

Unknown

From: Searle E (Ellen)
Sent: 25 January 2008 09:53
To: Smith B (Becky)
Cc: 'ChCook@aberdeencity.gov.uk'
Subject: FW: Response to Firm Foundations



Response firm
foundations.doc ...

Becky

Aberdeen City's response to FF attached.

Christine, many thanks for bringing this to our attention.

Ellen

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-----Original Message-----

From: Christine Cook [mailto:ChCook@aberdeencity.gov.uk]
Sent: 25 January 2008 09:35
To: Searle E (Ellen)
Cc: Graeme Stuart
Subject: Response to Firm Foundations

This email has been received from an external party and
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Ellen,

As discussed in our telephone conversation earlier today, I am unable to submit Aberdeen City Council's response via your web site on the consultation paper Firm Foundations: The Future of Housing in Scotland.

The respondent information form will be submitted separately.

If you have any queries regarding the attached, please contact:

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Firm Foundation: The Future of Housing in Scotland – Draft response to questions

Question 1: Do you agree that aiming to increase the rate of new housing supply in Scotland to at least 35,000 a year by the middle of the next decade is a sensible and realistic ambition, and that this will help set a necessary political context for acceleration in housing supply?

There are three elements to the question posed – whether the target is sensible, whether it is realistic and whether it will help change the political context.

Sensible – The justification for a target of 35,000 new homes a year is ill defined in terms of supply and demand issues in the consultation paper. The question to which “35,000” is the answer hasn’t been articulated in the consultation paper and this is a concern. Although population growth is a stated ambition of the Scottish Government (‘The Government Economic Strategy’ Nov 2007), its relationship to the 35,000 target is unclear, as is the issue of house price growth and the need for significant regeneration of existing communities where badly designed and inappropriate housing has contributed to concentrations of multiple deprivation. If a target is to be stated, greater clarity of purpose is required to justify it.

There are particular issues relating to setting a national target and then interpreting this at a local level. Different parts of Scotland will have different opportunities, different aspirations and different constraints, which need to be recognised and acknowledged.

Realistic – It is certainly questionable whether a 35,000 target is realistic given current conditions for a whole range of reasons from the provision of infrastructure to service the developments to the skilled workforce to build the homes. The stage in the economic / housing market cycle should be recognised as it is probably this which will present the biggest challenge to the attainment of any target to increase supply. However a figure of 35,000 may help to achieve the change the mindset needed to address the size of the problem we are experiencing, for this reason setting a target can be seen as a positive step. An implementation plan would be required at a national level to ensure that the target could be achieved and this will need to include consideration of the funding of infrastructure providers and a Scottish equivalent to the Community Infrastructure Levy being proposed by Westminster since the abandonment of the Planning Gain Supplement proposals.

Political Context – If a target is set, with clear justification against an objective, it would help to set the context for decision-making processes (political and otherwise) for the scale of new housing. However, it would be important to put such a target in a clear context, which recognised that this does not mean a x% increase across the board. The National Planning Framework may be an appropriate vehicle to unpack some of the spatial issues raised by any target, along with SPP3.

Consideration of a target for affordable housing completions is required. This should cover the range of delivery options from rent through to Low Cost Home Ownership. This in turn would inform the level of investment required from both Government and local authorities.

Question 2: Do you agree that, to give practical effect to the ambition, local authorities should co-operate regionally in setting realistic housing targets for housing market areas, and in enabling the delivery of these targets? If so, what arrangements should be put in place to

support and provide incentives for such co-operation between relevant local authorities?

Regional co-operation between local authorities is already the norm across a range of planning and housing issues so we welcome the recognition being given to the work we are already undertaking.

