

# Scottish Social Housing Charter consultation



## Respondent's information form

Please make sure you return this form with your response so that we can handle your response properly.

### 1. Name/organisation

Name of organisation (if any)

Royal Town Planning Institute in Scotland

Title Mr  Ms  Mrs  Miss  Dr  Please tick as appropriate

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### 3. Permissions – I am responding as...

Individual

/ Group/organisation

Please tick as appropriate

- (a) Do you agree to your response being made available to the public (in the Scottish Government library or on the Scottish Government website or both)?

Please tick your choice  Yes  No

- (b) If yes, 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

or

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

or

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

- (c) The name and address of your organisation **will be** made available to the public (in the Scottish Government library or on the Scottish Government website or both).

Are you content for your **response** to be made available?

Please tick your choice  Yes  No

- (d) 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 need your permission to do so. Are you happy for the Scottish Government to contact you again in relation to this consultation exercise?

Please tick your choice

Yes

No

# Consultation questions

We listened to what you told us at the roadshow events, on our website, and in your responses to the discussion paper, and we think we have identified all the important areas that the Charter should cover.

1. Have we missed out any areas that the Charter should cover? If so, please tell us.

## Ministerial Foreword

1st bullet point

Standards should include coverage of

- space
- facilities
- house condition
- repair regime and
- climate change standards

4th bullet point

Public investment in new social housing should be targeted where the housing need is greatest: and where that need can be addressed most effectively.

## 1 Introduction and Background to the Charter

The Institute particularly strongly supports inclusion of the national outcome dealing with *well-designed, sustainable places*.

This section should include information about

- housing need
- the existing building/housing stock
- its condition and, specifically, its robustness in sustainability terms
- finance required for
  - repairs
  - climate change and access modifications
- conversion grants - especially for historic or listed buildings

Para 1.4 All social landlords should be not-for-profit organisations.

## 2 Scope of the Charter

While this is a Charter for Social Landlords, we believe that private sector landlords should be encouraged to follow its principles.

## 3 A Note about Language

Outcomes: suggested additional bullet point:

- the Charter will also point out how these admirable results can be achieved, and by whom.

#### 4 Developing the Charter

It is unfortunate that no representatives of the Institute, or indeed of the broader built environment professional groups, were involved in the Charter Sounding Board.

##### Stage 2: Discussion Paper

Para 4.18 There can be no good reason not to publish figures on expenditure, and since accounts will require to be kept it seems both practical and realistic to do so, even if access is restricted just to a website.

##### The Scottish Social Housing Charter

###### P14

The paragraphs of the Charter should be numbered for ease of reference. There should be clarity and differentiation between outcomes and standards. As well as outcomes and standards, advice on good practice guidance and positive practical examples should be available.

We appreciate that the Charter currently is aimed only at Social Landlords but, however, instead of stressing that the Charter *only* applies to Social Landlords, there should be a suggestion that private landlords should also be following the Charter's principles, as a matter of good practice. If they do not do this voluntarily, then there may well be arguments as to whether regulations be introduced to *ensure* that private sector tenants are not unduly disadvantaged.

Last sentence: "...they describe what a good ( ) landlord should be achieving for its tenants and other customers."

###### P15

It is not clear (2nd paragraph) how the Regulator will take action, nor what actions are possible.

3rd paragraph: The landlord should (also) publish annual reports on performance against the Charter. It should contain specific and measurable performance targets so that it will be obvious whether they are being met.

## The customer/landlord relationship

**We want the outcomes in this section to cover the important aspects of the customer/landlord relationship. We would like to know if you agree with the outcomes in the draft charter, and if the wording is clear and understandable.**

**2a. Do you agree with the 'participation' outcome?**

Yes  No

**If yes, please use the box to provide any comments. If no, please tell us why.**

First bullet point: This is much too vague. Tenants should be able to participate *and* influence.

Second bullet point: So is this: how **can** this be established? By survey?

Third bullet point: Tenants should have proper information on house conditions, accessibility and climate change fitness/suitability. And tenants should always have an active involvement in a plan to manage the houses.

**2b. Is the 'participation' outcome clear and understandable?**

Yes  No

**If no, please tell us why.**

See comments above at 2a.

**3a. Do you agree with the 'communication and customer services' outcome?**

Yes  No

**If yes, please use the box to provide any comments. If no, please tell us why.**

It is difficult to argue about any of these, except that they are really too general to be meaningful. Case studies or other examples would be particularly helpful here, in the interests of clarification.

