

# *Association of Local Authority Chief Housing Officers*

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Scottish Executive  
Development Division  
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Dear Sir/Madam

## **THE FIRST REPORT OF THE HOUSING IMPROVEMENT TASK FORCE**

Thank you for the opportunity to comment on the Task Forces initial report.

The Association of Local Authority Chief Housing Officers welcomes the comprehensive review of issues which require to be addressed undertaken by the Task Force.

The development of Local Housing Strategies is now well underway in Scotland (through the pilot projects) and it is already clear that a number of issues require to be addressed in relation to private sector housing.

Firstly it is critical that further research is carried out to measure the quality of privately owned housing. We would strongly urge the Executive to consider modifying the data collected in future National House Condition Surveys to address this issue and to establish baseline data, which can conform Local Housing Strategies.

It is also vital that all privately owned housing is included within the Local Housing Strategy however it must be recognised that much of the dramatic increase in owner occupation has arisen as a result of the Right to Buy. These owners have lower average incomes and are therefore less able to afford the costs associated with repairing and maintaining their homes. The high incidence of Right to Buy owners also has a dramatic impact on a Council's ability to invest in its own housing stock through the HRA Capital Programme and this is an area where additional resources and further statutory powers are required.

The need for additional resources for private sector housing must also be addressed. This is critical to ensure that areas do not degenerate and that a comprehensive approach can be taken in relation to estate based regeneration.

It is noted that the Scottish Executive plan to introduce Means Testing for Repairs and Improvement Grants later this year. We would urge the Executive to reconsider the timing of this change and would ask that the introduction of Means Testing is postponed until the work of the Task Force has been completed and other complimentary services are in place (e.g. equity share and low interest loans).

Specific comments are detailed below in relation to each section of the Task Forces Report.

### ***The Extent of Disrepair and Obsolescence in the Private Sector***

- As outlined above, further research is required on the condition of private sector housing in Scotland and consideration should be given to modifying the data collected in future National House Condition surveys to address this issue and to establish baseline data which can inform Local Housing Strategies.
- An Index of Housing Quality should be established as an aspirational standard against which the quality of Scotland's housing can be measured. The Tolerable Standard should also be reviewed as the baseline, minimum standard for housing in Scotland.

### ***Investment Patterns in Private Sector Housing***

- It is critical that more emphasis is placed on the need to repair and maintain property. This should be addressed in a number of ways. Surveys for property sales should include comment on previous repairs expenditure and on future estimated expenditure. New investment products should be introduced to encourage owners to save for repairs and tax incentives (VAT and income tax) should be considered to encourage investment in repairs and maintenance.
- Additional financial products are required to assist low income owners finance repairs and improvements to their homes. Guidance on the provision for Local Authorities to offer equity share and low interest loan arrangements in terms of the Housing Scotland Act 2001 would be welcomed in this respect.
- Measures are required to improve conditions in the Private Rented Sector. Further consideration should be given to the level of Housing Benefit paid for private rented accommodation and this should be more closely aligned to quality of service provided.

### ***Arrangements for the management of communal repairs and maintenance***

- This is a critical area in much need of reform. Whilst owners should be encouraged to invest in common repairs and improvements where they are unwilling to do this powers are required to compel owners to invest in their homes.
- The statutory powers currently available to Councils require to be reviewed to include the following :-
  - Power to serve statutory notice separated from duty to provide grant assistance
  - Review of timescales for implementing notices

- Scope for charging orders to be imposed or opted for without the need to go through the statutory notice process.
- Further consideration needs to be given to the establishment of a new area based tool which could be used to promote repairs and improvements.

***House Buying and Selling***

- Clear information should be available to prospective purchasers on the common obligations associated with a property as well as its likely ongoing Repairs and Maintenance costs.

One final point which Alacho would wish to emphasise is that there is now some evidence of owner occupied housing falling into serious decline with little or no prospect of the property being sold. This leads to private renting and abandonment which is a serious concern. The work of the Task Force needs to also address this type of problem where no level of improvement or upgrading will result in a property becoming marketable in the future.

I trust these comments will be taken on board in formulating the Stage 2 report.

Yours faithfully

**KENNY SIMPSON**  
Secretary  
Association of Local Authority Chief Housing Officers