



## Your details

Please complete the following details below. It is essential that we have a name and the name of any organisation if you are responding on their behalf. Contact details would be helpful if we need to follow up on any points.

Name:	Heather Macnaughton	
Organisation:	Castle Rock Edinvar Housing Association	
Email address:	Heather.macnaughton@castlerockedinvar.co.uk	
Phone number:	07918 742001	
Would you like us to keep your response confidential:	No	

## Consultation questions

Below you will find response boxes for each of our consultation questions. If possible, please base your response on answers to these questions.

Some questions may be somewhat irrelevant to your interests, in which case please feel free to answer as many or as few as you like. And please feel free to offer other comments if you think they are relevant to our remit. There is space at the end for you to do so.

You can skip to the section(s) that you wish to respond to through the links below:

1. [Wellbeing](#)
2. [Housing and investment](#)
3. [Housing and the economy](#)
4. [Housing and welfare policy](#)
5. [Housing and the environment](#)
6. [Housing and health and education](#)
7. [Housing and community regeneration](#)
8. [The Private Rented Sector \(PRS\)](#)

## Section 1: Our assessment of the importance of housing for wellbeing in Scotland

**Q.1.** Has our assessment of housing and wellbeing missed any important benefits and, if so, which benefits and what is the evidence for this?

There appears to be a lack of recognition of green space and the importance of getting outdoors whether in a rural or urban setting in the analysis to well being. Lack of Vitamin D is on the increase both for younger and older generations which can lead to health problems. During this period of austerity this seems to be one of the first things to suffer.

Feeling secure is one of the key requirements for housing, especially for older people. Involving people to design for community safety is essential. You only seem to have mentioned statutory agencies.

No mention of the impact of anti social behaviour and this is a big area for whether you feel positive about your home or not.

**Q.2.** Has our assessment exaggerated any of the benefits of housing for wellbeing and, if so, in what respects and what are your reasons for saying this?

I would try and rank the importance of each benefit as some carry much more weight than others. The really big issues for housing just now are affordability both for a new home and to maintain the one you may already have, supply,

The education issue is less about the home and more about the quality of the school. Where your house is located seems to play a bigger factor in people's minds than the size of their house although a peaceful place to study is important.

## Section 2: Does Scotland invest enough in housing?

**Q.3.** Do you agree with our assessment of the current position on investment in housing?

Yes. As a nation we need to invest more in maintaining and improving our current housing stock as well as investing in the production of more housing.



**Q.4.** Do you agree with our brief assessment of current policy on investment in housing?

Partially. Most new housing production will be through private sector investment. The policy context which includes planning is not mentioned.

**Q.5.** Do you agree with our suggestions for further action in the area of investment in housing?

Partially. There is no mention of Energy Efficient Standards in Social Housing and if standards are to be extended beyond social housing then there needs to be a financial regime and regulatory process to support this.

**Q.**

**6.** Do you have any other suggestions that we have not mentioned in relation to investment in housing?

Housing in Scotland is a system in which all tenures have a role to play in increasing supply and supporting economic growth. There is no evidence to support 'common' platforms' for raising finance.

The role of institutional investors as well as government needs to be considered as well as actually defining the role that social housing is expected to play in society. If the argument is to increase supply in a highly subsidised sector, there needs to be clarity on the role that tenure is to play in a housing system and the price that should be charged for it.

### **Section 3: Getting a better fit between housing and the economy**

**Q.7.** Do you agree with our assessment of the current position regarding housing and the economy? What more would you add?

Partially. There is too much emphasis on home ownership being seen as the position which will provide wellbeing. Affordable private renting through an ethical landlord may be just as attractive particularly if life time tenancies or at least long term tenancies can be secured as currently exists in social housing.



**Q.8.** Do you agree with our assessment of the current situation of UK Government policy with regards to the housing market and the economy?

Partially. There seems to be an over emphasis on the UK when Housing, Wellbeing and the Economy are within the gift of the Scottish Government.

**Q.9.** What are your views about the five areas of policy reforms suggested here?

An attempt to smooth the tax when a house is purchased is supported.

Any attempt to change Council Tax needs to take cognisance that values vary enormously across the country.

Whilst Help to Buy supported house building it did nothing to address rising house prices and may result in the Scottish Government carrying a significant liability in the future for their share if the house prices drop. Any intervention must be balanced and work for all.

#### **Section 4: Getting a better fit between housing and welfare policy**

**Q.10.** Do you agree with our assessment of the current position regarding housing and welfare benefits? What more would you add?

Partially. There seems to be no cognisance of the role of the local authorities discretionary housing payment system.

**Q.11.** Do you agree with our assessment of the current situation of government policy at UK levels and the possible outcomes post-referendum? What more would you add?



If they can the Scottish Government will remove the spare room subsidy – whether they can do this and want to do this for all tenures is an interesting debate.

Whilst we understand the debate about personal responsibility and paying the tenant housing benefit and not the landlord we firmly believe that payment direct to the landlord is the most efficient and effective way of ensuring tenancy sustainment and stability in the sector to ensure confidence for continued investment.

**Q.12.** What are your views about the medium term policy options presented here? What other ideas and issues strike you over this time frame?

Supported. There should be some link between meeting housing standards and payment of housing benefit to ensure landlords who do not invest in their stock and who impact as a result on the health and wellbeing of the household do not profit from housing benefit payments.

**Q.13.** Do you agree that we have a unique opportunity to consider longer term policy options over the next key period in Scotland's history? How do you respond to the options proposed here? Are there other options that should be considered?

