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From: McKeownA [McKeownA@angus.gov.uk]
Sent: 24 January 2008 17:13
To: Housing Consultation 2007
Subject: Angus Council - Firm Foundations Response

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has been swept for the presence of computer viruses.

Dear Becky

Please find attached Angus Council's response to Firm Foundations.

[Kindest Regards](#)

Alan McKeown

[Head of Housing](#)
[Neighbourhood Services](#)
[Angus Council](#)
[\(Tel. 01307 474779\)](#)

Angus Council

Response to Firm Foundations – The Future of Housing in Scotland - A Discussion Document

Introduction

Angus Council are pleased to respond to the Scottish Government's first major policy statement on housing. Angus, like many areas of Scotland, has a shortage of readily available affordable housing for rent and for purchase. The area has an acknowledged trend of rising housing prices (in Montrose, some of the fastest growing prices in Scotland), a growing trend in the need for affordable housing for all client groups and a shortage of available development land on which to build affordable housing.

We acknowledge that this discussion document has been published in the midst of an extremely tight spending review for Scotland and that there are a wide range of competing pressures on the Scottish Budget. We also acknowledge that the document has been published without the benefit of the conclusions of the Ministerial Housing Supply Task Force and as such some major pieces of the housing vision are yet to be put in place. Finally, we acknowledge that this Scottish Government is genuinely seeking to collect and reflect on the views of stakeholders in the development of this agenda and we wish to provide comment to participate in this agenda.

Our response will be in the following sections:

- Principles on which Angus Council has built its response
- General Observations
- Specific Observations by Chapter
- Response to the Questions

Our response has been informed by discussions with our tenants' movement and also by specific discussions with our elected members leading to this response being formally adopted by Angus Council.

Principles

1. That the tenants/prospective purchasers of publicly funded homes in Angus should expect the same, if not higher, design and build standards as those who own their own housing
2. That all socially rented or affordable homes built in Angus with the benefit of public subsidy should take all reasonable steps to ensure they minimise their carbon footprint
3. That all social rented or affordable homes built with the benefit of public subsidy should be built with integrated sprinkler systems
4. That Angus Council works through its SHIP (Strategic Housing Investment Plan) to maximise the number of affordable homes for rent and sale through a variety of suppliers with a focus on quality and sustainability rather than the number of outputs
5. That Angus Council puts tenants and prospective tenants at the heart of the decision making process
6. That Angus Council works through the procurement process to maximise the potential for local companies and local labour to benefit from money invested within the Angus economy

7. That Angus Council takes ownership of what and where affordable homes are built in its area of responsibility
8. That Angus Council acknowledges the need to work with neighbouring authorities where housing markets overlap
9. That the Angus Community Planning Partnership will agree plans and oversee implementation to secure future affordable housing

In general it is right that government sets out its policies and how they wish to see them delivered in conjunction with local partners. There has been much discussion across and within Scottish housing circles with much of this being led by the previous and current administrations. As a result this document represents an evolutionary approach to policy development. It is clear from the document that the arguments put forward by the various elements that make up the housing lobby are readily identifiable and for the housing lobby the basic building blocks that have been argued for are there in one form or another. In that regard, this discussion sets out a genuine attempt to be open and to reflect on the views of stakeholders.

What is also clear is that whether or not you agreed with all or parts of this document, this discussion piece represents a change of attitude from Central Government which sets out an initial view on housing and offers a level of direction and engagement that was previously talked about but not delivered. This discussion document sets out some major challenges for all stakeholders in the housing sector and a collective response that puts the needs of citizens and communities first and not the needs of individual professionals and organisations, is demanded to create the step change in delivery that is called for.

As noted above, given this is the beginning of a consultation process, we are please to take part in that debate and to offer our views on the basis that there will be numerous opportunities for further engagement with Scottish Ministers as the discussion document develops and as Scottish Housing Policy is amended.

We are also mindful of the Concordat agreed between Scottish Local Government via COSLA and Cabinet Secretary John Swinney and have borne many of its principles and objectives in mind whilst drafting this response.

General Observations

Within this section we have five main areas that we want to comment on:

- The Four Elements
- Democratic Erosion
- Lack of Detail
- Lack of Delivery Focus
- The Eleven Realisation Mechanisms

The Four Elements

The four elements are difficult to disagree with in principle and fit with the current focus on value for money, design standards and environmental and social standards. There are however a range of questions that must be asked.

The questions on supply centre around how will this be delivered, by whom and who will fund it? On the laudable issue of choice for those on lower incomes again what are Ministers views on how will this be developed, funded and sustained?

With regard to balanced and sustainable communities this cannot be achieved via a build agenda alone and must be developed and sustained by an agenda that departs from the previous administration's brand of social liberalisation which has, arguably, seen the rights of the individual now outweigh those of the wider community.

Our communities tell us that they want a balanced agenda of rights and responsibilities, which places the personal responsibility agenda at the heart of debate and allows the professionalism of housing staff to manage local communities; to create and sustain communities to be enhanced. It will be interesting to see whether or not there is a widespread call for a more interventionist approach to tackling problems such as anti-social behaviour and rent arrears and if so, what action the government will take to develop the balance that our communities tell us is currently missing.

One of the key issues that this paper fails to tackle is that of the substitution of repeat homeless presentations with repeat tenancies as created by the 2001 and 2003 Acts and the impending local housing allowance/housing benefit changes that may cut direct payment to landlords out of the equation and may undermine the scope of prudential borrowing.

As raised above, many communities and tenants groups are of the view that the 2001 Act has led to an imbalance between the rights of the individual and wider community rights meaning those in priority need can accrue significant rent arrears and damage to property and end up being rehoused. This leads to a high degree of frustration within communities and providers and a sense that poor behaviour is rewarded and not good behaviour. Both of these issues have and will have significant impact on the development and sustainability of balanced communities and this debate cannot be left un-discussed.

On the issue of the provision of value for money, this paper builds on the deliberations of the past but significantly accelerates the debate to the point where this Scottish Government is tackling the issue of value for money head on. Whilst the Members of Angus Council fully subscribe to the achievement of best value, they are concerned the big is beautiful (and value) model has the potential to undermine the local economy, smaller builders and associated services and would welcome some acknowledgement that local business and labour are at the heart of a sustainable economy and that it is not Ministers' intentions to cut the costs of development to the point where the wider economy is weakened because smaller business cannot participate in public contracts. Furthermore, in an attempt to control inflationary building costs, there is a danger that the industry shuns contracts where there is an element of public subsidy (and restricted prices), in favour of more lucrative contracts.