This question appears to evidence a lack of understanding of how the system works at the current time through structure plans. The changes to the planning system in Scotland being brought forward by the Planning etc (Scotland) Act 2006 will have an impact on this, particularly in those areas outside the four largest city regions. The strategic development plans covering Aberdeen, Dundee, Edinburgh and Glasgow will continue to have this regional focus. There may be merit in considering whether it is appropriate to require regional housing strategies to cover those areas identified as strategic development plan areas. Since Aberdeen City is within a strategic development plan area, we would not wish to comment on arrangements outside such areas.

Proposals for the development of Housing Market Partnerships along with guidance on the strategic assessment of housing need and markets are welcomed. Joint working is already a reality for local authorities but further development of guidance will help formalise this work. However individual authorities still have statutory duties placed on them around issues such as homelessness and planning to meet housing need, so we need to ensure that the development of new housing is spread across market areas and not concentrated in one local authority area as this may detrimentally affect the ability of other authorities to discharge their statutory duties.

The statement “[I]t is vital [that new housing is] delivered on the basis of much higher environmental and design standards than we have seen in the past” (p14) is welcomed. This mirrors one of the issues raised for the emerging structure plan in the North East. Scotland should not be allowed to lag behind England in this regard (with their Code for Sustainable Homes), not least because climatic factors mean that fuel poverty is a much more significant issue in Scotland and our higher aspirations for cutting CO₂ emissions. Local initiatives (as advocated in the draft statutory guidance on planning and sustainable development) are second best. National requirements through building standards are much more appropriate, enforceable, equitable and in keeping with the needs of business. Avoiding “unmanaged, unplanned growth and...the creation of housing estates which do not contribute to meeting our aim of sustainable mixed communities” (p13) is of vital importance.

Question 3: Is there a role for a specialist national function to provide expert support for local authorities in strategic planning for housing? What expertise do you think this function would require?

We would welcome a specialist national function where we could draw on their expertise.

While robust and credible assessments of the housing market are required, they will only provide one element of the picture. Planning should not be reduced to simply numbers and targets and there may well be justifiable reasons for departing from the conclusions of such a research project – either up or down. These will include local aspirations for the area. The provision of Scottish guidance on Strategic Housing Needs and Market Assessment is welcomed but the finalised guidance needs to be issued as a matter of urgency if local authorities are to undertake this assessments in time to inform the 2009 round of Local Housing Strategies.

There should be a statutory requirement on local authorities to carry out a Strategic Housing Needs and Market Assessment (SHNMA). This could be subject to approval by the Scottish Government, thereby avoiding delaying and expense at public local inquiries

Expert support for the preparation of SHNMA's will be vital if they are to be robust and credible assessments. It would be helpful if a central point could be established which contained much of the information required to produce these assessments rather than all local authorities having to search for and in some cases pay for the required information. There is clearly a role here for the Scottish Government to provide this after the abolition of Communities Scotland. Historically, significant sums of money and considerable staff time have been spent on assessment, which have been undermined at Public Inquiries. This situation must not be allowed to continue. This should probably be the limit of this national support function.

The planning system already has mechanisms in place to deal with situations where the supply of land fails to keep pace with identified requirements. To go beyond this would create serious problems and may have significant unintended consequences.

To create such an presumption (p17) would stand in opposition to the plan-led system enshrined in the 2006 Act and do exactly what the consultation paper elsewhere explicitly states it wants to avoid - unplanned and unmanaged growth (p13).

Question 4: Even when land has planning permission there are still blockages that prevent new housing being built. What additional arrangements would, or could, accelerate development on land with planning permissions to help ensure that future housing supply targets are met?

There is a need for investment in infrastructure to ensure that the present land available for housing is an effective land supply. There should be priority given to ensuring the basic utilities are provided for these development sites, this however may be more of a rural issue than an urban issue. From an urban perspective the main issue is the use of brownfield sites, which may have contamination issues which can take a significant time to make suitable for residential use.

We await the outcome and views of the Housing Task Force Review set up by the Government on this issue.

