



**Glasgow's Housing Strategy 2011-2016
GWSF Response**

Introduction

- a) Glasgow and West of Scotland Forum of Housing Associations (GWSF) is the leading membership body for community-controlled housing associations (CCHAs) in the west of Scotland. We have 57 affiliate members overall, based in 8 local authority areas.
- b) CCHAs provide decent, affordable housing for nearly 75,000 households in west central Scotland, while also improving the environmental, social and economic well being of their communities. CCHAs are led by local people, with around 800 tenants and residents serving on the management committees of CCHAs.
- c) 40 of GWSF's members are CCHAs based in Glasgow. This is the product of the local authority's pioneering policy of promoting community ownership and control in many of the city's poorest communities. And of the dedication and commitment of voluntary management committees of local people across Glasgow, who have provided leadership and strong stewardship of the public and private investment made in their communities.
- d) CCHAs are now Glasgow's largest landlord grouping, owning around 58,000 of the city's 110,000 social rented houses. GWSF members own 53,500 houses in the city.

LHS Consultation Questions

1. Do you agree with the overall strategic direction of the Local Housing Strategy 2011-2016?

LHS Principles

- 1.1. We strongly support the four principles that underpin the draft LHS (equality, sustainability, health and partnership).
- 1.2. All four principles are of equal importance. CCHAs are particularly keen to:
 - Work closely with the Council on improving energy efficiency and reducing fuel poverty, and to
 - Develop much stronger connections in the years ahead between health and housing, in particular the part that Glasgow's unique CCHA network can play in supporting the delivery of better health outcomes, in partnership with statutory services.

Strategy for housing investment

- 1.3. We welcome the City Council's continued commitment to delivering 10,000 new homes to be built by community-based housing associations (CBHAs) through the reprovioning and core programmes, 3,000 houses to be built by GHA.
- 1.4. As noted in the draft LHS, there is currently a shortfall of 3,500 houses in relation to the CBHA target. Our members have a number of concerns about this:
 - Scottish Ministers have told us that they recognise the importance of the 13,000-house target. But this is not reflected in either the level of resources the Scottish Government is making available to Glasgow, or in its decision to retain a subsidy benchmark of £40,000 per house.
 - The LHS refers to the 10,000 **CBHA** New Build Programme. In practice, there has been a long-term trend for the City Council to channel investment funding through national and regional RSLs rather than CBHAs.

CBHAs received **88%** of Housing Association Grant funding in Glasgow in 2002/03. But CBHAs will build **less than a third** of all new houses approved in 2011/12 by the City Council and **only 22%** of the new housing approved by the Council and the Scottish Government combined.

- 1.5. In the new resource environment we now face, substantial delays in delivering on this central element of the LHS would seem to be inevitable. We have noted with concern recent press reports about the diversion of TMDF resources from Glasgow to other local authority areas, and wait to see if this is confirmed when the Scottish Government presents its detailed budget proposals for the next three years to Parliament.
- 1.6. There is currently great political and financial uncertainty about how housing investment strategy in Glasgow will go ahead in the next three years. We would like to see this uncertainty removed, with the Council and the Scottish Government resuming constructive discussions about the future road map and financial strategy for housing investment in Glasgow, in consultation with other key stakeholders such as the city's CBHAs and GHA.

Regeneration

- 1.7. The LHS sets out an ambitious programme for regeneration, against a backdrop of a sustained downturn in the housing market and major reductions in public spending.
- 1.8. As stated in our response to the most recent SHIP in November 2010, GWSF members are keen to ensure that smaller area regeneration programmes receive some level of continuing support, to ensure that previous regeneration investment continues to be sustainable.
- 1.9. A number of our members have expressed concern that there is no obvious way forward for a number of long-standing regeneration priorities, in particular New Neighbourhood Initiatives, beyond the intention to "monitor and support".
- 1.10. The proximity of some sites in NNI areas and elsewhere to existing RSL neighbourhoods makes this a concern in terms of negative impacts on neighbourhood quality and sustaining previous investment.

