



Local Government, Housing and Planning Committee
Housing to 2040 Review: TIS Scotland Evidence Submission

February 2024



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1. Who are TIS

1.1

The Tenants Information Service (TIS) are leading experts in promoting innovative tenant participation, community engagement, and self-assessment through tenant-led scrutiny practice.

1.2

Established in 1989, TIS is the leading national charity providing innovative tenant participation learning and development services throughout Scotland. TIS has an unrivalled track record of developing innovative community engagement and participation practice and carrying out consultation exercises to assist communities to influence change at a local and national level. Our aim is simple; we want to support communities to influence change.

1.3

We have extensive experience working with tenants, local authorities and housing associations throughout Scotland, providing specialist information, advice, engagement, participation, community consultation and action research, along with associated staff and community learning and development services.

2. Background

2.1

On 15th March 2021 the Scottish Government published [Housing to 2040](#), Scotland's first long-term national housing strategy. Housing to 2040 sets out a vision for housing in Scotland to 2040 and a route map to get there. It aims to deliver the Scottish Government's ambition for everyone to have a safe, good quality and affordable home that meets their needs in the place they want to be.

2.2

The strategy outlines the Scottish Government's commitment to continue to provide affordable homes across Scotland, in particular homes for social rent. It sets an ambition to deliver 110,000 affordable homes by 2031-32, with at least 70% for social rent, which will make a vital contribution to tackling poverty and working towards ending homelessness.

2.3

On 19th December 2023 deputy first minister and cabinet secretary for finance Shona Robison MSP, announced [the 2024-25 Scottish Budget](#) that will see the budget for building social homes reduced by almost £200m for 2024-25 – a reduction of 26%. The Budget proposed a reduction in spending on housing and building standards from £738m in 2023-24 to £533m in 2024-25, including a reduction of almost £190m to housebuilding.

2.4

The proposal to cut almost £200 million from the Affordable Housing Supply Programme (AHSP) has been publicly met with widespread criticism by many of Scotland's housing

sector stakeholders and leaders, citing significant concerns it will further exacerbate existing pressures, such as poverty and homelessness.

2.5

The Local Government, Housing and Planning Committee agreed to undertake a short inquiry to consider how the Scottish Government's housing policies are aligning with the ambitions of Housing to 2040. Furthermore, it intends to consider whether the ambitions of Housing to 2040 continue to address Scotland's complex housing needs.

2.6

The Committee agrees to focus its scrutiny on the following areas for consideration:

- Are we building enough homes or bringing enough homes back into use to meet Scotland's current and future housing needs?
- Are we building homes with a focus on placemaking?
- Are we creating and sustaining a mix of housing that is financially and physically accessible to all?
- Are we building homes and retrofitting existing homes to provide for affordable warmth and zero emissions?
- Are we ensuring that new and existing homes are safe and of a high quality?

3. TIS consultation

3.1

TIS has consulted its members (both housing organisations and tenants) on the Local Government, Housing and Planning Committee areas for consideration to ascertain views and feedback with the aim to support the enquiries findings and recommendations. Our key findings are detailed below to support the Local Government, Housing and Planning Committee's enquiry.

4. Key Findings

4.1

TIS members, both housing organisations and tenants, were consulted between 29th January and 2nd February 2024. The following quantitative and qualitative data was captured:

Are we building enough homes or bringing enough homes back into use to meet Scotland's current and future housing needs?

Landlord Response:

When asked if we are building enough homes or bringing enough homes back into use to meet Scotland's current and future housing needs; 25% of landlord respondents felt we were, in comparison to 75% who felt we were not.

“There is a need for a national strategic review in the face of overwhelming inflationary costs and increasing housing pressures. In addition, it was highlighted that there cannot be a “one size fits all” approach, as the experience of many central belt local authorities cannot be compared to the North-East and rural island authorities as the scale of challenges differs. A specific example being where Aberdeen City Council has over 1700 empty council homes – and that is after 600 were made available for Ukrainian refugees – highlighting a mismatch of supply to demand. Aberdeen City Council has undertaken a massive new build programme, making their existing stock less popular – particularly those areas experiencing some of the worst deprivation areas in Scotland. The new build programme has drawn a lot of resource away from bringing existing homes back into use or maintaining them to the required standard. In comparison, there is a major shortage of affordable homes in Glasgow and Edinburgh.”