Question 5: We have proposed that much expanded or new, stand-alone settlements may be a valid solution. How should we best encourage the development of new, sustainable communities that are sympathetic to Scotland's landscape and environment?

A Scottish Sustainable Communities Initiative may have potential to focus attention on particular areas experiencing significant growth to ensure that that growth is co-ordinated, delivered and of the highest quality. An audit of new housing (possibly by A&DS) along the lines carried out in England also has potential to drive up standards. It is disappointing that no question is asked in relation to the use of surplus public sector land and the suggestion that there could be a role for central government in the acquisition and assembly of land for development. Early discussion of land held on the Government's estate and the potential for residential development would be welcomed. The review of other public sector surplus land is also required now if ambitious levels of new build are to be achieved.

In addition, funding to support growth is of fundamental importance - funding of community infrastructure and transport measures. Urgent action is required to capture significant sums of money from the uplift in value from the granting of planning permission for new development or the infrastructure deficit will only get worse and the public attitude to new development will not be positive.

The timeframes for the development of successful new settlements is considerable. They may also lead to further pressures leading to the depopulation of existing settlements.

Question 6: How should different types of assistance within LIFT be targeted?

The options for targeting should to a large extent be dependent on the pressures on the local market and availability of affordable housing and the local for sale market.

Targeting Open Market Homestake at existing Council tenants or Registered Social Landlord (RSL) tenants is appropriate, as this will then provide a vacancy for reletting to a waiting list applicant. This ensures two households have their housing need addressed. A pilot for Open Market Homestake will commence shortly in the city so it is too early to give a view. We do need flexibility to respond to interest from applicants and availability in the market place. Rigid targeting and quotas are likely to cause difficulty so we need a flexible local response to local conditions.

As new products are identified we need discussion on these and local consideration of their implementation set against the need for national guidelines and standards.

In a regeneration context these measures could ease pressure on social housing and enable mixed tenure development. A proportion of tenants in any given regeneration area could be assisted to realise aspirations to achieve home ownership within the new development, and thus reduce the potential for displacement.

Question 7: How could the Government stimulate more innovative mortgage and related products and services to assist people in purchasing their first home?

The Government needs to work with the Council of Mortgage Lenders and other financial organisations. There are a huge range of products currently available and perhaps we need to see a streamlining of products designed for first time purchasers. These products do need to be competitive and where a first time buyer is tied to a products through a shared equity or other scheme this has to be demonstrated as a competitive product. We are concerned that these types of schemes also have significant additional costs around maintenance and service charges which first time buyers do not always consider when considering their budget.

There are real concerns that many first time buyers may not be able to sustain their mortgages particularly with the current practice of mortgages based on up to five times people income is not sustainable.

In regeneration areas it may be possible to provide homes for sale at a reduced cost compared to the open market. This could be provided as part of the development of new mixed tenure housing on local authority land. This may be more cost effective for Government and prevent any artificial raising of house prices as a result of more traditional means of mortgage assistance.

Question 8: Should the Government provide direct cash grants to first-time buyers?

No. We would be concerned that this would ultimately only inflate the private market further and would not represent value for money if all first time buyers were to receive this grant regardless of need. We would also presume that it would not be available to tenants exercising the RTB who are technically first time buyers but who receive a significant discount when exercising this right. The introduction of the single survey paid for by the seller we believe will be a major benefit to first time buyers. Not only will they not have to potentially pay for multiple surveys but also they will receive good quality information on the property they are buying and the likely maintenance costs they will have to meet.

Question 9: How can the private house-building sector play a bigger role in providing, without public subsidy, increased provision of affordable starter homes?

The planning system should be much more directional (without being excessively prescriptive) in terms of the type and size of housing built. Evidence from Aberdeen and Aberdeenshire clearly shows the consequences of the private sector building to where profit is one of their key requirements. Planning permissions granted in 2005 for new housing of over 20 units shows no terraced housing and a very low level of semi-detached housing (most of which was Housing Association developments). As a consequence, private sector new-build in Aberdeen was almost exclusively flatted, while in Aberdeenshire it was almost exclusively detached houses.