- 1.11. We do not agree with the suggestion on page 18 that Scottish Government investment policy may lead to restructuring among the city's social landlords. This would be far more likely if large numbers of housing associations were highly dependent on development activity in the period ahead.
- 1.12. The reality is that many CCHAs will choose not to develop at all, because the terms on which the Government is making funding available are financially unsustainable and would jeopardise the long-term interests of our members' tenants and financial viability.
- 1.13. The draft LHS states (page 25) that 61% of housing owned by RSLs in the city fails to meet the SHQS. This at odds with the Scottish Housing Regulator's published data which states that only **16.1%** of RSL housing in Glasgow did not meet the SHQS at the end of 2010/11.
- 1.14. The draft LHS draws on the most recent HNDA report in stating that there is "a significant shortfall of social housing in the city". We agree that this is what the HNDA says, but the Main Issues Report for the Local Development Plan (also the subject of consultation at the present time) appears to offer a more equivocal view than the LHS about the need for additional social rented housing in the city.
- 1.15. The LPD Main Issues Report also raises some interesting questions about land, in particular by raising the possibility of other options and uses for stalled private sector sites. It would be useful for this to be examined further as part of the implementation plan for the LHS.
- 1.16. The LHS refers to targets for intermediate housing. At this stage, we are assuming that this relates to home ownership products (as per the 2010 SHIP) rather than to mid market renting. We have also assumed that the Council's strategy on mid-market renting will be informed by the results of the recently commissioned research study.
- 1.17. The proposed outcome on improving neighbourhood quality is welcome but needs to be articulated in a much broader way. In particular, there is growing recognition that existing methods of planning and delivering public services need to be more holistic by joining up public services at neighbourhood level and by improving community engagement and accountability. This is not really addressed in the LHS beyond references to community planning, which in our members' experience has significant weaknesses as a vehicle for driving improvements at neighbourhood level.

- 1.18. It would also be useful to recognise that emerging policy issues such as preventative spending and Reshaping Care need to be factored into thinking about how to improve neighbourhood quality in the city's most disadvantaged communities.

Access and support

- 1.19. We recognise that the Abolition of Priority Need in 2012 will place increased demands on housing associations to provide accommodation.
- 1.20. It would be useful for the LHS to recognise the recent agreement to review and improve the current Homelessness Duty Protocol, and how it is put into practice by both the Council and housing associations.
- 1.21. GWSF is broadly supportive of the Council's wish to develop housing options services in the city. However, it is critical that services are shaped by hard evidence and the quality of outcomes for service users.
- 1.22. Therefore, we think it is premature to conclude that greater use of private rented accommodation will lead to better outcomes for some homeless households. This reflects the structure of the PRS in Glasgow, the significant physical and management problems that exist in the PRS, and the affordability issues and lesser security for tenants. The Council's intention to form a Private Rented Sector Housing Forum is welcome, but needs to be linked to a more robust system of standard-setting, monitoring and enforcement which is capable of being delivered in practice.
- 1.23. The broad strategic direction set out on access to housing support and property adaptations is welcome, but the LHS does not address questions of funding.
- 1.24. These are likely to present significant constraints in relation to achieving the objectives that are set out, without substantial policy and financial change. For example, by directing future Re-Shaping Care savings into community- and home-based services such as property adaptations, rather than acute or residential services.
- 1.25. Given the passage of time since the common housing register was last discussed at city-wide level, we would like to see future discussions drawing on the lessons learned from the proposed North West

Glasgow Pathfinder and other relevant evidence (e.g. the common application procedures that have operated in Easterhouse for several years).

- 1.26. The LHS refers (page 39) to the introduction of choice-based lettings, citing the example of two RSLs (which have considerably above average levels of lower demand housing). We are not clear whether the LHS is suggesting that the adoption of CBL on a wider scale is desirable, or what the rationale for this would be. Further discussion on this issue is essential.

Community ownership

- 1.27. We welcome the statement in the LHS that further Second Stage Transfers remain a long-term strategic priority for the Council.
- 1.28. The LHS suggests that “further transfers are currently not financially viable at this stage”. We suggest that this should be kept under close review by the Council as part of its monitoring of the 2003 stock transfer agreement. And that the Council, GHA and CCHAs should discuss how GHA tenants interested in examining community ownership at a future date would be able to express and take forward any future tenant interest in the community ownership option.

Private rented sector

- 1.29. The draft LHS notes that some parts of the city suffer from significant concentrations of poor quality older private housing.
- 1.30. The LHS describes the Council’s HRA declaration policy at length. It would be useful if the final LHS could clarify future intentions in this regard, since the Council has not used its HRA declaration powers since the new legislation was introduced.
- 1.31. There is, in our view, a pressing need to be more proactive in the use of these powers in some parts of the city.
- 1.32. GWSF has suggested previously that new approaches to the use of compulsory purchase powers are needed, to make comprehensive improvement of the poorest quality stock fundable in the present financial climate.

