

## Investing in Affordable Housing: a Consultation - Questionnaire

Please return by 17 March 2009 to: [AHIRPT@scotland.gsi.gov.uk](mailto:AHIRPT@scotland.gsi.gov.uk), or:

Affordable Housing Investment Reform Project Team  
Scottish Government  
1-H South  
Victoria Quay  
Edinburgh  
EH6 6QQ

### Questions:

#### **Question 1:**

To what extent does our assessment of the current economic situation reflect your assessment?

Similar, I think.

#### **Question 2:**

Does the economic situation strengthen or weaken the case for investment reform at this time, and why?

Strengthen because starting something new when things are in flux should lead 'up' the way.  
Weaken because tenant participation (TP) not at full capacity yet. Also your initiative is far too big - start smaller while economic crisis is still developing.

#### **Question 3:**

Do you agree that local authority Strategic Housing Investment Plans and related strategies should form the basis for identifying investment priorities for periods of up to five years?

Yes - Local Authorities (SHIP or other), should be at the heart of it all, underpinning all. But 5 year is far too short. We don't want short-term planning.

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### Question 4:

Do you agree with our proposed principles on which geographic regions for investment will be based?

No need for your principles because no need for regions. No need for more layers of bureaucracy. TP Regional Networks already in place. Scot. Gov. should show genuine desire to embrace Tenant Participation.

### Question 5:

- Do you agree with our proposed treatment for Orkney, Shetland and the Western Isles Councils?
- Do you agree with our proposed approach for Glasgow City and City of Edinburgh Councils?

### Question 6:

Do you agree that Councils, as the strategic planning and housing authorities, and in collaboration with RSLs, should advise on the regions to be adopted as the basis for Prospectuses?

NO NEW REGIONS!

Remark. Your questions are slanted towards what you think we should have!!

### Question 7:

- Do you agree the scope of the content proposed for Prospectuses set out in Table 2?
- How can we ensure that the housing need of people with specialist requirements or in more remote or rural areas are fully reflected in Prospectuses?

a) Yes - but include 2 more sub-titles: -  
Sustainability for climate change issues. etc.  
Environment for open spaces, clean air, green sites. etc.  
b) Use a Quality of Life indicator. Look at CIH paper called 'Person-Centred Approach'. (Housing health & social care) (Joint improvement team.)

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### Question 8:

a) Do you agree that there is a need to provide guidance within Prospectuses on maximum rent levels and is the proposed framework acceptable?

Rents must not be allowed to spiral out of control. If they do they won't be affordable. Capping is necessary. Also Housing Revenue Accounts should be completely ring-fenced in LAs & RSLs - protect our rent money. Bullet points 2 & 3 on page 17 are not understandable.

### Question 9:

a) Are there other issues which would similarly benefit from guidance?  
b) What are these and what is the case for including them?

Possibly guidance on how to prevent competition causing reduction in quality & standards. I think introducing competition will cause RSL's to despair. Providing housing isn't about competition, it never has been. Competition & quality/standards are not natural bed-fellows (not natural partners).

### Question 10:

a) Is the Lead Developer role proposed here sufficient to deliver a more streamlined and effective approach to investment in and procurement of new affordable housing?  
b) Does it adequately balance and recognise the needs and roles of non-developing RSL partners?

a) Not sure about this - Lead Developers could behave in an overbearing or all-powerful way - not good for social housing.  
b) Non-developing RSLs could feel squeezed out.

### Question 11:

What are your views on the routes we propose for establishing Lead Developers?

pages 18 & 19  
I think the routes are OK. But words <sup>in</sup> the Document ~~like~~ like "specialist role" & "guarantee" & "significant share of subsidy" will change their focus - the boards & committees -; could lead to power-mongering, & damaged relationships. This huge initiative could collapse because of conflict, to the detriment of people just wanting to have a home.

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### Question 12:

a) Do you agree with the proposed principles of consortia and responsibilities for consortium heads?

I agree with the proposed principles, but I think they are unworkable. The theory is OK. But there's too much opportunity for a few people at the heart of the theory to be pulling all the strings.

### Question 13:

- a) Do you agree with the proposals on formation of consortia, including the requirement of a formal agreement to govern relationships within consortia?  
b) What guidance would be helpful to support the sector in setting up consortia and Lead Developer arrangements?  
c) What guidance would be helpful to ensure tenant and community engagement in decision-making?

a) I agree in theory only.  
b) I don't know.  
c) Legal guidance - make it underwritten with everything else you are going to underwrite. Also,

### Question 14:

- a) Do you consider that there may be circumstances in which consortium membership should include local authorities or other non-RSL bodies?  
b) In what circumstances would you see this as appropriate?

a) Yes - consortium membership  
b) Where there isn't an RSL at present in area, but a non-RSL is present. Also LAs could be a guiding light re-tenant participation. This would help raise the bar on TP at LAs & RSLs & other groups.  
Special remit should be written for monitoring & evaluation. Lots of power for these officers.

### Question 15:

Are there circumstances in which bodies other than RSLs might be eligible to become heads of consortia and Lead Developers?

Local Authorities could where there are no other RSLs showing interest. Also Charities (eg King James VI Hospital in Perth). Also community owned enterprises, not for profit eg Cordale HA. Private developer/house builder may have some involvement, but should definitely not be heads of consortia or Lead Developers.

NB. Cordale Housing Assoc. is in Renton, West Dunbartonshire. Cordale Group is a company & a charity.

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**Question 16:**

Do you agree that a pre-qualification process should be included in the new arrangements?

Yes.

**Question 17:**

Are the pre-qualification criteria and information requirements set out at Annex C a reasonable basis on which to work with the Regulator, the SFHA and COSLA to refine the pre-qualification process?

Not experienced enough to say. But there should be a complete section on how the applicant is going to involve / consult with / listen to tenants, prospective owners & members of the public with a point to make.

**Question 18:**

Do you agree with the proposed funding criteria for bids for specific projects?

Not experienced enough to say

**Question 19:**

Do you agree with our proposed approach to development of an assessment framework?

Not experienced enough to say

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### Question 20:

How might we enhance the involvement of local authorities, RSLs and other stakeholders in the assessment of proposals?

Make sure they are included genuinely at every stage.

### Question 21:

Do you agree with our proposed approach to the appointment and management of Lead Developers?

Not sure

### Question 22:

a) Do you agree with the overall approach to grant agreements for Lead Developers as set out here?

b) What do you suggest we could alter to make grant payments more streamlined?

a) Not sure

b) I don't know

### Question 23:

Do you have any comments on the proposed timetable?

Yes, - it's impossible! - far too tight!

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### Question 24:

Which indicators and what aspects of the Investment Programme should be included in a monitoring and evaluation framework?

Tenant & owner input, & acceptance of their influence ~~with~~ on RSL's, LAs & Scot-Gov.  
Impact on Local Housing Strategies.  
Closure of Tenant Assoc. & RTO's.  
Acceptance by Scot-Gov. executives ~~are~~. What we

- Tenant volunteers - have said about these proposals.

L. Palmer.