“There has been, and continues to be, a lack of social housing new builds over the past 10-20 years which is evident through the declaration of housing emergencies by three local authorities. It is expected that more local authorities will make similar declarations. The issue is not to do with current stock, but with the number of homes available. Social housing in Scotland is amongst the best homes to live in the country according to the Energy Efficiency Standard for Social Housing (EESH) data. With the impending requirement to meet increased energy efficiency and net zero standards, it will require further considerable investment; this is funding which could be used to deliver more new build. We would like to see the government to propose a target for new builds that is realistic and achievable, unlike the current targets. It is demoralising knowing that the existing target is unachievable, especially in light of the cut to funding for social housing in the latest budget.”

“It is clear that the outturn figures for the delivery of affordable homes demonstrate that the Scottish Government’s national target is no longer achievable.”

“The reduction in the AHSP budget in 2024-25 places significant uncertainty on future progress and long-term planning. A long-term commitment to AHSP funding is required to continue to deliver affordable housing in Scotland.”

Tenant Response:

100% of tenant respondents felt we were not building enough homes or bringing enough back into use.

“There are thousands of buildings that could be brought back into use (i.e., empty homes and shops) to reduce housing waiting lists, and in particular reduce homelessness. We do need more affordable social homes, however, if we continue to build, we will have very little green space left.”

“Although we need to continue to deliver more new build affordable social housing, we need to prioritise investment in existing older housing stock to bring it up to a better standard.”

“It is clear from statistics around increasing homelessness and the continued use of temporary/emergency accommodation, as well as increasing waiting lists for social housing, that there is not enough social housing in Scotland to meet demand.”

“Most “affordable” houses that are being built are for private sale and not for social housing. However, the next generation can’t even afford them or are in a position to buy them.”

“There continues to be a massive underinvestment in social housing across Scotland, and in particular rural communities.”

Are we building homes with a focus on placemaking?

Landlord Response:

50% of landlord respondents felt we are building homes with a focus on placemaking. 25% feel we aren't, and 25% were neither in agreement nor disagreement.

“Many local authorities and social landlords will have placemaking at the heart of its decisions – however there is often a delay between the delivery of major housing developments and the provision of the wider infrastructure, such as transport, education, etc. An example of this is the Countesswells project on the outskirts of Aberdeen, which had hundreds of homes built (all tenures) years before the school, shops, etc. were provided.”

“Social housing has always considered placemaking within communities, however the same cannot be said for private housing developments, where placemaking is an afterthought.”

“Pressures of land costs alongside the need to build homes as quickly as possible means new build are often in areas that are not adequately linked or connected with wider key services. Too often homes are dropped in the middle of green belt land.”

“Locally and nationally, there are some excellent examples of effective place making being incorporated into development and regeneration projects.”

Tenant Response:

86% of tenant respondents feel we aren't building homes with a focus on placemaking, with the remaining 14% neither in agreement nor disagreement.

“I'm not entirely sure if we are or not. To me housing developments appear to be built far too quickly and far too tight together. It is not a home in my opinion if that happens.”

“There's not enough time spent on consulting on what the community actually wants and needs. Too often they think they know what we want or need and make decisions on our behalf.”

“Personally, I don't think we are. Certainly not council housing. The houses being built are not suitable.”

“There should be a focus on where there are employment opportunities and links. We can't keep building housing estates where there is no transport available.”

“Feedback from our tenants is that there is often not enough consideration given to infrastructure such as GP's, dentists, shops in areas where new housing developments are constructed.”

Are we creating and sustaining a mix of housing that is financially and physically accessible to all?

Landlord Response:

75% of landlord respondents feel we aren't creating a sustainable mix of housing that is financially and physically accessible to all. The remaining 25% were neither in agreement nor disagreement.

"There is evidence of a mix of tenure options being provided by a number of social landlords, particularly for social rent, but with a focus on Section 75 delivery of affordable homes – there are limits to the number of new homes that permit physical accessibility for all. One good example is Moray Council who have stipulated that many Section 75 homes have to be for particular needs, hence developers are providing RSLs with Bungalows in Elgin and elsewhere. However, it is of more concern that new build only adds about 1% per annum to the stock – so accessibility to the existing stock is limited, and on many occasions, landlords are not able to do enough to keep up with demand for adaptations (grant access limitations)."

"As a country, Scotland has fallen way short of the target set in the current housing action plan. Social housing of some form should be a necessity for inclusion in any new build site. The cost of homes is becoming unaffordable for most with the hike in mortgage interest rates, and of course the huge sums charged for private rent are worrying. The rent cap has no doubt helped a lot of private tenants, but for how long... I feel at times RSL's, private landlords and private house builders are grouped together but couldn't be any further away from each other in terms of what they want to achieve. Private rented stock in Scotland should be a focus for legislation and improvement."