Democratic Erosion

Communities Scotland has long argued for the development/re-instatement of regional arrangements, not least because it justifies a local presence. This was the argument that spelt the death of the original discussions on the transfer of development funding some years back and it is disappointing to note that this seems to have won through once again. There are some bold statements within this document and the opportunity to properly end the role of this NDPB and Members feel that this should be fully grasped. It is our view that maintaining the regional presence that Communities Scotland has argued for is a weakness in the strategic approach and may undermine confidence in the strength of the concordat.

Local authorities across Scotland are already operating across boundaries to continue their leading role in the efficiency agenda. There is no doubt that these arrangements should extend into the housing world and it is hoped that the Government will support this by disbanding the regional network of Communities Scotland and transferring the responsibilities and resources to local government through the developing outcomes framework. If the Government do not take this logical step and provide local authorities with the full range of strategic powers and resources available to them and retain the regional network, they will be undermining local democracy and the move to agreed outcomes as enshrined in the Concordat. The members of Angus Council noted with disappointment the plans for the shake up of the Enterprise Network and fear a similar situation will result for Communities Scotland. We would welcome clarification from Ministers as to whether or not their long-term plan is full devolution to local government of Communities Scotland's resources and that the current statements are simply the first steps along that route.

Angus Council is participating in the Tayside Procurement Consortium as part of the efficient government agenda and Angus Council proposes that in due course, the commissioning and procurement of properties is treated in the same way as other commodities and that the Council, as the strategic body sets the commissioning template for that provision through a detailed design brief. The regional apparatus is already being set up for this reformed method of collaborative procurement; harnessing its potential would allow the resources currently directed at the local Communities Scotland office to be directed at the provision of affordable housing.

Lack of Detail

As noted above in the absence of the results of the Task Force leaves a number of areas open to speculation raising more questions than answers and therefore, the timing of the sequence of key events is unhelpful as the full picture of the Government's thinking is not yet known. We do however expect that this will be addressed during the development of any legislation and that there will be ample opportunity to tie things together as the intellectual and policy worlds develop.

Lack of Delivery Focus

Whilst the statement offers the potential for a radically different world of commissioning and procurement for affordable housing, there remains a void on the detail of delivery. The ending of the right to buy for newly built properties is an economic reality. The right to buy has been a very successful policy and has underpinned the growth in owner occupation in Scotland. The policy is also now one of the major funding sources for the delivery of the SHQS and anything other than this narrow change would have not have made economic sense at this time. However, the ending of the RTB for all existing tenancies would further restrict the number of social rented properties lost in the future.

The issue of local authorities building raises many questions in relation to land, financial resources and the capacity of the sector to raise the finances via prudential borrowing. The one big question not discussed is that of housing benefit. It must be pointed out that in the current political context and relationship between Holyrood and Westminster there is an issue of the level of rents that housing benefit will sustain, and whether or not the treasury will allow the increased rents that will be needed to sustain prudential borrowing to be funded by Housing Benefit. Given the statements about the spending review there is a real possibility that the treasury could become a barrier to the plans of this discussion paper.

This also raises the issue that is not discussed in this paper which is that of the variety of rent levels across Scotland's landlords. There is a concern that Scottish Ministers want to intervene in how rents are set and the levels of increase that are deemed to be acceptable, just as they have done with the Council Tax through the Concordat. Most local authorities and housing associations are on an RPI plus 1% business model to meet the SHQS and some views on Ministerial thinking would be helpful.

Specific Comments

The Eleven Realisation Mechanisms (Page 4/5 of Firm Foundations)

Some brief observations are offered below:

35,000 Homes A Year

This responds to the broad need for affordable housing and represents a win for the building industry as they will build most of the homes; but also represents a win for the housing lobby who have argued hard for an increase in the numbers of affordable houses.

However there is no commitment to rented housing and the lobby has now turned its attention to rented housing and is refocusing its agenda. Given the reality of the Spending Review it is clearly the case that the affordable rental market as delivered by HAs will need to radically alter its business model to be a winner in this agenda and this will lead to a dramatic shake up in the numbers of developing HAs in Scotland and may see new developers enter the market.

Operating at the regional level holds no fears for Angus Council but we do not believe there is a regional need for Communities Scotland and as outlined earlier we are participating in a procurement consortium that could easily and sensibly replace any form of regional government representation and be accountable through the outcome agreement model and through local democratic oversight and scrutiny.

Sustainable Communities Initiative

In principle we do not object to this but the detail and funding issues remain unanswered and the Task Force conclusions are awaited.

LIFT

Again we do not have any real objections to this but it may be better value to encourage the provision through LAs and Community Planning Partnerships rather than giving subsidies direct to individuals. It remains to be seen what is meant by sustaining ownership in the context of those in mortgage or rental difficulties but we accept that this is an area that both nationally and locally requires further discussion.

Private Rent Sector (PRS)

Agreed, but how will LAs be resourced to deliver this? No direct mention is made of using the PRS to discharge the statutory duty. This would provide substantial relief to LAs but would need careful negotiation with Private Landlords.

Improving Access for Homeless Applicants

Angus Council completely agree but we will need to see the detail and it seems likely that support will also be required to sustain tenancies and manage any problems that arise during the life of a tenancy. It is acknowledged that a small minority of homeless households are extremely vulnerable and challenging. This document fails to explore

options to address these needs and the long awaited guidance on Section 7 accommodation seems to have been overlooked.

Incentive to LAs

Angus Council believes that such assistance would always be welcomed. This model could offer the opportunity to achieve better outcomes and higher outputs in the short term provided the quality and open space agenda are not compromised by a numbers and density agenda.

Right to Buy (RTB)

This is agreed as economic sense for new build, but the positive as well as the negative impacts of RTB must be recognised including the significant financial contributions RTB receipts continue to make to the capital programmes of LAs and the journey towards achieving the SHQS. Removing the RTB for all new tenancies will protect some social rented housing, particularly important in rural areas where often the majority of Council housing has been lost through the RTB, but other sources of investment may be required to achieve the SHQS.

