

Regional Housing Strategy Review Consultation February – April 2007

Response Form and Questionnaire

The Regional Housing Board is reviewing the Regional Housing Strategy and has produced a draft review for consultation. The consultation period runs from 5 February to 27 April 2007. We would very much like to hear your views on the issues which will influence how regional funding will be used during 2008-11.

Please answer the questions below. If you wish to make specific comments on the questions, we have provided boxes for this. Figures in brackets denote paragraphs in the consultation document. There is also a further section for additional general comments.

Section 1: About you

In what capacity are you responding to this questionnaire*

Local Authority - Sub Regional Partnership

Please provide your name and address. We cannot accept anonymous or confidential consultation responses or submissions.

Name* ***Partnership for Urban South Hampshire (PUSH)***

Organisation:

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Section 2: Overall allocation of funds

Q1: In selecting areas for investment in affordable housing, should the Regional Housing Board (para 5.3):

- ✓ **Focus on areas that deliver sustainable development by supporting the regional priorities in the South East Plan**

Any additional comments / reasons for choice:

PUSH support that investment should be in line with regional priorities in SE Plan and we are committed to deliver a high number of additional homes over the next 20 years.

Now that a number of growth points have been agreed in SE region we would wish to see funding prioritised on the established growth areas and growth points. The importance of the regeneration of the urban centres in PUSH should be recognised. PUSH also want to emphasise the importance of the existing private sector housing stock in the sub region and the amount of investment needed to ensure that the stock is fit for purpose.

There are concerns that if investment was based on the previous criteria this would create a perverse incentive in regard to the number of homeless households in temporary accommodation as it does not take into account the prevention of homelessness performance of Local Authorities.

Q2: Should the Regional Housing Board allocate funds based on (para 5.2):

- ✓ **The number of homes to be delivered**

Any additional comments / reasons for choice:

The PUSH sub region has identified the need for a large number of homes to be delivered.

Evidence of high levels of housing need will necessitate significant levels of funding to ensure a high percentage of affordable rented homes, particularly family houses are delivered.

PUSH would like to see a clear target set for the number of rented and LCHO properties for the Region and for sub regions.

Section 3: Funding for different types of project

Q3: How much affordable housing funding should the Regional Housing Board invest in large strategic sites (para 2.8.1, 5.7)?

- ✓ **10% (around £44m a year)**

There needs to be some guidance given by the RHB to define what constitutes a “Large Strategic Site” – could these be listed as an Appendix to the Strategy? PUSH also would welcome a long term financial commitment to large strategic sites which would cover a minimum of 5 years.

**Q4: The Regional Housing Board plans to spend 1% of its budget (around £5m a year) on providing and refurbishing Gypsy and Traveller sites (para 11.1 – 11.3).
Is this:**

✓ Too high

Although PUSH has undertaken a G & T survey it is felt that it will be too early for the implications of the survey to be considered as part of the LDF process. In addition PUSH considers that there are other competing priorities which should be considered for funding for example older people and investment in the Council Housing stock.

Q5: How much should the Regional Housing Board invest in improving the condition of private sector housing (para 12.1 – 12.5)?

✓ 5% (around £20m a year, the current level)

PUSH considers that the condition of the private rented sector should be a higher priority for the RHB. There are many areas of private sector decline in urban areas which require some targeted area renewal programmes. The pressures of an ageing population and the need to invest in the energy efficiency of the existing housing stock to tackle climate change also reinforce the importance of private sector housing conditions. In addition the RHB will need to consider the issues arising from the Disabled Facilities Grant Review. *PUSH want to put forward a proposal to the RHB to undertake a sub regional private sector housing partnership looking at how these issues can be addressed on a sub regional basis in partnership with the voluntary sector, utility companies and other stakeholders.*

Q6: What should be the criteria for funding to improve private sector homes (para 12.3 – 12.4)?

Comments:

High house prices mean that in some cases the market could enable some owners to improve their homes. However there are many asset rich and cash poor owners who would need help and advice to undertake repairs to their property. The criteria to be used should include the energy efficiency of the property and its Health and safety rating in accordance with the HHSRS.

Q7: Do you support the Regional Housing Board using funds for loans or equity release schemes as a way to improve the condition of private sector housing (para 12.5)?

✓ Yes

Q8: What should be the Regional Housing Board's minimum target for rural affordable housing in small settlements (para 4.10 and 15)?

- ✓ **360 homes per year (the current level)**

Although PUSH is an urban area there is recognition that the adjoining rural housing pressures do impact on the urban areas with increased commuting distances for rural workers have to move to cheaper urban properties and travel to their place of work. PUSH also recognises the need for more housing in the adjoining rural areas which can help to meet the housing demand arising in more urban areas.

