



## The Wise Group Response to Firm Foundations - the Future of Housing in Scotland

### Background

The Wise Group is one of Scotland's leading social enterprises, working to help unemployed people into work, to promote sustainable lifestyle choices and to regenerate some of our most disadvantaged communities.

Since 1983 the Wise Group has played an active role in the social housing sector, delivering a range of services including energy efficiency advice and provision, home safety and security services and environmental and green space improvement.

We work with a range of Registered Social Landlords (RSLs) to provide regeneration services and to support them in their delivery of wider role activities. We operate in close partnership with many social housing providers to ensure that they maximise training and employment opportunities for their unemployed residents.

The Wise Group strongly welcomes the opportunity to comment on the *Firm Foundations* discussion paper and recognises the importance of this debate to meeting Scotland's future housing needs, particularly for the most disadvantaged and vulnerable residents. Our comments are restricted to those areas where we believe we have relevant or useful points to make, and do not therefore address all of the questions detailed in the discussion paper.



## Response to the Discussion Paper

### Part One - Employment, Employability and Social Inclusion

The decline of social housing as a tenure of choice and the growth in aspiration for owner occupation has resulted in the increasing stigmatisation of social housing. The concentration of unemployed and workless people in social housing means that it is important that landlords take a more holistic approach to their service delivery, operating in a way that promotes training, employment and other social inclusion opportunities for residents.

Whilst recognising that *Firm Foundations* is primarily focussed on physical regeneration rather than people there is reason to contest the assertion that the latter is only "the remit of community planning partnerships and regeneration outcome agreements". It is important that the potential impact of physical regeneration on people, either positive or negative is fully acknowledged and planned for at a strategic level, through documents such as this. The Wise Group would welcome a greater focus in the Scottish Government's plans for housing in Scotland on the added value that could be produced through its housing strategy, and highlights below some ways in which this could be achieved.

The proposal to increase house building in Scotland by 10,000 units per year, to a total of 35,000 units per year creates a number of challenges, particularly for the construction industry, where there is a current shortage of skilled trades people within the domestic construction sector.

The construction sector also faces a number of competing priorities, including the Glasgow Commonwealth Games, the London Olympics and the UK Government's aspiration to build proportionally as many additional houses in the rest of the UK. All of these factors create significant additional demand on an already stretched construction sector.

Social economy organisations like the Wise Group can play an important role in developing initiatives with RSL, local authority and private sector partners, to help provide construction training opportunities. These opportunities will help generate a new intake of skilled and semi-skilled construction workers, by offering training and employment opportunities to those currently excluded from the labour market, and will start to address some of the engrained social issues that are common to many social housing estates.

The Scottish Government is right to prioritise bringing empty properties in disrepair back to use as an essential element of a sustainable approach to housing. Activity to do so could also be linked to the wider social inclusion agenda, by providing opportunities for unemployed and homeless people, allowing them to gain skills and experience whilst working on homes that they could then occupy.

*Firm Foundations* challenges developers, builders and local authorities to increase the housing supply but it could and should go further than this by challenging them to do so in a way that maximises impact for the community. Social clauses that



encourage engagement with training and employment opportunities for local people should be considered.

Procurement is a powerful tool that can encourage social and environmental change. More could be achieved through Scotland's Housing Strategy if greater use were made of social clauses to encourage contractors to maximise training and employment opportunities for local people. Critical to this is the definition of best value: value for money is not just about the lowest cost; and minimum specifications for quality can be about more than quality of build; both can also be about gaining the maximum value from an investment.

*Firm Foundations* argues that there is mixed performance amongst social landlords in the standard of their delivery. It is important to acknowledge however that there are many instances where social landlords are playing a valuable role, not just in providing housing of a high standard but in providing wider services for their residents to improve their overall quality of life. The Wise Group has worked closely with organisations such as Clyde Valley Housing Association and Cunninghame Housing Association to ensure that their tenants benefit from physical regeneration activities by ensuring that these are associated with training and employment opportunities for the unemployed.

Currently 'Wider Role' forms an extremely small part of RSL activity, and of the overall Communities Scotland budget. Wider Role has never been at the heart of Communities Scotland's housing agenda; it has always been peripheral, an "add-on" and as a result Wider Role would not be considered seriously as a funding source for new build developments, other than for peripheral works. The review of Wider Role and the publication of *Firm Foundations* create the opportunity to put employability and training at the heart of the government's aspiration to regenerate communities.



## Part Two - Environmental Impact and Sustainability

The Wise Group welcomes the focus of *Firm Foundations* on the need for energy efficient housing and believes that significant strides can be made in reducing Scotland's carbon footprint through the use of intelligent, high quality planning and design in the housing sector.

The need to increase the quantity of Scotland's housing must be balanced with the need to provide high quality sustainable developments and the paper's emphasis on 'driving up environmental standards' is welcome. Given the ambitious scale of the government's new build plans it is vital that this is incorporated now, to avoid missing an important opportunity for change.

The Wise Group believes that there is a need for a comprehensive improvement in the standards of building regulations and that current standards are not at a level appropriate to ensure the levels of energy efficiency needed to have a meaningful impact on carbon omissions.

In the UK the domestic sector accounts for over 30% of all energy consumed - if all homes were efficiently insulated with effective heat controls and up to date appliances this could be reduced by up to a half. A house built to the current UK building regulations will use on average 65% more energy than a home built to Swedish regulations, demonstrating that there is immense potential for improved energy efficiency within British homes.

The Wise Group believes that the following actions should be taken:

- Building regulations should incorporate instructions for building developers on revised standards to encourage widespread use of passive solar and other energy saving features in building design.
- Building Regulations can promote energy efficiency by requiring considerations such as use of natural light; use of grouped building forms (to minimise external wall surface extent and exposure; the promotion of sustainable urban drainage systems (including rainwater and waste water collection and recycling) or the use of sustainable or recycled building materials.
- Planning regulations should be revised to make permissions conditional on the incorporation of energy efficient approaches.
- Existing boiler regulations in England should be extended to Scotland
- Legislation should be introduced that requires all domestic boilers over 15 years old to be replaced by A rated condensing combination boilers
- In Scotland loft insulation levels should be increased to 300mm, in particular increase the loft insulation specification in the Scottish Housing Quality Standard from 100mm to 300mm.
- Housing Associations that are involved in refurbishment and/or new build should be required to undertake a 25-year life-cycle comparison of renewable technologies such as biomass heating and heat pumps against gas, oil, LPG, and electricity, before placing contracts.

There are good examples of the way in which planning policy can be used innovatively to reduce the environmental impact of new housing. In Milton Keynes



for example the Council's planning policy calls for all new developments exceeding five domestic dwellings or those that incorporate over 1000 square metres of floor space to include the following:

- Energy efficiency by siting, design, layout and buildings' orientation to maximise sunlight and daylight, avoidance of overshadowing and passive ventilation systems.
- Grouped building forms in order to minimise external wall surface extent and exposure.
- Landscaping or planting design that optimises screening and improves individual building's thermal performance.
- Renewable energy technologies.
- Sustainable urban drainage systems including rainwater and wastewater collection and recycling.
- Significant use of building materials that are sustainable or recycled.
- Carbon neutrality or financial contributions to a carbon offset fund to enable carbon emissions to be offset elsewhere.

This example demonstrate the way in which planning policy can significantly reduce the environmental impact of new build and should be taken account of in further developing plans for growth in Scotland's housing sector.

### Contact

For further information on any of the points raised in this document please contact:

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We are responding as an organisation and are happy for our response to be made public in full.

We are happy for our response to be shared with other Scottish Government policy teams and to be contacted by them.