

## **Tenant Services Authority: Building a new regulatory framework**

Landscape Institute consultation response

September 2009

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### **Introduction**

The Landscape Institute (LI) is an educational charity and chartered body responsible for protecting, conserving and enhancing the natural and built environment for the benefit of the public. It champions well-designed and well-managed urban and rural landscape. The Institute's accreditation and professional procedures ensure that the designers, managers and scientists who make up the landscape architecture profession work to the highest standards. Its advocacy and education programmes promote the landscape architecture profession as one which focuses on design, environment and community in order to inspire great places where people want to live, work and visit.

The LI welcomes the opportunity to submit its views as part of the consultation on the development of a new regulatory framework. The LI hopes that the Tenant Services Authority (TSA) will find the input helpful at this early stage in designing the new framework and that, ultimately, our suggestions made here will assist in raising the service social tenants receive and their quality of life. The LI would be delighted to engage further with the TSA in order to help develop our ideas as set out below.

This response begins with general comments on the content of the discussion paper, followed by more detailed responses to specific areas of the consultation document.

### **General comments**

It is the understanding of the LI that social housing providers – registered social landlords and local authorities – own in excess of five million homes in the UK. Consequently, these organisations are also be responsible for significant areas of open space within and around their housing stock. It is these open spaces, and their quality, which represents the focus of the LI's response to the TSA consultation.

Open space is gaining more and more recognition in terms of the multiple socio-economic and environment benefits it can provide. Research has demonstrated that quality open space, whether 'natural' or otherwise can play a role in, for example:

- Reducing antisocial behaviour
- Discouraging crime
- Improving community relations
- Encouraging healthier lifestyles
- Adapting to climate change
- Mitigating further climate change
- Improving biodiversity
- Reducing flood risk
- Providing educational opportunities

The ability of open spaces to deliver such benefits is largely dependent on adequate investment in their planning, design, management and maintenance. However, it is our experience that the majority of open spaces owned and managed by social housing providers are in fact poorly planned, designed and managed to the extent that they often actually have the opposite effect to those benefits listed above. Moreover, this can have a detrimental impact upon both tenants and the wider community within the locality.

The LI believes that this is symptomatic of a lack of awareness of the important socio-economic and environmental roles that open spaces have to play in assisting social housing providers achieve their core business objectives. This is reinforced by an existing regulatory framework which does not adequately encourage or require social housing providers to invest in the open spaces for which they are responsible and which subsequently leads to a lack of investment in their planning, design, management and maintenance.

The LI believes that *Building and new regulatory framework* provides the ideal opportunity to raise the profile of open space within the social housing sector with a view to the development of mechanisms which will ensure that tenants and wider society reap the many benefits it has to offer. It is unclear at this stage what form a new regulatory framework should take in order to improve the quality of open space within the sector, however we would be happy to explore this further with the TSA.

#### **Specific comments: Foreword (page 1)**

The foreword of the TSA consultation document states that:

*'Our guiding principle is that the tenants' experience should be of the same high quality, irrespective of who their landlord is'.*

It is relevant here to highlight exemplary work undertaken in the sector, in order to fully understand that quality open space does not need to be a luxury for just a handful of tenants. The work conducted by the Peabody Trust at its Abbey Orchard Estate in London has, for example, transformed the environmental quality of the area through a retrofitting process which saw landscape professionals engaging with residents throughout every development phase. Former car parking areas have been turned into play areas and meeting places which encourage tenants on the estate to interact with one another. Spaces have been designed to encourage natural surveillance, discouraging antisocial behaviour. Whilst we would not profess that investment in such spaces is a 'cure all', it is important to note that the Peabody Trust has recognised the importance of investing in these spaces as part of a more holistic approach to its many core objectives.

It is clear that tenants of Abbey Orchard have received a far higher quality service in this case compared with the vast majority of those who currently live in neighbourhoods of significantly poorer environmental quality. The LI therefore believes that any new regulatory framework currently being developed by the TSA must include within it some provisions which will raise the standard of investment in open space across the entire social housing sector. Such a framework must ensure that high quality environments and neighbourhoods are not luxuries which are solely reliant upon vision and individual champions within a single social housing provider; such has largely been the case at Abbey Orchard. The LI would be delighted to work more closely with the TSA to help develop such standards.