Q9: The evidence base for the draft South East Plan suggests that 70% of new affordable housing should be social rented. A proportion of this is likely to be achieved without public subsidy. How many of the Regional Housing Board's affordable homes should be social rented accommodation (para 3.2, 16)?

- ✓ **70%**

PUSH consider that the lack of social rented housing in the sub region supports the highest level of rented housing being sought to meet the high level of need identified in our sub regional HMA. PUSH would question whether it is realistic to assume that social rented housing can be achieved without public subsidy.

Q10: To emphasise the need for large, family-sized affordable housing, should the Regional Housing Board adopt (para 16.3 – 16.6)?

- ✓ **Separate regional targets for social rented and shared ownership housing**

Any additional comments / reasons for recommending an alternative approach:

As part of our HMA the consultants identified the different types of housing required throughout the sub region. They highlighted the need in many parts of the sub region that there is a significant need to support larger family housing. The sub regional housing need was identified as follows:-

- **1 bed = 25%**
- **2 bed = 30%**
- **3+bed = 45%**

It should be left to each Local Authority to decide how best to meet locally identified housing needs in their area.

Q11: Should the Regional Housing Board fund low cost home ownership for 'essential' local workers (para 17)?

✓ No

PUSH consider that LCHO should be available to all local workers as it is difficult to define what are “essential” local workers. Support should be given to all local households who are unable to access open market housing.

Q12: If the Regional Housing Board decided to fund low cost home ownership for essential workers, what type of workers at what income levels should be eligible (para 17)?

Comments:

PUSH’s emphasis upon improving the economy of the sub region makes this a priority issue for us and we would want to work with the Board to consider these issues in more detail including facilitating social tenants to access work. Our HMA identified that PUSH needs to do further work looking at how to address the local income levels with house prices and LCHO options. *PUSH proposes to work with our Zone Agents (Homes in Hants), together with local employers, developers and housing associations to look in more detail at these issues and to consider the scope of extending Social HomeBuy to those authorities which still retain their housing stock. We would be willing to undertake such work in partnership with the RHB if funding was available.*

Section 4: Infrastructure and land

Q13: How important is infrastructure to support new affordable homes (para 14)?

✓ Very important

PUSH recognises the importance of infrastructure and considers that local issues should be addressed by the individual site viability of any particular scheme. This may result in a lower percentage of affordable housing being achieved as a result. The large infrastructure requirements for larger strategic sites will need to be considered by English Partnerships and Communities England in due course

Q14: Do you support the Regional Housing Board’s intention to use a proportion of its funds (approximately 2%), on a recyclable basis, towards creating a Regional Infrastructure Fund that will ensure infrastructure is delivered alongside development (para 14)?

✓ No

PUSH considers that the RHB's funding should be targeted at housing and not infrastructure. The Government's proposals to introduce a Planning Gain Supplement will help to influence this issue in the coming years.

Q15: Do you support the Regional Housing Board's aim to buy surplus public sector brownfield land for affordable housing developments (para 13)?

✓ No

PUSH considers that this should be addressed by developers and housing providers on a site by site basis using the viability model to determine site suitability. Larger sites should be dealt with by English Partnerships and the introduction of another agency such as BLAT will add further complexity to the existing range of possible partners. *PUSH has identified a priority to set up our own delivery vehicle in the coming years to deliver the scale of new housing and infrastructure in the sub region. PUSH would be keen to work in partnership with the RHB to develop a solution and best practice model.*

Section 5: Additional general comments

If you have any further comments, please add them below.

Additional comments:

- 1. We feel that there is insufficient weighting given in the Strategy to the needs of the existing Council Housing stock in PUSH. There are nearly 50,000 Council properties in the PUSH area, some of which are in need of major investment and regeneration. We propose that this should be recognised as a higher priority by the RHB.**
- 2. Where local authorities have identified that social stock is obsolete resources should be available for renewal and redevelopment.**
- 3. We also feel that the demographic trends of older people and the need to reconfigure obsolete sheltered housing stock should be recognised by setting up a specific "Older Persons Housing Fund" with a ring fenced capital budget. Some funding should be available for developing schemes that address these issues such as the provision of new Extra Care schemes.**
- 4. PUSH welcomes the RHB's emphasis upon design and would suggest that the RHB sponsor a design award to highlight good practice in the**

Region. This should be based around the “Building for Life” principles.

- 5. PUSH would welcome more recognition of Local Authority’s ability to fund affordable housing through the provision of Social Housing Grant. There should be clear incentives given to encourage Local Authorities to invest in more affordable housing with higher levels of match funding from the RHB.**
- 6. There is insufficient weighting given in the document to the importance of climate change and PUSH would welcome some stretching targets to achieve Level 4 and above of the Code for Sustainable Homes.**

When completed, please return to the Assembly (details below) by 27 April 2007.
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