Through Affordable Housing Policies local authorities are negotiating with private developers property for sale at a reduced price from market sale. This does not require public subsidy and therefore is not tied to the availability of Housing Association Grant (HAG) or other funding.

There is a role for Low Cost Home Ownership (LCHO) negotiated through these planning requirements where it can be demonstrated that the sale price is set at an affordable level. As the paper highlights the affordability of such schemes is critical and ultimately this may relate back to the purchase price the developer has paid for the land. It is unlikely that developers will provide this product outwith their requirements as negotiated as part of a section 75 agreement. As Affordable Housing policies become more rooted into Local Plans developers will be clear on the requirements and will factor this into their business plans when considering the purchase price they can pay for any development site. Over time this should make it more likely that the development industry can play a bigger role in providing "starter homes".

There is a role for the Scottish Government national research function along with local authorities to define these affordability levels for local market areas. This will also help the development industry plan for this housing.

Question 10: What issues do you consider should be taken into account when considering the increased use of private sector lets to house low-income and homeless households?

The Council recognises the essential role that the private rental sector plays in meeting housing need and the wide range of housing options it can offer.

That the private rented sector (PRS) has a role to play in achieving the 2012 target is in no doubt. The question is what that role might be. Currently, local authorities are able to use the PRS for temporary housing, but are unable to use it to discharge their duties under homelessness legislation.

Where the PRS is used for temporary accommodation, this inability to allow people to remain forces vulnerable people to move out of what may well be settled, stable, and successful accommodation.

It is understood that the Government is to undertake a consultation exercise in the near future into the possible relaxation of the rules relating to the PRS. We would welcome an early commencement to the consultation.

There is a shortage of affordable accommodation to rent in the public sector, so despite Councils having homelessness prevention strategies in place (and offering, where possible, temporary and permanent accommodation), many homeless people are at risk of living in insecure accommodation for long periods, or risking periods of repeat homelessness.

In some parts of Scotland, accommodation in the PRS is in better supply than social housing, although it should be noted that there is not an even distribution across the country. When PRS accommodation is used to accommodate vulnerable homeless people on a temporary basis, Housing Benefit meets the relatively high rents. However, if the tenant moves into low paid or temporary work, their Housing Benefit reduces drastically. This may leave them unable to pay their rent, and they will see little or no financial benefit from working (the perverse incentive). The root of this problem lies with current rules surrounding Housing Benefit tapers and the earnings disregard. Similarly, what is deemed a management charge and what is deemed rent is of no consequence to the tenant, but is very important under Housing Benefit Regulations. There might be scope to increase the affordability of PRS tenancies for a period if benefits were able to cover or contribute to the management costs.

Ultimately, it is important to note that many people would elect to remain in their PRS tenancies for long periods, or permanently, and their landlords would be happy for them to remain. However, because Councils are effectively unable to close these cases, they are forced to either jeopardise the tenants' future by moving them into public sector accommodation, or face public criticism because of the length of time taken to resolve homelessness.

Question 11: How should we ensure an appropriate balance between safeguarding tenants' rights and encouraging the private rented sector to achieve its full potential in Scotland's overall housing market?

The provision of privately rented property has seen significant growth over the last few years, but locally supply still falls short of demand resulting in a very buoyant private rented market leading to the highest rent levels in Scotland. Landlords are therefore sitting on a "golden egg" and therefore voluntary schemes of Accreditation, or similar, present little incentive. On the other hand, areas of Scotland with an over supply may see a reduction of private rental properties if over regulated.

The introduction of the Private Rented Housing Panel will potentially provide an arena for tenants to be able to see their rights enforced. The use of the panel will need to be closely monitored, as there is some concern that where tenants use the panel, unscrupulous landlords could terminate their tenancy legally at the next ish date.