Choice and Supply

Agreed, but we will need to see the detail and would wish to see the professional management freedom to manage to create and sustain the communities sought. Local authorities must also be allowed to alter the balance of their stock to ensure communities remain balanced and attractive places to live.

Scottish Housing Quality Standard (SHQS)

Arms length management organisations would need to offer the potential for borrowing outside the Public Sector Borrowing Framework and would need some assurances on how rent levels were set. There is also some concern about the sustainability of ALMOs south of the border and it is likely that ALMOs would need some form of financial assistance to achieve their goals. Perhaps one of the uses of ALMOs could be used as off sheet agencies for purchasing and trading land. It is agreed that the Government should seek to monitor performance against the SHQS but this should be organised on a risk basis and a one size fits all model is not necessary.

Regulation

A very helpful suggestion and one that is already on the agenda.

Specific Comments

Introduction

It is acknowledged that the majority of people aspire to own their own home and that that trend is unlikely to reduce. As such we recognise that national policies should reflect the balance of aspirations and needs. Angus Council supports a mixed response to tackling the housing needs across Scotland but also recognises that as well as having an overarching strategy it is right that local authorities have their own strategic and tactical response ensuring that the needs within communities can be met especially as they may vary from community to community. We look forward to working with Ministers to ensure that any national model is capable of adaptation to local circumstances and in Angus's case, is based on our Strategic Housing Investment Plan and on the principles set out at the beginning of our response.

Specific Comments

Chapter One - Housing Supply

Boosting Supply

There are a number of questions thrown up in the absence of the Task Force Conclusions. Where is the supply of affordable land for housing for rent going to come from? How will the public sector be compensated for selling land for affordable housing which sells at below the market rate? In respect of the Council's general fund, how will the general fund be compensated for any potential loss of funding and how does this stand alongside the Government's desire to a freeze in Council Tax levels for 2008/09? With regard to land held on the education account, all education departments will be assuming full capital value for their assets and indeed most PPP/PFI business models will have been underpinned by the assumption of full capital receipt for the sale of assets. The Government will have to consider how to handle this centrally if public sector land is to provide the initial boost for house building.

One of the key questions that the Local Housing Strategy and strategic planners will have to wrestle with is the pressure to increase the densities of sites to handle the need for increased numbers and also to make developments financially viable. This will be a particular battle in relation to Registered Social Landlord (RSL) development if the Government are to push ahead and reduce subsidy levels to those seen in England. It is clear that Scottish Ministers will have to provide some view on whether or not density will be compromised. If a rural authority such as Angus is to ensure that there is sufficient affordable housing in more remote areas, the need may be for a development of around 4 units. Economies of scale are out of the question and any decrease in public subsidy will result in higher rents to meet the cost of additional borrowing. The cost of living in rural areas is already high, this will add to problems with affordability and it is difficult to see how this can contribute to the sustainability agenda.

Another significant concern is whether or not there is enough skilled labour to build the targets set out in this discussion document. This is particularly pressing given the recent success of both the London and Glasgow games bids and there is already evidence of difficulties in attracting contractors to carry out projects at current levels of public funding. This is a problem that will also be felt in day to day repair contracts and will require constant monitoring and investment in training programmes to ensure the local flow of the required skilled staff.

In connection with the supply of labour, there is some doubt whether the proposed level of building will actually see the affordability gap halted and declined. The economic argument may be unrealistic in a world where there is no shortage of construction work across a range of sectors, skilled labour is in short supply, land prices continue to rise, home ownership remains the most attractive form of tenure and smaller household formation shows no signs of declining and all at the same time as construction inflation runs at around 8%.

Angus Council stands four square behind the Government in their plans to ensure location and design are central to the sustainability of the houses themselves and the communities who reside within the physical environment. We believe that homes must meet the highest design standards, push the boundaries of home safety and ensure the minimum environmental impact.

That is why we have set out our design principles in our SHIP and also in this response. For the Members of Angus Council the numbers game comes a distant second to the quality, safety and sustainability agenda. We are aware that our stance has impacts and accordingly our SHIP sets out how we will support the building of houses of the right type in the right places including the introduction of domestic sprinkler systems in all homes built in Angus with the benefit of public subsidy from 2009 onwards and investigating the feasibility and practicability of retrospective fitting of sprinkler systems in our modernisation programme.

Angus Council alongside Tayside Fire and Rescue Service conducted a sprinkler system test in one of our properties earmarked for regeneration. It was clear to all those who attended and from television footage that sprinkler systems proved their worth in protecting people and properties and Angus Council's elected members unanimously endorse this drive for higher fire prevention standards and we call upon the government to support our lead and roll this agenda out across Scotland. It is abundantly clear that a little extra investment now will pay off in the long run.

On a similar vein it is crucial that the density of housing projects does not compromise the quality of life of residents. The build them high principle may be acceptable in some settings but in a predominantly rural area higher density settlements are not attractive and are not what our communities support.

In Angus we believe that developments should have appropriate green space provision and where appropriate safe play areas for children. We have been pursuing a clear green and open space policy that requires section 75 contributions from developers where they chose not to put in place adequate open space and/or facilities. We have noted that Communities Scotland and some housing associations have reacted strongly against this approach but further note that the new SPP11 supports the provision of open space. It is hoped that when Communities Scotland is assimilated within the main Government support network that such incongruous policy conflicts will be resolved.

With regard to Green Belt Land this is an area that is extremely sensitive and a debate on the current use and restriction on Green Belt land would not be unhelpful.

Angus Council agrees with the overarching principle of integration and this is something we are pursuing through our work on section 75 agreements and open space facilities. We do however recognise the need for different solutions across and within specific communities and would encourage the current flexibility to be retained.

Questions 1 & 2; See separate section

Higher Environmental Standards

Angus Council agree with the views of the discussion paper but are concerned about the potential additional costs at a time when spending on housing is due to decline before rising slightly at the end of the spending period. We have, in this response, previously highlighted the tensions between national planning guidance and its interpretation and the role of a current government agency in actively undermining this balance. Angus Council welcome the link to the environment and believe that some additional financial support to offer to those investing in to new technologies and those who use them would be helpful. Like the use of sprinkler systems it is hoped that the more use that is made of such technologies, the cheaper they will become.