Agree the opportunity is there although the Smith Commission has probably not gone far enough to enable this.

There is a balance which needs to be struck between protecting the most vulnerable in society and managing housing expectations for those with short term financial difficulties. Redefining housing need assessment may be the starting point.

## Section 5: Getting a better fit between housing and the environment

**Q.14.** Do you agree with our assessment of the importance of housing to the environment?

No

The car is a reality and increasingly becoming less energy hungry. Your approach is driving a city agenda and will further isolate rural communities.

Communal living is a personal choice not a policy decision. The trend towards more singular living is likely to continue.

Housing, through micro renewables can be a contributor as well as a consumer.



# Commission on Housing & Wellbeing

**Q.15.** Do you agree with our brief assessment of current policy on housing in relation to the environment?

Partially - Seem to be light on the policy around Fuel Poverty and the impact of not being able to afford to heat a home. There is also new regulations around Smart Metering and the investment required in this to consider.

**Q.16.** Do you agree with our suggestions for further action in the area of housing and the environment?

No – not clear on the argument to reduce demolitions. Where is the evidence for this.

**Q.17.** Do you have other suggestions that we have not mentioned in relation to housing and the environment?

Regulating the energy efficiency measures sector for homes owners may need some consideration. The public are probably now exasperated with the number of nuisance calls pretending to be government incentives for home energy measures and the sector is in danger of no longer being credible.

## Section 6: Housing and Health and Education

**Q.18.** Do you agree with our on our assessment of the importance of housing to health and education?

Yes – although I would continue to stress that it is one of many factors and probably not the highest ranked. Social care would be important to include in this as a key heading and not just a bullet point.

**Q.19.** Do you agree with our brief assessment of current policy on housing and health and education?

Lacking any policy content on education. I think the Commission would be better to remove this as an element of focus.



**Q.20.** Do you agree with our suggestions for further action in the area of housing and health and education?

Partially but weighting needs to be given to these. The big issues here are around older people and supporting people in the community with long term conditions to live independently. Both of these require an effective social care system and housing available within communities with adequate facilities to cope and a welcoming neighbourhood to limit social isolation.

**Q.21.** Do you have other suggestions which we have not mentioned in relation to housing and health and education?

Older people should not be encouraged to “over downsize”. Two bedrooms enable carers/family members/friends to continue to visit and provide support in later years.

Age friendly design practices should be adopted in all homes.

Digital Inclusion should be consider as an aid and adaption in the home and eligible for financial support.

## Section 7: Housing and Community Regeneration

**Q.22.** Do you agree with our on our assessment of the importance of community regeneration?

Partially. Not much analysis around the rural and urban community agenda.

Much of the work that happens in communities is driven bottom up and supported by other external funders, for example the Big Lottery Fund. This is usually off radar to Community Planning Partnerships.

Community asset holding has had mixed success – is there real evidence out there of universal success across Scotland or it restricted to certain characteristics?

**Q.23.** Do you agree with our brief assessment of current policy on community regeneration?

Yes – more focus needed from the Scottish Government. It seems to have got lost.

Community Planning Partnerships are very mixed. There are still a lack of the right skills and vision within some local authorities to make this work effectively,



**Q.24.** Do you agree with our suggestions for further action in the area of community regeneration?

Partially.

We need to be clear that there are more examples out there of success than just GHA who after all have size and scale on their side.

I would sooner the Scottish Government promoted Community based regeneration per say than focus on asset ownership.

Recognition should be given to the fact that Housing Associations work across multiple local authority areas and any suggestions should not be so prescriptive as to limit the scope of their work across areas.

**Q.25.** Do you have other suggestions which we have not mentioned in relation to community regeneration?

There seems to be a gap in supporting the core costs of running community based assets. Money to buy them out has been made available but making them sustainable seems challenging to many. The most successful ones in our experience have a sport element.

The Development Trust Association has evolved well over the last few years and should continue to be supported.

## **Section 8: Do we need a more robust private rented sector?**

**Q.26.** Do you agree with our views on the need for a more effective private rented sector which can make a greater contribution to meeting housing needs?

Yes. There needs to be greater professionalization of the sector and encouragement to move away from the 'buy to let' model to give security over supply.

**Q.27.** Do you agree with our brief assessment of current policy on the private rented sector?





# Commission on Housing & Wellbeing

Partially. There is no mention of the tax regime or current Scottish Government consultation.

**Q.28.** Do you agree with our suggestions for further action in the private rented sector?

No. There is no evidence to substantiate the introduction of longer tenancies. This may act as a disincentive for both tenants and landlords.

There is a lack of understanding of the financial models required to 'develop' new market rented housing and the potential impact on parent RLSs.

**Q.29.** Do you have other suggestions which we have not mentioned in relation to the private rented sector?

Private rented sector will play an increasingly important role in the housing system and especially for younger people. Further consideration is needed for the role that PRS should play in a housing system and how this needs to be priced. RSL subsidiaries do have a role to play in entering the market through operational lease agreements. The key to attracting investors is land supply and certainty over returns. Local government needs to ensure PRS is integrated with Local Housing Strategies and Scottish Government rented guarantees through RSL subsidiaries would assist the sector develop.

**Do you have any further comments in relation to the Commission on Housing and Wellbeing's consultation paper?**

The Have and Have Not definition is not a good one. People have well being when they feel they have control over their life and their future. Housing is a basic requirement in this but housing ownership is not. In some cases you can be in more control renting as you do not become trapped than with a house in negative equity, in an area with no market or unable to afford the repairs.