

Stewardship and Responsibility : A Policy Framework for Private Housing in Scotland

The Highland Councils Response

The Highland Council welcomes this report on how conditions, standards and the overall quality of housing across the sector-owner occupation and private renting-can be approved. The Council is particularly supportive of the recommended role for local authorities and the modernisation of their powers.

In order to achieve the ambitious recommendations set out in this wide ranging report there are obviously significant resource implications for local authorities .The funding implications will have to be costed and funding sources identified . There will need to be adequate consultations on the specific recommendations to ensure that the recommendations can be achieved.

We have some concerns or queries on a small number of recommendations, these are as follows:

Recommendation 2

Authoritative guidance is required if there is going to a common approach to what is or is not below a Tolerable Standard. However, it is essential that any guidance allows a degree of flexibility in order that the Standard is not able to be used to undermine any local approach based on common sense. Perhaps the task of developing guidance could be given to the Local Authority Housing Grants Network.

Paragraph 89

Whilst the Council supports the principle of energy conservation as a component of any Housing Quality Standard , the use of a NHER score of 5 or better is impracticable in areas where there is no gas supply (e.g. most of the Highlands) or for older properties which are otherwise in good condition .

Recommendations 66-71

The Council fully supports these recommendations in relation to public intervention at a local level, particularly in relation to bringing all houses up to the minimum tolerable standard. However, additional funding will have to be identified if local authorities can significantly reduce the number of BTS properties within any given timescale.

Recommendation 68

The Highland Council considers that it should be local authorities not the Scottish Executive that set the areas targets for the reduction in the number of Below Tolerable Standard houses and other relevant targets based on local information on numbers of BTS properties and likely investment levels. The local authorities would agree these

targets with the Scottish executive and these would form part of the national targets included with the Local Housing Strategy.

Recommendation 76

The Council agrees that the improvement of BTS houses and adaptations for disabled people should be defined as national priorities. However this should not be framed in such a way which precludes the ability of Council's to target other priorities.

Recommendation 80

Any system which would result in offering loans to people for whom a normal commercial loan is not practicable would require to be carefully structured to ensure that the authority were not encouraging people to build up levels of debt which would endanger their security . It is not clear who this type of loan would assist.

Recommendation 81

With regard to subsidised loans, the Council has concerns that it would be unable to obtain better rates of interest than could be achieved on the commercial market, therefore we don't understand how we can realistically subsidise conventional loans by reducing interest payments unless through some form of grant mechanism

Recommendation 83

The Council fully supports the principle of flexible tenure as proposed , which would be of assistance in tackling a number of very difficult cases, and considers that local authorities are the most appropriate vehicle to give this assistance rather than through a national agency.

Recommendation 85

The establishment of a national framework could be assistance to local authorities provided that this is seen as delivery tool of the local housing strategy.

Recommendation 89

The raising of the 5 year rule to 10 years, which is welcomed, would be assistance in fragile rural areas, helping to protect council investment. It is possible that the freedom to impose additional conditions over the use of the houses within the 10 year period could be helpful, but apart from the condition pertaining to the requirement for use as sole or main residence it is not clear what other additional conditions would be useful.

Annex C- Recommendations 99

The Council fully supports the increase in powers to tackle BTS properties in a strategic and area wide manner. However we consider that the threshold of 50% set under recommendation 99 is too high. The level of concentration of properties in any given which fail the tolerable standard or are in condition of serious disrepair or disrepair which is likely to deteriorate rapidly , should be reduced to 30% in order to

allow Councils to declare Housing Renewal Areas to those areas which require direct intervention.

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