Zero Carbon

Angus Council wholeheartedly support this approach. We are currently negotiating the purchase of a Police Station site with Tayside Police (who will move to a renovated shared service building with Angus Council to provide a 24 hour Police facility in Monifieth) to release this surplus site for a zero carbon design project. We will keep Ministers informed of our progress and are sure this grant free project will attract considerable attention.

Energy Performance Certificates

In principle there is nothing wrong with this idea. The format will need to be discussed and agreed and landlords will need to scale up their preparations and work to be able to deliver these certificates. It is likely that if Ministers want to ensure zero or low level rent rises additional monies will need to be injected into the system to cover any new burdens.

Homes for Life

Angus Council fully supports this approach. It has been pursued by Communities Scotland for some time but they have failed to make any significant inroads as the additional costs associated with such properties have not been prioritised over the need to keep their build numbers on target. We await Ministers views as to whether or not they support our view that in some cases less is more in the short-term to meet the long-term needs of our citizens and our communities.

Strengthening the Planning Framework

We welcome Ministers views in this area. In Angus we are already testing the reaction to a proactive approach that seeks to raise standards where public subsidy is involved. The Angus SHIP has, at its heart, the recognition that higher standards may mean lower numbers but a trade off with increased sustainability, attractiveness of homes and communities and reduction in anti-social behaviour, crime and fire related incidents thus achieving significant long-term added value.

Whilst we believe that Ministers have not gone far enough in their removal of Communities Scotland and its apparatus, we do hope that the assimilation into central Government will lead to consistent policy making and consistent support from those who are advising Ministers which in turn will free up the local strategic planning system to deliver a new relationship with Ministers based on the progressive relationship set out in the concordat.

Choice Based Lettings (CBLs)

Under the previous central administration CBLs were promoted then left unused as the need to meet the 2012 homelessness target took priority. The need to meet this target (which the current Government have backed) means that authorities like Angus are currently allocating well in excess of 65% of their allocations to homelessness clients. This means that CBLs are not likely to feature in the current set up. It is vital that we make more use of the section 5 referral programme and more realistic work to establish proper common housing registers and common allocation policies within areas. Angus is already in discussions with one major housing association to achieve this, but we are aware that there are those HAs operating within our boundary who are diametrically opposed to such a proposal.

Cross Boundary Working

As set out in our principles we acknowledge the need to work across boundaries and will do so when and if the need arises.

Strategic Planning Support

Angus Council believe that it would be better to invest in developing robust frameworks for housing need and supporting LAs rather than investing in the creation of a central function. It seems incongruous to announce the notional end of one Government agency and then canvass views on replacing it with another.

Question 3; See separate section

Accelerating Land Supply SPP3 and Unblocking Developments

Angus Council have no objections to what is proposed. We believe there should be a facilitating agenda rather than a directing agenda within the context of an outcomes framework. The picture will become clearer when the Task Force Reports and we trust that the Task Force and this Discussion Document will be merged into any new housing legislation. Until such times as the full picture is known we can only comment on the direction of travel and will want to comment more fully once more is known.

Strategic Capacity

Given the great emphasis that is being placed on the local efficiency agenda elected members and communities feel that additional money should not be spent on new letter heads, signs and business cards. Added value should come from the full devolution of powers and resources to local government and the development of a robust and fit for purpose strategic planning framework, and not the removal of responsibilities to the centre because people find it easier to get what they want that way. The agenda should be about the growth of the local democratic mandate with members scrutinising the overarching strategic plans and delivery, not the removal of this to some central body.

Question 4; See separate section

Housing in Rural Scotland

The document is relatively silent with regard to this issue but there is a real problem created by the loss of stock via the RTB which has left many small towns and villages with a lack of affordable housing for rent and a serious shortage of good quality affordable family accommodation. It is hoped that the Task Force will make headway with regard to this issue but in the meantime, and in the absence of any significant increase in funding, Angus Council will continue to maximise the opportunities via the Section 75 arrangements contained within the Council's Affordable Housing Policy.

New Settlements

No authority can afford to rule out the prospect of new settlements and it would certainly lead to interesting debates with colleagues in planning and with local communities. The broad criteria set out on page 18 are difficult to argue against, however the practicalities and details will ensure that the creation of new settlements will not provide a quick solution and given the spending review announcements any use of public subsidy will need a long lead in time. We await the conclusions of the Task Force with great interest and hope that they compliment Firm Foundations and work together to provide a complete package for any future Housing Bill.

Question 5; See separate section

Public Sector Land

There are many people in and around the housing lobby who believe that the easy solution is to make public land readily available for affordable housing or simply for housing. It is unfortunate that this document makes no mention of NHS, MOD or land held by the Enterprise Network. There is also the small matter of the receipt generated by any sale and the fact that, as already highlighted, most public sector agencies will, for prudent financial planning, need to assume full market value. The acquisition of land is never as simplistic as sale and purchase relationship. Angus Council do not believe that there is any need for a central land purchase function and believe that this is something that should be managed at the local level through the creation of something like a not for profit special purchase vehicle which could trade in land ensuring an ongoing supply of land for the building of housing and affordable housing. Angus Council would like to see a more corporate approach to the discussion on public land and not just a focus on local government.

Chapter Three

Assistance for First Time Buyers

First Time Buyers

Research in Angus based on average incomes and house prices highlights the difficulties those on average or below average incomes face in getting on the ladder of homeownership. It is clear that a balanced package of support for those wishing to own and rent is required, but given our experience it is doubtful that a grant of £2,000, whilst helpful, will really be enough to make significant impact.

In Angus we have tried to use the golden share approach (in shared ownership/low cost homeownership) in areas of acute pressure but are aware that some associations use Low Cost Home Ownership to generate profit to when selling on and then to build again or recycle the funding to refurbish other stock. Angus Council are concerned that this approach does not allow for the retention affordable units, particularly in areas where land supply is an issue and would welcome some clarification from the centre that LCHO units or shared equity schemes should be aiming towards long-term retention. We do however have sympathy for associations who find themselves with properties that have accrued significant capital growth making the repurchase or on sale uneconomical and will be working with associations to develop a realistic approach to this issue.