To these bullet points should be added

"are satisfied that landlords address repairs timeously and effectively, in the context of a regularly monitored and reviewed planned programme of managed maintenance".

**3b. Is the 'communication and customer services' outcome clear and understandable?**

Yes  No

**If no, please tell us why.**

See comments above at 3a.

## **Quality of housing and the environment**

**We want the outcomes in this section to cover the important aspects of the quality of housing and the environment. We would like to know if you agree with the outcomes in the draft charter, and if the wording is clear and understandable.**

**4a. Do you agree with the 'housing quality' outcome?**

Yes  No

**If yes, please use the box to provide any comments. If no, please tell us why.**

The SHQS should also address the House in its setting: or additional bullet points should be introduced here to do so, looking at sustainable community, high quality environment, and attractive place.

The time for consultation on high energy efficiency standards for (all) housing is **NOW**, and provision should be made for improved access and user suitability at the same time.

**4b. Is the 'housing quality' outcome clear and understandable?**

Yes  No

**If no, please tell us why.**

See comments above at 4a.

**5a. Do you agree with the 'repairs, maintenance and improvements' outcome?**

Yes  No

**If yes, please use the box to provide any comments. If no, please tell us why.**

First bullet point: Standards should be nationally agreed wherever possible. Each housing group should have a management plan for the future, incorporating the planned maintenance and upgrading of houses and their settings in 'area' or 'place'.

**5b. Is the 'repairs, maintenance and improvements' outcome clear and understandable?**

Yes  No

**If no, please tell us why.**

See comments above at 5a.

**6a. Do you agree with the 'estate management' outcome?**

Yes  No

**If yes, please use the box to provide any comments. If no, please tell us why.**

Second bullet point: maintenance, cleanliness, safety, access and sustainability, and the broader community/neighbourhood within which they live.

Fourth bullet point: tenant participation should also extend to any further development proposals or other planned changes.

There should be a Management Plan (for the estate/tenanted properties in the area) in which quality of 'place' is an important factor.

Consideration should be given to the layout and setting of housing in the context of the European Landscape Convention.

There should be an encouragement to consider the future of the area in question in the context of the Planning Authority's Local Development Plan.

**6b. Is the 'estate management' outcome clear and understandable?**

Yes  No

**If no, please tell us why.**

See comments above at 6a.

## **Access to housing and support**

**We want the outcomes in this section to cover the important aspects of access to housing and support. We would like to know if you agree with the outcomes in the draft charter, and if the wording is clear and understandable.**

**7a. Do you agree with the 'housing options' outcome?**

Yes  No

**If yes, please use the box to provide any comments. If no, please tell us why.**

Second bullet point: It is too vague to just say *'have a say'*. Tenants must be able to engage and have influence.

**7b. Is the 'housing options' outcome clear and understandable?**

Yes  No

**If no, please tell us why.**

See comments above at 7a.

**8a. Do you agree with the 'access to social housing' outcome?**

Yes  No

**If yes, please use the box to provide any comments. If no, please tell us why.**

Social housing should be fully integrated (tenure blind) into the rest of the 'place' or local neighbourhood.

Second bullet point: be written down, transparent, and available	The allocation policies should on paper and on the web.
Third bullet point:	Too similar to those above.
Fourth bullet point: mentioned here.	Local Authorities should be
Fifth bullet point: public engagement.	Policies should be subject to
Sixth bullet point	'the best use of' is too vague.

**8b. Is the 'access to social housing' outcome clear and understandable?**

Yes  No

**If no, please tell us why.**

See comments above at 8a.

**9a. Do you agree with the 'homeless people' outcome?**

Yes  No

**If yes, please use the box to provide any comments. If no, please tell us why.**

Their rights should be made clear.

First bullet point:  
from the local authority.

This information should come

Second bullet point:  
should be set out.

What **are** their rights? They

Fourth bullet point:  
fairly and with respect.

...treated **well, professionally,**

Fifth and sixth bullet point:  
second bullet.

Should be incorporated into

Seventh bullet point:  
Other RSLs? Charities? Churches? Clarification is required.

Which other agencies? LAs?

**9b. Is the 'homeless people' outcome clear and understandable?**

Yes  No

**If no, please tell us why.**

See comments above at 9a.

**10a. Do you agree with the 'tenancy sustainment' outcome?**

Yes  No

**If yes, please use the box to provide any comments. If no, please tell us why.**

There must be a better word than Sustainment.

First bullet point: Who will support? LAs? Other RSLs? Charities? Churches? all should be mentioned.