Question 12: Do you think there is sufficient engagement between the public sector and private landlords? If not, what else should national and local government be doing?

The level of engagement has increased significantly over the last few years. The introduction of local landlord accreditation schemes and national landlord registration has given far more contact between local authorities and the private rented sector. More can be done to build on the work to encourage all private landlords to become more professional and understand the legal requirements which are placed on them. We have locally organised a number of training events, information seminars and issued newsletters to landlords all with the aim of ensuring the sector is better informed and managed. We need to continue with this work and further develop this relationship.

Information also needs to be targeted at tenants so they are aware of their rights and can be given assistance to ensure they are respected. Ultimately tenants can terminate their lease where a landlord is not maintaining a property effectively or is not providing an appropriate service. However this ability is greatly reduced in areas where there is either a lack of choice or as we have in Aberdeen a very high demand for property.

Question 13: What other options should we consider for increasing the supply of private rented housing for low income and homeless households?

Extend the use of lead tenancies to the private rented sector, however in the present market climate this may not be an option in Aberdeen.

Question 14: How could more private landlords be encouraged to let to tenants on benefits and homeless households?

The provision of services such as Rent Guarantee Schemes, support for homeless households can all play a part in giving a landlord comfort that if problems do arise with a tenancy that a tenant will receive support to overcome this.

The introduction of Local Housing Allowances may have a positive or negative impact depending on the level at which an allowance is set. Restrictions for single people less than 25 years, i.e. young individuals, who do not have a non-dependant living with them, see their entitlement set at the standard rate for a room in shared accommodation. This does not fit with the progressive homelessness legislation which Scotland has introduced and will continue to be a major difficulty for young single people.

Question 15: What other schemes or incentives might help us to recycle empty properties more effectively?

To a large extent in this area there are no longer many buildings where all the properties are empty. Schemes such as Lead Tenancies have been used in the past but not recently as the market pressure for housing has seen developers take the lead in renovating vacant buildings. What we now have are individual properties pepper potted across the city. Some of these properties appear in new build developments where it would appear they have been purchased as speculative investments. It is not clear what incentives such owners would require to consider letting the properties.

The Council has already reduced the Council Tax discount on long term vacant properties which provides an income to be used as a grant to RSLs for new affordable housing. The policy was also introduced to encourage owners to make better use of these properties.

Question 16: Do you agree that we should exempt new build social housing from the Right to Buy?

We welcome the opportunity to exempt new properties from the Right to Buy but don't believe that a blanket policy across Scotland is the way forward. Legislation should be enacted which allows local authorities to exempt the right to buy in their areas after consideration of the local housing market and local needs. The decision should lie with local authorities and not be the subject of Ministerial approval as is the case with Pressured Area Status. This Council has recently considered these issues as part of the application for Pressured Area Status and would seek to exempt new build from the right to buy. However there may be some areas where this blanket policy would not be appropriate.

Although this Council has been awarded pressured Area Status this only impact on some areas and on tenants who started their tenancy on or after 30th September 2002. Given the major shortage of affordable housing a more radical approach to tackling this issue would be to allow local authorities to exempt all new lets from the RTB.

Question 17: Do you agree that we should subsidise local authorities in areas of need to use their prudential borrowing capacity to build new council houses?

Yes. We welcome the recognition that local authorities have an important role to play in the provision and management of affordable housing. However providing funding to local authorities should not be provided for by reducing the funding for RSLs.

The decision by a local authority as to whether it can build may be a marginal one when an option appraisal is carried out. A relatively small amount of grant may actually make the difference in the viability for a local authority. However the local authority must be able to demonstrate that it has fully appraised the impact on the Housing Revenue Account, it's debt levels and Prudential Borrowing requirements. It may be that local authorities could contract with a lead RSL developer to ensure that expertise and bulk procurement efficiencies are accessed.