It would be helpful if there was an ability to influence the tax levels paid on properties and in particular to investigate if there is a way in which private developers can be encouraged to target not just the average income purchaser but as part of a package, attract those on lower than average incomes into suitable affordable properties for sale (or provide assistance to bridge the affordability gap). If this is not a suitable economic proposition then it may be necessary to develop new publicly funded not for profit vehicles who can fill the gap in the market. We await the pilot results with interest and would encourage a flexible approach to the use of the properties freed up by any movement generated and would recommend that the potential to create a domino effect of moves rather than one single move be promoted.

Questions 6, 7 & 8; See Separate Section

Single Survey

Angus Council would be concerned about the costs of any extension of this scheme, or its like, if or when it is extended to RTB properties however we do acknowledge the need to fully disclose a property's characteristics at the point of sale.

Expanding Affordable Houses to Buy

This section makes some sensible suggestions and we would be keen to work with Ministers to see how this could become part of the Section 75 arrangements and how this could be delivered within a more flexible approach to planning approval. We would wish to see this delivered against a set of design and quality principles/benchmarks agreed locally and might be prepared to invest modest sums to support such a scheme provided the local guidelines were met and those on waiting lists or seeking low cost home ownership options already, in socially rented houses, were targeted. We would welcome a discussion with Ministers as to whether or not they would be prepared to work with us to develop a pilot project that might see some public funds invested but returned at the point of on sale.

Questions 9; See Separate Section

Chapter Four

Private Rented Sector (PRS)

Private Rented Sector

Angus Council wish to endorse the direction of travel set out in this chapter. We are however concerned at the lack of resources available to support the full implementation of the 2006 Act, and given the pressure to have no Council Tax rises, there is limited prospect of resources coming from general funds to support this work. We are aware that some authorities are using their PSHG to resource this area of work and in the absence of any funding for this work may be forced to divert money to ensure we maximise the potential of the private rented sector to contribute to meeting housing need. In the meantime we will continue to work with the sector to drive up standards of property and management and control this via our registration and licensing scheme.

Angus Council would support the use of PRS accommodation as part of a coordinated package to meet the 2012 target. We are aware of a significant level of interest from landlords and a recent event attracted well in excess of 100 landlords interested in finding out more about the drive to increase standards and to see how they could get more involved in working in partnership with Angus Council.

Question 10; See Separate Section

Review of the PRS

We look forward to playing our part in the review and would be happy to assist the government through organising an event in Angus for landlords so they could contribute to the review process. We are keen to develop our strategic engagement with landlords but are also aware that landlords are interested in capital appreciation, rental income and successful management of their tenancies including having backing to deal with problem tenants swiftly. The creation of a stable and responsive platform that meets landlords business and investment needs is crucial and we will work with Ministers and our local landlords to play our part in the development of that framework. Ministers may wish to investigate the possibility of tax issues that could be used as incentives to private landlords however that may require detailed discussions with the UK treasury.

Questions 11 & 12; See Separate Section

Private Sector Leasing

In principle this idea is supported, the market is dominated by one player and some competition may be necessary to see a balance of players in the market. This may include the development of a registered not-for-profit organisation but again critical to this is the need for swift intervention should any problems occur including the consideration of not creating a revolving door of allocations based on the 2001 and 2003 Act that see bad behaviour rewarded with another tenancy. Angus Council would not be opposed to the discharging of the statutory homelessness duty through the private rented sector but care and consideration would need to be given to the type of tenancy provided and what would happen to those who were unable to sustain their tenancy.

Question 13; See Separate Section

Encouraging Landlord to Rent to tenants on Housing Benefit

In Angus's experience the rent deposit guarantee scheme has not been a success and we are considering withdrawing from it and investing the resources in other areas of PRS work. As indicated above the creation of a business framework matched by a swift management intervention programme will create the confidence from PRS landlords to target a wider client base. One of the attractions of the Edinburgh model is that the company take on that management role and the success of that in the eyes of landlords should not be underestimated. This is an area that the review of the PRS should look into.

Local Housing Allowance

This is a concern for many landlords and only through its wider roll out will the problems be explored in detail. It does represent a significant additional business risk for landlords and needs to be accounted for as part of the development of a stable business framework for the PRS.

Questions 14; See Separate Section

Bringing Empty Properties in Disrepair Back Into Use

Rural Home Ownership Grants (RHOG) and Lead Tenancies are at best minor players in the market but nonetheless valuable tactical tools which are at the disposal of Communities Scotland. The greater use of carrot and stick approaches should be investigated. There is more of a need for effective intervention mechanisms so that authorities can action any strategy on the use of empty homes or homes in disrepair. The last major initiative was around 10 years ago when resources were made available to support this type of work. It remains to be seen whether Ministers wish to invest resources to support schemes such as this or support authorities to roll out the Highland scheme. More details of the Highland scheme would however be welcomed.

Questions 15; See Separate Section

Chapter Five

Social Housing - More than Just an Aspiration

Angus Council are pleased to see the clarification of the role of social housing through this discussion paper. At times it has felt like there was an agenda to push local government out of the world of housing provision. Local government housing by and large provides an

affordable and good quality supply of rented accommodation and is often the best quality option for citizens to meet their housing needs.

Angus Council also welcome the underlying message in this chapter that social housing is operating in a changing and complex world. It is clear that since the introduction of the 2001 and 2003 Acts the type of clients who are receiving housing and housing support are now tending to require greater support and are associated with a need for more involved tenancy and estate management, it is therefore helpful to have these challenges acknowledged in this paper.

Variations in Performance

Angus Council is currently deep in the process of redesigning all its policies, procedures and practices and is working through, not only the results of the Community Scotland Inspection Action Plan, but is harnessing the outputs of our own internal quality and performance team to target improvement activity. This is done with the tenants' movement at the heart of the design and policy formulation process. We are content that our own internal quality systems, backed up by the current inspection regime, have equipped us with the insights and focus to drive our services forward through a continuous improvement model. The evolution of the Inspection process is also on target to take a more risk based approach and we acknowledge that the efforts to drive up standards, whilst at the same time reducing the burden of inspection, are starting to provide evidence of positive results.