- 1.33. The LHS proposes that the Council will form multi-disciplinary teams to address these issues. This is welcome since poor management practice by private landlords is in our view a growing problem in many communities, and has highly damaging consequences for individual tenants and wider neighbourhoods.
- 1.34. Feedback from our members is that this approach must also be linked to significant improvements in enforcement action by the Council, using its existing statutory powers.
- 1.35. Overall, we see the private rented sector as one of the city's major housing problems in terms of physical quality, standards of management and impact on communities.
- 1.36. We think it is essential that the Council has sufficient resources to address these issues, and gives as much priority to addressing poor private landlord practice as is possible.
- 1.37. We would also urge the Council to put in place robust and effective systems for ensuring the quality of any private rented accommodation it uses as part of housing options service development.

Delivery

- 1.38. The chapter on delivery sets out clearly the challenges that the future holds, and the need for new ways of working between the Council and its many partners. GWSF looks forward to working positively with the Council in exploring further the issues you have raised.

2. Have we identified the right outcomes in the strategy under each theme?

- 2.1. It is difficult to comment fully on this part of the LHS, since the associated indicators, targets and timescales are not available at this stage (page 50 of the draft states that these will be identified as the Strategy is finalised).
- 2.2. We are broadly in agreement with the outcomes described throughout the LHS and summarised in pages 51-57 of the document.
- 2.3. We have some comments on the detail of the proposed outcomes:

a) The LHS cites the current SHQS as the quality benchmark for housing in all tenures.

We understand the reasoning for this. However, the SHQS will not be enforceable or readily measurable other than for social rented housing.

b) The actions associated with the “improved neighbourhood quality” outcome should be considerably wider in our view.

We would like to see the LHS making much stronger connections between housing and wider goals for our neighbourhoods.

For example, in relation to health outcomes, tackling worklessness and inequality, and in addressing how public services in the city are likely to change in the period ahead.

We recognise from our involvement in “Future Glasgow” discussions led by the Council that this is an evolving agenda, and it is one where the city’s network of CCHAs can make a significant contribution at neighbourhood level.

c) We think the outcome on access to housing is too narrowly drawn.

In our view, this outcome should cover maximising access to/ making the best use of available housing, and the quality of outcomes for people seeking housing.

The sustainability of tenancies and preventing homelessness are also important as outcomes and should apply to all tenancies, not just those created for homeless people.

- d) **We are not sure why the development of a city-wide common housing register is identified as an outcome, when it is really an action.**

As stated earlier in our response, we think it is vital that the Council re-engages with landlords across the city and reviews the available evidence, in progressing its proposals for a citywide common housing register.

- e) **We support the proposed outcome on independent living and support.**

However, we are not sure how this can be achieved in light of the deep cuts which many support providers are reporting in funding for lower-level support services.

- f) **As noted above, some of the actions associated with the homelessness outcome are equally relevant to all tenancies.**

It would also be useful for the actions table to record the agreement to revise the Homelessness Protocol and how it is implemented.

- g) **We are not sure what specific actions the LHS is proposing in relation to the outcome on the Scottish Social Housing Charter and service quality for tenants.**

These are matters for which individual landlords will have primary responsibility.

- h) **We welcome the proposed formation of a private rented sector forum in the city.**

Given the major issues of poor physical quality and poor management in some parts of the city's PRS, we would like to see the LHS being more comprehensive in addressing these issues and the associated question of enforcing existing legal obligations.

3. We need our partners to help us deliver our strategy – are there any other key actions which we should identify for our partners to help us deliver our outcomes?

- 3.1. With the vast majority of Glasgow's CCHAs as our members, GWSF looks forward to playing a significant role in facilitating strategic dialogue and partnerships between the Council and our members. We have realigned our operating structures and resources to address this.
- 3.2. At the same time, we think it is important for the Council and other public bodies to reflect on how they can best engage with CCHAs, not just at citywide level but also at local level.
- 3.3. In that regard, we welcome the intention stated in the LHS of examining how existing structures such as the Local Housing Forums and Essential Connections Forums contribute to that.
- 3.4. Given the major changes in finance and policy that lie ahead, we think these structures need to be reviewed and reinvigorated so that they can be more effective in fostering co-operation and partnerships on a much wider range of issues between the Council, other public agencies, and CCHAs.
- 3.5. It is also vital for the Council and other partners to recognise that CCHAs are community-based organisations. This means that engagement at citywide level needs to be complemented by strong partnership structures at local levels.