK hopes that the Government would support a more explicit expectation on developers, both private and not for profit, to meet the requirements for specialist housing as they are identified in the Local Housing Strategies.

5. First-Time Buyers: Chapter Three

The emphasis on owner occupation does not significantly address the housing requirements of those with specialist needs. These people and indeed some people with general needs, lack even the limited capital, or the disposable income, required to access low cost housing ownership. Most require affordable rented accommodation that meets their individual needs either through core and cluster developments or specialist design.

6. The Private Rented Sector: Chapter Four

The Government would like to see the private rented sector develop sufficient flexibility to cater for changing demand from different types of clients. This must include a strategic approach to developing new build rented accommodation that also includes housing for those with particular design and support needs.

7. The Future of and Investment in, Social Housing: Chapter Five and Six

ARK fully supports the statement that people of different ages, lifestyles and incomes should have their needs met in mixed tenure and mixed household neighbourhoods. However, if this is to be realised for some of the most excluded in our society, the funding and regulatory regimes require to be explicit in their support and encouragement.

The proposal to address rising subsidy levels through the competition model will not support the development of highly specified and thoughtfully planned housing for our future tenant group. The proposal will encourage bulk designed and constructed properties that will compound the problems of access to suitable housing for this group.

In addition, the effects of reducing initial capital costs through subsidy cuts have not been considered rigorously enough in relation to the effect on Housing Benefit and other costs. Spending more on initial design can reduce repair, maintenance and management costs and hence rents and Housing Benefit or revenue costs to home owners. Sometimes it can also reduce support service costs. A reduction in one compartment of the public purse will increase the cost to another through increased rents.

ARK supports a model of investment that is sympathetic to local knowledge of need and would require locally formed partnerships to create realistic targets for varying design specifications and build costs.

The proposed review of allocations guidance should seek to strengthen the link between allocation and local need driven by rigorous planning. The housing needs of people with high support needs are being overlooked because of the cost to social work revenue budgets. This situation is largely hidden and a review of the guidance should be broad enough in scope to address the issue.

Sustaining mixed communities can only be achieved through local community development. This is fundamental to supporting people who are marginalised to be part of and valued within local communities. Local community based Housing Associations play a significant role in this, particularly through their wider role activities. It is disappointing that the resource levels are to remain the same.

8. Protecting and Promoting Tenants Interests: Chapter Seven

ARK welcomes the proposal to ensure that regulation is more independent, proportionate and tenant focused. Many people with specialist requirements spend years on waiting lists only to end up as emergency placements in care homes. We would hope that the interests

of these future tenants will also be protected within the new regulatory framework.

9. Responses to Individual Questions

Q.1 Housing target

ARK agrees that there must be at least a target of 35,000 per annum but the programme must also address the question 'Housing for whom?'.

The paper mostly ignores people with special needs, such as elderly people, those with learning or physical disabilities or mental health problems whose numbers will tend to increase as people live longer, including people with disabilities. An **effective** housing supply programme must cover specialist as well as general needs housing.

Q.2 Local Authority Cooperation across regions.

ARK agrees with the paper's comment that houses of the right type must be built in the right places and its support for "homes for life". Achieving this objective requires partnership between housing, social work health and education to ensure people with special needs have both the special housing design features and the support services they require for sustainable living at home rather than in an institution and that these needs are incorporated in Local Housing Strategies from the start.

This in turn requires cooperation between different local authority services, and with other services such as health, as well as between authorities.

Q.3 Specialist national support for Local Authorities

ARK believes that the Government also needs to preserve specialist expertise in designing or adapting housing for special needs, for instance through using national specialist developers.

Q.18 Large scale competition for housing subsidy

ARK does not support this in the form proposed. ARK does support action to achieve better value for money in housing supply, but:

- The proposed form of subsidy competition will encourage bulk supply of general needs housing only, as being the simplest to produce, particularly for private developers, excluding provision of specialist housing for special needs, where numbers required will be smaller.

- Quality cannot be based solely on the Scottish Housing Quality Standard (SHQS) which is essentially a general needs standard. "Quality" also means houses which are fit for purpose in the sense of meeting the needs of those who live in them, including those with special needs.
- Building decisions must take into account whole life costs including long term revenue costs, which affect affordability. Greater initial capital investment will often save management and maintenance costs, reducing rents and hence Housing Benefit costs, or repair maintenance costs for home owners, an important consideration for those on low incomes. ARK's experience suggests this can be particularly important for some people with special needs who may have high wear and tear costs.
- The provision of support services must be integrated with housing design and adaptation to promote sustainable living. Sometimes this will also reduce support service costs.

Q.19 Alternatives to large scale subsidy competitions.

Given the factors listed under Q.18, we suggest that any competition must start with an integrated development brief, prepared in consultation with all stakeholders including representatives of tenants or owners.

The development brief should include criteria covering long term revenue costs, including environmental and neighbourhood costs and support service costs where appropriate to ensure long term best value for money.

Decisions on tenders, as for commercial projects, should be based on a weighted appraisal of both whole life costs and of quality and other objectives for the project, taking account of the needs of those living there.

These development briefs will have to be prepared locally and if stakeholders are involved, this should reduce planning problems later. However, innovation in devising proposals to meet development requirements should be encouraged and the Scottish Government should collect and disseminate good practice to encourage efficiency, lower whole life costs and quality.

Q.31 Neighbourhood Consultations

The key is the involvement of stakeholders, including tenants and house owners, in preparing the development brief setting out the requirements which the technical brief has to meet. This should concentrate minds on

the key issues. The development brief is also the key to ensuring that all costs, capital and revenue, are considered.

Q.32 ARK welcomes the proposal to ensure that regulation is more independent, proportionate and tenant focused. Many people with specialist requirements spend years on waiting lists only to end up as emergency placements in care homes. We would hope that the interests of these future tenants will also be protected within the new regulatory framework