Rising Costs

It is acknowledged that management and maintenance costs have been rising. There are obvious answers to this not least the significant burden of new legislation, the plethora of ring fenced initiatives and the significant burden of the early inspection process. On the physical side we are finding houses being returned or abandoned in worsening states of repair as people realise that if they have a priority need they are pretty much guaranteed a service regardless of the state of their property, behaviour or rent account. It is clear that a shift in attitude to dealing with these problems and sending a message of responsibility is now required and it is hoped that this Government will bring some balance to the rights and responsibilities agenda. Angus Council would support a drive to return to a core housing management function and streamline the number of new initiatives and we hope that any new legislation will strive to simplify the role of housing and de-clutter what has been a changing environment since the turn of the century.

Subsidy

The current development system has driven this and Housing Benefit has picked up the costs but for how long? The argument will be land prices and like our oil, this is a finite resource but unlike oil, we can't buy it in from abroad. The economic reality of growth and inflation will eventually redress any short term measures. We note that despite some discussion no mention is made of the variety of rent levels and rent rises across Scotland. This is currently under debate in of rents in England.

Chapter Six Stimulating Innovation and Choice in Social Housing

Supporting Local Authorities as Social Landlords

Angus Council welcome the Scottish Government's endorsement of the role of local authorities as contributors to the overall development of affordable housing for rent in

Scotland. Angus Council is in the process of developing a complementary development programme to add to the current development plans in the area rather than to replace them. The reality is that the amount of land available through the housing revenue account restricts our role to being a small added value new build provider. We are also committed to meeting and exceeding the SHQS in advance of the target date and then ensuring our stock is maintained to the higher Angus Standard whilst continuing to ensure that our rents remain among the lowest in Scotland. This means that we do not have significant additional resources readily available to invest in new build properties whilst at the same time retaining a prudent approach to managing our finances.

Right to Buy

The ending of the right to buy for new build properties is an economic necessity, especially where capital appreciation is not sufficient to negate the effects of the capped discount. In Angus we are now seeing the effects of the reformed right to buy increasingly reduce the number of properties we are selling each year and there is some debate as to whether or not new build properties could be afforded in the current economic and house price inflation climate. However this change to the RTB will provide the confidence needed for authorities and housing associations to build and should, in conjunction with assistance to local authorities to build provide the incentive for LAs to develop additional new build properties to meet local needs.

Angus Council also welcome the announcement of incentives for Councils to undertake new building and we await the details of these incentives with great interest. Given the borrowing regime for local government is different to that of Housing Associations, it is possible that smaller levels of capital incentives could be possible but could allow for significantly higher standards of build thus meeting the local and national sustainability agendas as well as creating a more equitable policy approach to meeting housing need.

Questions 16 & 17; See Separate Section

Improving the Supply of RSL Housing

The efficiency agenda has, since its inception, mainly focussed on the public sector and especially in and around local government, the NHS and the Civil Service. Angus Council agree that the efficiency agenda should be rolled out across all agencies in receipt of public subsidy. There are existing examples of consortium/lead developer arrangements and the agenda has been pursued at various times by Communities Scotland but with only limited success. Within any new regional model, it is vital that the link to local democratic decision making is not removed in favour of a centralised agenda, as this is the very agenda that has led to the lack of transparency associated with the current Communities Scotland method of resource allocation.

It is vital that when the new arrangements are being developed that these are done in a manner that adds value to the current local housing strategy system and does not undermine it. Local authorities and other local housing partners must have a very strong presence in the design and management of any system and it is Angus Council's belief that this must form part of the outcome framework.

The final point we wish to make is that there must be a balance between the argument for reduced subsidy and stretching the budget available for new build affordable housing and the impacts on rents. Stretching the capital subsidy budget for new build housing (or its

replacement) must not be allowed to push rents past local affordability levels as this would undermine the Government's arguments within this discussion document.

Questions 18 & 19; See Separate Section

Freedom for New Models

It is clear that the need and desire for new models of housing tenure and socially minded providers is there in varying degrees across Scotland. It will be interesting to see how new mid market models would work outside larger urban areas, how these will be funded and how the Housing Benefit situation will impact on such models. Given the degree of levelling of the development playing field that this paper is presenting, the possibility of allowing local authorities to establish and/or support arms length companies should not be ruled out. Finally we would also wish to ensure there was a link to common housing registers where appropriate and are sure that Scottish Ministers will also be mindful of the need for this link.

Questions 20, 21, 22; See Separate Section

Improving Variety in Existing Stock

Angus Council would support the development of a framework for discussion and development but as noted above we would wish to see the possibility of local authorities entering this more entrepreneurial programme given that the right to buy has eroded the existing stock base, and in particular, removed from the rental pool our most attractive family housing.

Question 23; See Separate Section

Affordable Rent by non RSLs

Angus Council do not object in principle to making public subsidy available to non public sector agencies; however we would be mindful of the need to develop an appropriately transparent system through which this could be administered and the principles of the scheme protected for whatever time frame was agreed at the outset of the programme for the retention of houses for rent. It is possible that this approach could act as an incentive for land owners to participate in development schemes and open up a hitherto difficult to reach supply of land. Such schemes would require an understanding that there would be an element of return in any scheme for some of the participants and this has at times acted as a mental barrier in the minds of some decision makers and some housing organisations.

Questions 24 & 25; See Separate Section

Further Consideration of the RTB Scheme

The changes introduced as result of the 2001 Act are now having a significant impact on the level of RTB applications and purchases in Angus. Whilst this is a positive in that it reduces the loss of stock from the rental pool it is having a knock on impact on the level of receipts that are available for re-investment in the stock and if the picture in Angus is being replicated across Scotland this may have impacts on both the SHQS and any long-term development plans by local authorities. It is against this practical backdrop that any further amendments to the RTB need to be considered or indeed any need for additional investment should be considered.

Question 26; See Separate Section

Improving the Quality of Existing Housing

Angus Council agree that all Social Housing should be brought up to the SHQS as a minimum by 2015 and are investing over £9 million per annum to achieve and better this standards on or before 2015.