As with all providers of new affordable housing local authorities should be able to demonstrate good performance as a housing service provider prior to receiving any subsidy. Ideally local authorities should be treated the same as RSL's but this may be constrained by the PSBR and rules on public debt.

Question 18: Do you agree that we should introduce large-scale competitions for subsidy?

We believe that having competition for grant subsidy could lead to further economies of scale. However in introducing competition clear safeguards need to be put in place to ensure that quality and design are not sacrificed purely for financial savings. The use of different construction methods such as offsite construction could be part of this competition. There may well be merit in a lead developer taking responsibility for the procurement but the management transferring to other RSLs after completion. In these circumstances it would be crucial for the local authority and receiving landlord to be fully involved in specifying the size, type and specific requirements for the properties.

Question 19: If not, how would you ensure that public subsidy is used to build as many good quality RSL houses as possible?

This question is not consistent with 17 & 18 above in that it only refers to RSLs and not local authorities.

Question 20: Do you agree that we should subsidise the development of houses for mid-market rent?

Properties for mid market renting are part of a mixed tenure community so we should be ensuring that it is provided. The question as to whether it requires subsidy and if so at what level will no doubt vary by locality. However our biggest challenge at present has to be to increase the amount of new affordable rented housing. Limited financial resources need to be targeted to achieve this at present. If RSLs can currently provide this option without subsidy then there is a question as to why subsidy would be required. It is also an option that could be considered as part of a section 75 agreement particularly if grant funding is unlikely to be available for affordable rental property. Existing local authority tenants have expressed concern about the support for mid market rental and the further stigmatisation this could provide for local authority tenants.

Question 21: If so, should the subsidy be awarded as part of the competitive regime for awarding HAG that we are proposing?

Yes, the developments should still be able to demonstrate the same value for money.

Question 22: If not, how would you increase variety in social housing?

Question 23: Do you agree that we should encourage landlords to look at means of adjusting the mix of their stock in the interests of achieving more sustainable mixed communities?

Yes. Our ultimate aim is to develop mixed communities, which do not exhibit the difficulties which have been experienced on many large-scale housing schemes. As previously stated above, it is disappointing that the consultation document is almost completely silent on regeneration and the opportunities that the integrated community regeneration approach to housing provision can help to address other national and local challenges e.g. health inequality, educational attainment and economic development at the neighbourhood level. The focus on new housing does give an impression that existing communities which exhibits the characteristics the document suggest the Government wish to avoid are not receiving any priority. The massive sustainable changes required to these communities cannot be achieved by local authorities through the limited borrowing capacity, which the Housing Revenue Account may have and which has to be used to achieve the SHQS. New Government funding is needed to tackle these issues.

In trying to adjust the mix of existing stock it is right that landlords look at the long term sustainability of their stock and consider other options. Demolition may be one option but where the costs of demolition and the retention of the outstanding debt stay with local authorities there is very little room for manoeuvre. As the Community Ownership Programme is no longer an option for local authorities we need new policy and financial options urgently from Government to tackle the regeneration needs. Small scale remodelling or sale of existing stock may be appropriate but the need to rehouse tenants, deal with owners through the RTB make this whole area difficult financially and long term projects during which significant additional financial pressures are applied.

Question 24: Do you think that subsidies for development should be provided to bodies other than registered social landlords?

The evolution of RSL and developer consortium partly to ensure the benefits of bulk procurements and partly to ensure the development of mixed housing types and tenures will potentially lead over time to subsidies to non RSLs being appropriate. However we don't believe at this time that these relationships are sufficiently well developed for this step.

The position is rural parts of Scotland where a local estate can provide affordable housing with subsidy is one example where this may be a sensible arrangement as long as the necessary contractual and quality requirements for design, maintenance and housing management are in place and can be enforced.

Question 25: What sorts of protections should be offered to tenants in these circumstances?

