

**Draft Response**

Social Housing Directions Consultation  
Department of Communities and Local Government  
Zone 1/A4  
Eland House  
Bressenden Place  
LONDON  
SW1E 5DU

Dear Sir/Madam

**IMPLEMENTING SOCIAL HOUSING REFORM; CONSULTATION ON DIRECTIONS TO THE SOCIAL HOUSING REGULATOR**

I am writing to give you West Lancashire Borough Council's comments on the Consultation Paper regarding Directions on Social Housing.

Overall the Council welcomes the reforms and feels that making local decisions with our residents offers a positive way forward.

At this stage the Council has some reservations about the Tenant Cashback scheme and hopes that this does not become a 'white elephant' like the Right to Repair scheme which is costly to administer and which is not used by Tenants. However, the Council notes that it will not be a prescriptive scheme and that local decisions can be made following examination of the pilot schemes.

I will now respond in more detail to the specific questions posed in the Consultation Paper.

**Q1. Does the draft direction on tenure set out the relevant factors that registered providers should consider when deciding what type of tenancy they should offer and issue?**

The Council is unclear from the Consultation Paper how Registered Providers will comply with the Tenancy Standard and take into account the published tenancy strategy produced by the Local Authority. The Council believes that if Local Housing Authorities are required to consult on the question of flexible tenure there should be clear timescales to allow the Council to undertake this function and then for Registered Providers to consider how they take the strategy into account. It will be difficult for Registered Providers who work in a number of Local Authorities to have a consistent approach. One wonders whether the tenancy strategy would be best left to each Registered Provider to undertake?

The development of flexible tenures which will pay particular attention to vulnerable tenants and their children will no doubt have an intrinsic link to the

development of universal credits and the ability of certain groups to be able to pay affordable rents. It may not be possible to fully explore the impact of the tenure strategy until all the information is accessible.

**Q2. Does the draft direction on tenure set out the right minimum requirements for a registered provider's tenancy policy?**

Yes. The direction on tenure is helpful and the further letter dated 28th July 2011 helps to clarify the position.

The tenancy policy needs to reflect that circumstances can and may change and in these eventualities the policy needs to be flexible in determining the best and most beneficial way forward.

**Q3. Does the draft direction set out the right minimum protections for tenants of registered providers?**

Yes. The direction makes the position clear.

**Q4. Do you agree with the principle and detail of our proposed direction on mutual exchange?**

The Council supports the opportunity for Tenants to participate in Mutual Exchange schemes. The Council favours a National Scheme rather than have a plethora of schemes. The cost of participation falls on the Registered Provider and the Council feels that for the service to have any real commitment and value a payment by each Tenant would add worth to the process.

**Q5. Do you agree with the principle and detail of our proposed revisions to the direction on tenant involvement and empowerment?**

The Council has already established mechanisms which will facilitate the direction on the tenant involvement and empowerment standard. The Council is comfortable that this is a positive way forward.

**Q6. What type of models for involving social tenants in repair and maintenance services are registered providers likely to offer, how many tenants might participate in these and what costs and benefits might they result in?**

The Council works closely with our Tenants to organise a responsible and cost efficient repairs and maintenance service. The financial benefits of this arrangement has enabled greater funds to be diverted to meeting the Decent Homes Standard which benefits Tenants generally. The Council has limited experience of allowing Tenants to undertake repairs or to commission this themselves. There are some reservations about how schemes of this nature would be 'policed'. The Council do not wish to see a repeat of the Right to Repair scheme which has not proved popular and has incurred cost for very limited benefits. The Council is prepared to explore the benefits of the Tenant Cashback pilots with Tenants to see if there is a desire to progress any particular changes. However, at this stage, without the full knowledge of the benefits of the Tenant Cashback pilots, the Council feels that the wording should be amended to reflect

exploration of this with the Tenant Panel or equivalent rather than a commitment to introduce the scheme at this stage.

**Q7. Do the proposed revisions to the rent direction adequately reflect the introduction of Affordable Rent**

Yes. These are clear and understandable.

**Q8. Do you agree with the proposed revisions to the Quality of Accommodation direction to reflect the expiry of the original target date for compliance?**

The Council plans within its self financing business plan to continue to maintain the Decent Homes Standard. The Council therefore do not have any comments to make on this specifically. However, the Council have on a number of occasions expressed concern about environment conditions within the neighbourhood standard. This is an area that needs to be explored between West Lancashire Borough Council and Government because the full range of asset management options may not be able to be explored fundamentally.

**Q9. Energy efficiency is implicit in the revisions to the Quality of Accommodation Direction; should we make it more explicit?**

The Council do not feel further clarification about Energy Efficiency is necessary within the Quality of Accommodation Direction.