With regard to ALMOs there may be cases where these are helpful vehicles but as in England these will require subsidy support and the long-term life and value of ALMOs must be weighed up against the experience gained from across the border. We would also welcome clarification as to whether or not the treasury would write off debt in any circumstances.

Questions 27, 28, 29; See Separate Section

Better Neighbourhoods

Angus Council are very aware of the social and managerial environment as well as the physical environment. In Angus we already have a good approach to our existing areas of open space and are using existing six acre open space standard as our benchmark and have built this into our affordable housing policy and planning policies as appropriate. We are mindful of the cost of providing suitable open spaces and the costs of their maintenance, especially in times where public money is tight and there is pressure to keep rent and council tax rises to the minimum.

With regard to the managerial agenda, many in our communities believe that housing providers should be given the tools and support (especially at the Sherriff Court) to take fast and decisive action to root out problems and once these have been resolved prevent them from recurring. Again many feel that the current focus on homelessness allocations and the absolute focus on meeting housing need first and foremost have created unbalanced communities and it is a balance between attractive places to live in the most complete sense that communities are striving for. If we are to succeed in dealing effectively with challenging households, sufficient funding is needed for suitable models of accommodation and support to provide alternative environments to promote independent living skills.

Questions 30, 31 & 32; See Separate Section

Access and Choice

Angus Council believe that across Scotland considerably more central support and emphasis (and resources) are needed to conclude this agenda but that unless there is movement to a Single Allocation Policy then different landlords will approach the allocation of houses from different perspectives and inefficiency in the allocations system will continue. The acceleration of support and resources for common housing registers and allocation policies may have some negatives associated with them (loss of choice in allocations and a greater potential for unbalance communities) but until such times as there is an element of compulsion in the system many will drag their heels and as a result housing applicants will have to worker harder than they should to secure a tenancy.

We welcome the final paragraph of this section and believe that if there is a properly and professionally constructed approach to allocations the prospect of the balanced and

sustainable communities that policy makers and communities alike aspire to may be more achievable, provided this is matched by a suitably robust managerial agenda.

Chapter Seven

Protecting Tenants and Promoting Interests

Angus Council place the highest priority on the development and support of its tenants movement. Anything that brings the tenants closer to the decision making across Scotland on a consistent basis will receive support in Angus.

Regulation

Having been regulated we are well placed to comment on the challenges and opportunities that regulation brings. We are aware of the current movement towards a more proportionate risk based approach to regulation and would support that movement and the potential for a lighter touch for better performing landlords and those demonstrating effective internal audit arrangements.

Protecting Tenants

We believe that the outline proposals contained within this section are best discussed at the national level through COSLA, particularly where intervention in local government is concerned and should be considered alongside the concordat. We also believe that the Scottish Government should review the operation of the impacts of the 2001 and 2003 Act to ascertain whether or not as part of any new legislative programme there are amendments or consolidations required to ensure these Acts deliver the principles and consistency desired in this discussion document

Questions 33 & 34; See Separate Section

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?

We agree that there is a need to increase the number of affordable houses for rent and sale to meet the needs of communities but are not in a position to agree the figure stated in the document given there is little agreement on any national assessment of need and most local needs assessments are disputed at some time. Ministers must work with the sector to come to an agreed understanding of the needs of communities and within communities before any figures can be agreed. We also believe that the position, quality and design of the properties and the involvement of local communities in their design is essential to the long term success of any project. Finally Ministers must also ensure that there is investment in stock across all tenures to ensure decline in the private sector is halted and addressed for the long term.

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?

We believe that the existing housing and planning strategic systems put in place the opportunities for co-operation regionally and that these have been enhanced with the arrangements put in place to respond to the challenge set by the efficiency agenda. Further to this we have also enshrined the need for regional co-operation within the principles that form the foundations of our response to this document. Finally our elected members believe that as important as working collaboratively across local authority boundaries to ascertain and meet housing need is the need to identify and meet needs within communities and that this very local dimension to housing need must not be lost.

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?

Angus Council firmly believes that as many functions and resources should be devolved to local government. Any national function must be restricted to setting the legislative, guidance and financial frameworks, setting the national direction and working with local government through genuine outcome agreements. Ministers must come to a view on how they wish to assess housing need and how that then translates into local assessments to ensure an accurate and agree picture of housing need is reached.

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?

Ministers are already looking into the planning system and how it functions in relation to the speed of development. It is important to strike a balance within the planning system to ensure the right numbers and types of houses are built within an acceptable timescale. The Local Housing Strategy must come closer together within the strategic planning system and once developments have been agreed within this new system there should be a framework agreement whereby the developments are designed and agreed with local communities and then run through the planning system having been developed and accepted from the ground up. Angus Council has already developed its development principles with the SHIP and we believe that the re-alignment of the planning system is now required.

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?

The elected members of Angus believe that this should be a local decision based on local considerations and should not be imposed or controlled centrally. If Ministers are to change the guidance on this matter the Members of Angus Council will be happy to assist Ministers with the development of new guidance.

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

We believe that the LIFT scheme may be better offered as a form of revenue support to an agreed level or until the recipient is in a position to meet their full housing costs.

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

This is probably best done through the tax system but would require agreement with the Treasury. In the meantime discussion could take place with mortgage providers to ascertain whether or not they are willing to develop new products. This is however against the backdrop of a challenging global financial market and a tightening of the risks taken on those on low incomes or who are a financial risk. In the absence of new to market products, one option could be the creation of government back support schemes that might act as bridging for those who cannot afford a certain final proportion of their mortgage costs. Associated with this, it is essential that the lenders provide enhanced advice and assistance to people who find themselves in financial difficulty, to prevent them losing their homes

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

This is a complicated question and would require the Government to be certain that this was the best use of its resources and that there was added value to be gained from such investment decisions. It could be that this might be an option if it were to generate movement within waiting lists and perhaps could be self financing if the grants were to be paid back over time, however, it is accepted that this might not be a political or financial reality at this time. Ministers may also want to spend some more time on their policy in relation to the promotion of home ownership. This may well be the dominant tenure and the most popular desired tenure, but it is against lack of investment in publicly owned properties and a serious decline in the private rented sector. It may well be the case that as the quality and flexibility of renting improves so too the desire of these sectors improve and it is a very real possibility that through good design and management we may actually create a demand for more rented properties.

