

Stewardship and Responsibility: A policy framework for private housing in Scotland.

I refer to the above Report and would like to offer the following comments, which have been collated into themed areas reflected within the report. Further comments will be submitted from colleagues within Environmental Health service within Aberdeenshire Council, which will be submitted at a later date.

Response to HITF Recommendations

1. Tolerable Standard. Agree in principle to the extension of the tolerable standard to include thermal insulation and that the supply, distribution and use of electrical power must be adequate and safe in use. The most important aspect to this area is the provision of authoritative and detailed guidance on the operation and interpretation of the revised tolerable standard. It is essential that any established advisory group contain membership from local authorities both urban and rural. It is also essential that any guidance document is produced for consultation prior to implementation of the revised standard. Finally, there will be resource implications from this revised Tolerable Standard and the Scottish Executive must also take this into account.
2. Scottish Housing Quality Standard. Agree that a defined quality standard would be beneficial but care will have to be taken that the standard is not considered the maximum level of quality but should be minimum acceptable level of quality. Guidance on the interpretation of the standard would be useful to ensure consistency across all tenures and Scotland. It is essential that the needs of those with disabilities is considered and should be included within the Standard, especially towards the principle of Lifetime Homes.
3. Repairing Standard for Private Landlords. In principle agree with all recommendations although consideration should be given to the regulation of such and the resource requirements for this.
4. Single Survey. Agree in principle with recommendations in particular to carry out a pilot and take account of their experience and lessons learnt prior to being extended across Scotland.
5. Purchaser's Information Pack. Agree with recommendations but must ensure process is transparent to be credible.
6. Common Repair and Maintenance. Agree in principle with recommendations but there will be resource implications in regulating additional burdens, e.g. that Local Authorities have powers to require common building insurance. Local Authorities could encourage the establishment of owners' associations and have powers to provide modest grants. The resource implications for this area could prove high and this would have to be recognised by the Scottish Executive prior to implementation. The recommendation in relation to community mediation scheme seems reasonable but should be considered in conjunction with other areas of work in relation to this scheme e.g. anti social behaviour.

7. Strategic Planning. Agree that each LHS should include a plan for action in respect to properties within their areas not meeting BTS. Aberdeenshire Council has already identified this within their draft LHS and have included a strategic objective to meet this requirement. Again resource implications in relation to private sector grants will influence the timescales for delivering the plan. It is also the intention to include within the LHS, targets against which the Action Plan can be measured against. The LHS Guidance does require to be strengthened both in light of these recommendations but also to reflect the experience of the pilot authorities. Again agreement to the recommendation in relation to Scottish House Condition Survey and local house condition surveys. An element of which is included within the LHCS currently being carried out by Aberdeenshire Council.

8. Improvement, Repair and Adaptation of Houses. Agree with recommendations and support the establishment of an integrated scheme of assistance. Aberdeenshire have included similar proposals in relation to the recommendation for directing public resources to the achievement of housing standards within the LHS. Agree with the principle to provide at least current core services of Care and Repair to all disabled and older people. With all these recommendations there will be high resource requirements and the Scottish Executive will have to recognise this. Also agree with mandatory entitlement to grant aid for owner-occupiers be removed and replaced with a provision for mandatory assistance.

9. Strengthening rights of private tenants. All recommendations should enhance the rights of private tenants and are therefore supported.

10. Wider private rented issues. Agree with the recommendation in relation to recognising the role of the private rented sector and this has been recognised with Aberdeenshire's LHS.

11. With any changes to policy and practice serious consideration must be given to widespread publicity to ensure private landlords, tenants and key agencies are aware of all the changes and their implications. Most of the recommendations also have resource implications and the Scottish Executive should recognise this and make arrangements to meet these requirements prior to any decisions on the future direction of action on private housing in Scotland.

Yours sincerely

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ABERDEENSHIRE COUNCIL