



the housing
network
West Midlands Voluntary & Community Sector

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15.5.07

Dear Steve

Consultation response from the West Midlands Voluntary and Community Sector Network to the Midlands Regional Housing Allocations Strategy for 2008-2011

Thank you for the opportunity to comment on the draft Regional Housing Allocations Strategy (RAS).

We welcome the more strategic emphasis with the RAS centred on the implementation of the RHS 2005 and its core aims. A number of specific comments are outlined below:

Vulnerable People

We welcome the recognition in the strategy of the need to address the growing needs of vulnerable households, in urban and rural areas and the emerging consensus that meeting these needs is a key priority from a sub-regional perspective. However, we feel greater clarity is needed within the strategy (and in its future development) in relation to needs of vulnerable people and investment priorities within the HMAs / sub-regions. There is a need for clearer strategic guidance in terms of need and preferred provision and investment priorities. We would also like to see clearer linkage between Regional allocations and the National Hostels Capital Improvement Programmes.

We feel the RAS should indicate the proposed level of resources to be allocated for supported housing and the extent to which this help 'recover the position on new provision which had seen a strong decline in the recent years as a consequence of uncertainties regarding revenue funding under the supporting people regime'.

The WMVCSHN members could assist the HMAs in informing their analysis of need and strategic investment priorities for vulnerable people and would welcome the opportunity to become more involved in developing the Sub-regional/HMA investment strategies. For your information, details of the Lead Housing Network Members for each of the HMAs/sub-regions are included as appendix A.

Affordable Housing

We believe that it is important that the provision of affordable housing is seen as a high priority at strategic, operational and political levels. The RAS should be directed by the Regional Spatial Strategy targets, the findings of the sub-regional reports/ sub-regional housing strategies and the up-to-date local housing needs surveys undertaken by RHE.

We welcome the acknowledgement of the key role played by Rural Housing Enablers in delivering investment on the ground. We would like to see the appointment of RHE (mainstream funded) in each county across the region as a matter of priority. It is of particular concern that there is no DEFRA provision to continue funding the Worcestershire RHE post after 2007/2008.

We also welcome the acknowledgement that generally the need is more for social rented housing than shared ownership. We also support the emphasis on developing new approaches to delivery and new innovative products/ tenure options to meet intermediate housing needs. We agree that it is important that the public and private sector work together to develop creative ways to provide affordable housing. This should include a range of alternatives to shared-ownership (such as fixed equity schemes) as shared-ownership tends to an expensive option for the customer.

We are also keen to maximise on the use of supportive planning powers to provide affordable housing; we feel the RAS position on the use of planning powers could be strengthened.

The draft RAS states that 'on rural exception sites bidders must seek to minimise plot values'. We feel the RAS should go further and set a cap on the maximum that can be paid by bidders for plots on RES developments if their scheme is to be considered for an NAHP allocation.

We would hope that the RAS could reinforce the need for public sector landowners, and other landowners, to consider releasing land at less than market value for the development of affordable housing.

We would like to draw attention to the pressure faced by young people in both rural and urban communities in finding a housing pathway which facilitates their entry to work and does not trap them in benefit dependency.

We also feel the RAs could give more weight to funding innovative initiatives to tackle the under-occupation of affordable homes to release more family houses.

Future Research Programme and Engagement with Stakeholders

We welcome the commitment in the draft RAS to ensuring that as wide a variety of 'other stakeholders', including the voluntary and community sector, are given the opportunity to influence the development of the RAS.

The Housing Network acted as a key consultation conduit, for the development of the 2005 Regional Housing Strategy and a number of the associated strategies/research projects (for example, the Regional Homeless Strategy, the Regional Spatial Strategy and the Regional Supporting People Strategy).

The Network has over the past year held a number of consultation events with the voluntary and community sector network, and has commissioned research, which has helped inform regional and sub-regional and national strategy development. This in turn has helped in the development of appropriate investment responses.

The Network has worked closely with the former Regional Housing Partnership and Regional Housing Board, including representing the RHP at the RPG Public Enquiry. It continues to work closely with the new regional housing structures and is keen to develop stronger links with the HMA partnerships. The Housing Network also works closely with other regional networks and theme groups, including the Regional Homelessness Strategy Implementation Group, the BME Network, Rural Housing Network and the Supporting People Regional Implementation Group.

The Network, has secured limited funding from Lloyds TSB to enable it to continue to operate until March 2008 but now needs to secure funding for the longer-term in order to continue in its role of informing the development of regional and sub-regional strategies and ensuring the knowledge and experience of the sector, particularly in relation to some of the most vulnerable and 'hard to reach' groups is brought to the policy making arena.

We therefore feel it is vital that consideration is given in the RAS to identifying resources, possibly under the research budget head (consultative research), to enable the Network to continue and develop its role as a consultation conduit to the sector at both a regional and sub-regional/HMA level. We would welcome the opportunity to meet with you to discuss the role and future funding of the Housing Network.

Yours Sincerely

David Hider

Convenor

On behalf of the West Midlands Voluntary and Community Sector Network

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