Our experience has been that private housing developers do not want to be landlords. They have the experience, knowledge and ability to deliver new housing. The protection to tenants comes from the affordable element being transferred to a RSL or local authority to manage thereafter. If developers became landlords then we would expect tenants to enjoy the same rights as those provided by a Scottish Secure Tenancy.

Question 26: Do you think that the Scottish Government should vary Right to Buy discounts by (a) locality and/or (b) type of property?

We would welcome future variation on the levels of discount but, as in question 16 above, we believe that local authorities should be given the power to decide locally what levels of discounts should be set by locality or property type within a national framework of discounts. This obviously needs a change to the existing Scotland wide legislation but in doing so would allow local authorities to respond to the local housing situation.

Question 27: Do you agree that ALMOs can provide a satisfactory alternative to stock transfers?

We do not believe at this stage that ALMOs can provide a satisfactory alternative. However if the financial restrictions on ALMOs were loosened then they may well be an option for some authorities to pursue..

Stock transfer has been seen by many authorities as a means of accessing new finance, which is not currently available to local authorities because of the limitations of public sector borrowing. The description of ALMOs in the discussion document and the current position in England does not offer any opportunities for accessing new funding. It is suggested that local authorities undertake considerable effort to consider ALMOs, consult with tenants and if agreed set up the new organisations in the hope that one day the financial restrictions for ALMOs may be loosened. If there was certainty that the financial restrictions on ALMOs would be loosened then they may prove a more attractive option for some authorities.

Question 28: Do you think that additional help from Government to enable landlords to meet the SHQS should be linked to improvements in a landlord's performance?

Yes. This authority has had to take difficult decisions around rental increases and borrowing to ensure that we have a robust Standard Delivery Plan, which can meet the SHQS. Where any landlord cannot meet the SHQS they need to demonstrate they have tackled high management and

maintenance costs, implemented an appropriate rental policy and have an accepted long-term business plan for the future. Only then should financial assistance be an option. The landlord's performance financially and in delivering quality services should then be directly linked to the provision of any financial assistance.

Question 29: If so, what measures do you think would be beneficial? If not, why not?

See 28 above

Question 30: Do you agree that we need to find new ways of focussing on the quality of place/open space and greenspace within deprived neighbourhoods?

This Council's Programme "Vibrant, Dynamic & Forward Looking" includes a commitment to "Enhance the total environment in social housing areas" so we welcome the paper highlighting this issue.

We do need to find new ways of focussing on this issue but not just quality of place/open space and greenspace. The document is almost totally focussed on the provision of new housing and says very little about the need for and delivery of regeneration in our existing communities. This may give the message that these communities are not important whereas their regeneration is critical to the future success of our communities and the issues covered in this question.

This authority has undertaken major consultation with a number of priority communities and prepared masterplans, which aim to tackle the full range of issues including education, employment, housing and environment. This is the type of approach, which focuses on the delivery of solutions. We could achieve more if we had support from the Scottish Government.

Question 31: Do you have suggestions for approaches that are not resource intensive and that include stakeholders?

No, effective approaches do involve extensive consultation with stakeholders.

Question 32: Do you agree that the lead role (and recipient of any resources) to undertake this work should be open to a range of stakeholders?

The delivery of outcomes is the critical achievement. Any stakeholder who can achieve these outcomes within agreed cost and governance parameters should be considered.

Question 33: Do you agree with the features and principles we have set out here for a modernised regulation framework?

Yes. The document recognises the importance of the Crerar review to ensuring future regulation is proportionate. We would welcome the proposed separation of roles. Setting policy and standards being the role of Government with the regulator holding landlords to account on compliance against

these standards. We would also welcome the move to risk based inspection away from the current cyclical inspection regime.

Question 34: How would you like social housing regulation to be organised? (For example, should it be a separate organisation or part of a group of other regulators?)

We would envisage social housing regulation being part of a group of other regulators.