Second bullet point: From whom? Planning Aid for Scotland, 'Housing Aid', Shelter?

Third bullet point: Provision is required for reason of

- ease of access and
- climate change mitigation and adaptation

**10b. Is the 'tenancy sustainment' outcome clear and understandable?**

Yes  No

**If no, please tell us why.**

See comments above at 10a.

**11a. Do you agree with the 'anti-social behaviour, neighbour nuisance and tenancy disputes' outcome?**

Yes  No

**If yes, please use the box to provide any comments. If no, please tell us why.**

First and fifth bullet points: should be amalgamated.

Second bullet point: Clear information is required on Permitted Development rights, management of commonly-owned/shared spaces, their maintenance, and pets.

Third bullet point: 'quickly and effectively' requires clearer definition.

Fifth bullet point: What support, how actioned?

Seventh bullet point: There is a clear need here for a Management Plan with clear policies and procedures, also dealing with physical works to maintain the area and enhance its sense of place.

Eighth bullet point: In the context of an area Management Plan as at the 7th bullet point above.

**11b. Is the 'anti-social behaviour, neighbour nuisance and tenancy disputes' outcome clear and understandable?**

Yes  No

**If no, please tell us why.**

See comments above at 11a.

## **Getting good value from rents and service charges**

**We want the outcomes in this section to cover the important aspects of getting good value from rents and service charges. We would like to know if you agree with the outcomes in the draft charter, and if the wording is clear and understandable.**

**12a. Do you agree with the 'value for money' outcome?**

Yes  No

**If yes, please use the box to provide any comments. If no, please tell us why.**

There should be general transparency, aided by clear national housing standards, which should specifically require good quality buildings, places and settings, set within a 5-year plan for maintenance and access/climate

change improvements.

**12b. Is the 'value for money' outcome clear and understandable?**

Yes  No

**If no, please tell us why.**

See comments above at 12b.

**13a. Do you agree with the 'rents and service charges' outcome?**

Yes  No

**If yes, please use the box to provide any comments. If no, please tell us why.**

First bullet point:  
consideration' means.

It is not clear what 'into

Second bullet point:  
for 5-year management plan.

See comments above on need

Third bullet point:  
be set for vacancies and arrears: at the very least these should be  
established as national indicators.

National target figures should

Fourth bullet point:  
incorporated into the Second bullet point.

This point should be

Fifth bullet point:  
always be the principal determinants? It may be necessary to accept less  
rent if there is a poor match between house and tenant requirements.  
Limited accessibility and climate change adaptation may be adverse  
features which should also be taken into account.

Should size and features

**13b. Is the 'rents and service charges' outcome clear and understandable?**

Yes  No

**If no, please tell us why.**

See comments above at 13a.

**14a. Do you agree with the 'transparency' outcome?**

**If yes, please use the box to provide any comments. If no, please tell us why.**

Yes  No

Perhaps social landlords should all fall under the ambit of the Freedom of Information Act.

**14b. Is the 'transparency' outcome clear and understandable?**

Yes  No

**If no, please tell us why.**

See comments above at 14a.

## **Other customers**

**We want the outcomes in this section to cover the important aspects of other customers. We would like to know if you agree with the outcomes in the draft charter, and if the wording is clear and understandable.**

**15a. Do you agree with the 'services for Gypsies/Travellers' outcome?**

Yes  No

**If yes, please use the box to provide any comments. If no, please tell us why.**

National standards of provision, management and maintenance must be addressed by local planning and housing authorities, including in Local Development and Housing Plans, and delivered within fixed timescales as a matter of urgency. It is unacceptable for authorities to prevaricate on this subject.

**15b. Is the 'services for Gypsies/Travellers' outcome clear and understandable?**

Yes  No

**If no, please tell us why.**

See comments above at 15a.

**16a. Do you agree with the 'other customers' outcome?**

Yes  No

**If yes, please use the box to provide any comments. If no, please tell us why.**

There is an absence of information on the courses of action open to tenants if landlords fail to work to the Charter standards. Will Scottish Government, in the form of the Regulator, step in, and if so, how? If so, this should be made clear.

**16b. Is the 'other customers' outcome clear and understandable?**

Yes  No

**If no, please tell us why.**

See comments above at 16a.

## **In conclusion**

**17. Do you think that a good landlord should be able to achieve these outcomes?**

Yes  No

**Please explain your answer.**

No comment

**18. Do you wish to add anything that is not covered by the questions above?**

No comment