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 private house building industry will participate in this market if there is an acceptable rate of return for them and it opens up volume markets that balance out the loss of high profit housing if their attention is turned to the lower profit element of the market. As the majority of high volume house builders are PLCs, it is unrealistic to expect them to participate unless they can meet the needs of their own financial backers.

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?

First and foremost we believe that the standards of the property and the landlord must meet an agreed minimum. Secondly we believe that there is merit in allowing the discharging of the statutory duty through the private sector provided the lease arrangements are suitable for a permanent tenancy. Finally, we also believe that the rental level must be affordable. We do however have some concerns that the more widespread use of the PRS may lead to an increase in the need for prevention of homelessness work and also the need to provide landlords with the reassurances that the system will be responsive to their needs whilst at the same time not allowing them to pick and choose who they let their properties to.

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?

As above and as stated throughout the document, there must be a suitably designed system that strikes a balance between the needs of the landlord and those of the tenants and the wider community. In areas of high concentrations of Houses in Multiple Occupation we are aware of a backlash against the numbers of such properties and the behaviours that the settled community associate with such properties. This can only be overcome by a system that is balanced and has the confidence of landlords and the local community.

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?

There is a need for additional funding to allow authorities to fulfill the responsibilities of the 2006 Act. This is a significant gap at present and must be closed if the ambitions of this discussion document are to be fully realised.

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

The PRS cannot be seen as the solution to the current shortage of affordable rented housing as the majority of lets are on short assured tenancies. The PRS could however be used to relieve pressure as a temporary measure but as noted above to ensure the equitable use of the system, a balance will need to be struck and local systems resourced to run properly controlled and regulated markets. We must also be mindful that the PRS is acting as the main provider of accommodation for migrant workers and we would be concerned if the move to house homelessness clients displaced existing groups who are just as in need of accommodation.

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

As above with the additional of any possible tax incentives. Quality must be safeguarded and the ability to pick and chose tenants must be tightly controlled.

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

Landlords or owners must be encouraged to invest in properties so that they are brought and kept in use, if this does not work then some form of intervention scheme may have to be developed as the previous incentive schemes did not prove to offer value for the investment made.

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

Yes

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, but we are unsure of the definition of need in this context. We await the detail of the incentive scheme with interest.

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

We agree that it is essential to demonstrate value for money for the use of public resources. We believe that there are already locally developed examples of how this has occurred without central intervention and would support locally developed proposals (which may well cross administrative boundaries) rather than centrally driven and controlled schemes. Local schemes could become part of the LHS and the outcome agreements which are being developed.

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

We are concerned that the response to any reduction in subsidy will deliver a reduction in quality and a two or three tier system of housing building design and standards. RSLs have grown used to the current levels of subsidy and rents remain much higher for new build properties so this change will prove to be extremely challenging.

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

We agree that there is a need for alternative responses to meet housing need. Any public subsidy must be directed at improving standards and/or affordability and also ensuring access to such properties for those on housing waiting lists.

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

We believe this is best managed through local schemes building on the national direction set by government in conjunction with stakeholders. Any scheme this is developed must have considerable local input and local democratic oversight.

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

Provided local authorities are appropriately resourced, this should be built into the LHS system.

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?

The first question that arises is what is the definition used of mixed sustainable communities? There is certainly a stock imbalance created by the right to buy. We agree that there is a need for re-profiling across Scotland and that this may mean removing some of the more unpopular housing and replacing that with new build properties that better meet people's needs and aspirations. We accept that this may actually reduced the

numbers of properties but will increase the number of desirable properties and should reduce the management costs associated with unpopular areas or property types.

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

We believe that we should explore all options to ensure we generate the best value for the limited public resources available to us. We do not believe that we should be caught up in an argument about definitions of landlord or provider, and would rather focus on the quality of the property and its management and also on the long term use of that property to meet housing need. We believe that this is something best developed and managed locally within a national framework.

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

As discussed throughout this document this should be enshrined in a balanced rights and responsibilities agenda that is managed locally.

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 believe that this is something that should be managed locally and be updated annually to reflect the changes in local incomes and house prices especially given the volatility of both incomes and housing prices. Local management of the system will encourage a more business like approach to property management and may assist in driving up standards of management.

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

Unless there is a debt write off and appropriate financial support it is unlikely that they will have long-term future. We do however see some potential in using the principles of ALMOs to buy and sell land to ensure a suitable supply of affordable land is available for development to create a certainty of provision and of investment of public resources.

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?

As an authority who has invested heavily in its stock for a considerable period of time we find this a difficult question to answer. We do not wish to see any tenant reside in poor quality properties; however we have managed to invest in our stock, retain a low debt position and still deliver low rents and good quality housing management, and to see those, who have not taken the decisions we have, be rewarded with additional subsidy creates a certain level of concern that poorer performance is rewarded and not those who are performing well.

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

As raised above there is a sense of injustice in rewarding poor performance however we acknowledge the fact that tenants should not be forced to live in poor accommodation. We

also acknowledge that the fact that we are performing well against the SHQS and the inspection regime that we will benefit for a lighter touch in regulation and scrutiny.

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

We understand that this has been addressed in the newly issued SPP11. We also believe that there should be a flexible approach to this and that this should be designed and implemented locally.

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

As highlighted we use the existing six acre standard and use our powers under section 75 agreements to ensure density and financial are not allowed to over-rule the need and desire for good quality environments.

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?

We believe this should be vested in Community Planning Partnerships.

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

We agree with an approach based on proportionate risk.

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 are more concerned with how the functions of regulation are discharged and that they are done so on a balanced and proportionate manner that supports continuous improvement whilst minimising disruption to service delivery.

Conclusions

Angus Council believes that this discussion document offers the potential to radically alter the housing landscape, if an objective view is reached as to the type of development and management system required to create and sustain balanced and sustainable communities. We believe that landlords must be given the tools and backing to not only achieve such balanced communities but also sustain them. We believe that this document has real potential provided this Government listens to those stakeholders who are delivering services day in and day out. There is a balance to be struck between the focus on development and value for money, on standards of build and the environment and on how to professionally manage tenancies and communities. It is clear to our communities and to many of our tenants that this balance requires adjustment and there is great hope that this paper will provide that adjustment.