#### **Specific comments: Service delivery – priorities (page 8)**

This section states, as part of the National Conversation, that:

*'Safety and security also featured prominently throughout. Taken together, health and safety, security in the neighbourhood and tackling anti-social behaviour were the second, third and fourth issues for tenants from their landlord, and the need to tackle nuisance behaviour was also mentioned by many tenants. The TSA recognises that although the Decent Homes programme has significantly improved things inside people's homes, there is still more to be done to build decent neighbourhoods where all tenants feel safe and secure'.*

The LI commends the recognition by the TSA that 'decent neighbourhoods' are still far from mainstream within the social housing sector. If the TSA is to fully appreciate the concerns raised by tenants as part of the National Conversation it is important that it recognises the various ways in which issues such as health and anti-social behaviour can be tackled. The LI understands that tackling anti-social behaviour and other concerns about safety and security are key challenges for social housing providers, and ones which have seen increasing investment in recent years.

However, the LI would like to suggest increased investment in the quality and quantity of open space within and around housing stock in tackling these issues as a more holistic approach. A new regulatory framework encouraging such investment into, and management of, open space could assist with this. CABE Space, the government's advisor on urban design and public space has published several reports which explore the links between quality of open space and behaviour and perceptions of crime. *Decent parks. Decent behaviour?* (2005) argues that good maintenance of open space is critical if people are to feel safer and make best use of the benefits that such spaces have the potential to provide.

The Communities and Local Government publication *Green spaces, better places* (2006) states that:

*'Parks and green spaces are a popular resource which can make a valuable contribution to the attractiveness of a neighbourhood, to the health and wellbeing of local people and expand educational opportunities for children and adults alike. They are assets to the nation. Despite their popularity, there has been a worrying decline in the quality of far too many urban parks and green spaces and action is needed if they are to deliver their many benefits'.*

While both of these examples relate to open spaces and parks in general, the LI believes that the underlying principles are equally applicable to the social housing sector. What is different however is the context within which social housing operates. The TSA's revision of the social housing regulatory framework provides a real opportunity to introduce some form of guidance which will raise awareness of the importance that social housing providers should afford to open spaces for which they are responsible; and translate this awareness to action on the ground with benefits for all tenants.

#### **Specific comments: Statutory objectives (page 15)**

This section states that one of the TSA's ten statutory objectives is:

*'To encourage social housing providers to contribute to the environmental, social and economic wellbeing of the areas in which their housing is situated'.*

If the TSA is to meet this overarching objective, it is imperative that social housing providers are encouraged to consider and enhance all spaces for which they are responsible. The LI has recently published its latest position statement on the subject of green infrastructure. [Green infrastructure: connected and multifunctional landscapes](#) outlines the many ways in which natural elements within and between our cities, towns and villages have a critical role to play in delivering a range of environmental and socio-economic benefits. It is important that this agenda, which is gaining increasing traction in public planning policy, also becomes embedded in the social housing sector.

#### **Specific comments: Proposed scope of the new standards framework – neighbourhood and estate management (page 38)**

This section states that one of the new standards included in the new regulatory framework should relate to neighbourhood and estate management. The current wording of the standard suggests that this would largely relate to maintenance and cleaning of all communal areas. The LI strongly supports this however and realises its importance however we would recommend a more comprehensive standard which explores the quality of communal space, in terms of its planning, design and management, in the first instance. If such spaces are poorly planned and designed in the first instance, even the best cleaning and maintenance will not deliver the benefits which they have the potential to provide.

The LI is appreciative of the many demands placed upon social housing providers, particularly at a time of economic downturn. We are keen to stress that we recognise that investment in open space by social housing providers may seem like a luxury which the majority of organisations cannot afford. However, we strongly believe that there are many benefits which can be gained, many of which directly relate to some of the core activities of social housing providers and which can improve the quality of life for tenants. Admittedly, the nature of a regulatory framework which would enable such advances to be made is something that would need to be explored in more detail as there are a great many questions surrounding precisely how improvements in open space quality can, and should be, measured. It may be that such a subject matter is not appropriate form more traditional, formulaic monitoring such as performance indicators. Indeed, given the need to take account of local circumstances when planning, designing and managing open space it may be more appropriate to adopt an approach which is more guidance orientated, highlighting best practice and outlining how it has been achieved. It may be that the performance of social housing providers in this regard be measured by the satisfaction of its tenants. All of these must be explored further and the LI would be delighted to assist the TSA in doing so.

The LI would be extremely interested in further discussions with the TSA with a view to helping develop a regulatory framework which could embed the importance of open spaces in the social housing sector. To discuss this in more detail, or for any other queries, please contact:

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