"Many new build properties are in areas which are not serviced by public transport and people either rely on cars or walking. For anyone with mobility needs that doesn't drive, these homes are not accessible. We are also not providing enough homes that are mid-market rent. Pressure on social housing could be relieved if high quality, affordable private rented homes were available to more people."

"Owner-occupation and the private rented sector is beyond the financial means of many people on limited or even moderate incomes."

"Affordability and accessibility are a primary concern within the social rented sector. Affordability in the social rented sector needs to be considered against the long-term role which the sector could play in meeting the needs and aspirations of people in a broader range of socio-economic circumstances."

Tenant Response:

86% of tenant respondents feel we aren't creating a sustainable mix of housing that is financially and physically accessible to all, with the remaining 14% neither in agreement nor disagreement.

"Not at all - homes are being built that cost more than the average person can afford to run or keep. They are also not really built to long-term withstand changing weather climate Scotland is having."

“Much housing on the private sector is beyond most peoples' reach. In addition, increases in fuel bills and the cost of living has not helped.”

“Building is often focused on larger family homes, rather than addressing older persons or needs based housing.”

“Feedback from our tenants has been that there are not enough accessible homes being built. In Edinburgh tenants believe that there are not enough affordable homes being built and that mid-market rents, which are often pitched as affordable, are still too expensive for many people.”

Are we building homes and retrofitting existing homes to provide for affordable warmth and zero emissions?

Landlord Response:

75% of landlord respondents feel we aren't building homes and retrofitting existing homes to provide for affordable warmth and zero emissions. The remaining 25% were neither in agreement nor disagreement.

“New build is to the highest standard of insulation – where financially viable.”

“This cannot be rushed due to the vast amount of money required to retrofit and deliver zero emissions. The cost of installing one Air Source Heat Pump (ASHP) for example could replace four gas boilers that are in need of renewal, meaning planned programme of works will keep being extended which eventually will hit a breaking point.”

“Overall, this has been successful, but there needs to be recognition that some retrofits are not financially or practically possible - extremely expensive retrofits simply pass costs onto tenants via increased rents to cover the expense, which may even be more than savings made through energy efficiency.”

“While new homes are being built to support affordable warmth, the retrofit agenda provides a significant financial challenge for social landlords and across all other tenures.”

Tenant Response:

Only 14% of tenant respondents agreed that we are building homes and retrofitting existing homes to provide for affordable warmth and zero emissions, however 86% disagreed.

“There isn't enough support for tenants to reduce or tackle increasing and unsustainable energy costs. I don't get out much, for health reasons, and use an astronomical amount of electricity and gas to stay warm in my home.”

“There is no such thing as zero emissions, and given the lack of serious funding from the Scottish Government, their targets are unachievable whilst also keeping tenants rents affordable.”

“Most of the existing social housing stock in Scotland are too old to be successfully retrofitted or brought up to modern day standard within reasonable costs.”

“Although there is evidence of retrofitting homes in Edinburgh, this progress is not happening quickly enough and there are many people who are not able to achieve affordable warmth and zero emissions due to fuel poverty and the decline in the physical condition of the buildings.”

Are we ensuring that new and existing homes are safe and of a high quality?

Landlord Response:

100% of landlord respondents agree that we are ensuring that new and existing homes are safe and of a high quality.

“Notwithstanding that in Grampian’s case we rely a lot on Section 75s – many developers will comment that because of our additional scrutiny at construction stage and our extra requirements (fixtures & fittings etc.) that our homes are better than those they are selling on the open market on the same site.”

“RSL’s have an obligation to ensure their tenants are safe and rely very much on the professionalism of the contractors involved.”

“The EESSH and SHQS have set out rigorous standards for social housing properties.”

“Safety within the social rented sector is of paramount concern for landlords.”

Tenant Response:

57% of landlord respondents agree that we are ensuring that new and existing homes are safe and of a high quality. However, 43% disagreed.

“Are homes safe and high quality - not really - they are built far too quickly. The new homes seem to have more issues than older built homes. The developers are keen to build as quickly as possible to gain as much money for as little output as possible.”

“Having inspected recently built homes in North Lanarkshire I am convinced that new Homes are safe and of high quality.”

“There’s not enough housing being built and those that have a significant number of issues that have caused negative effects for those living in these properties.”

“For new builds, but not for older properties.”

“Tenants in Edinburgh have reported issues in newly built homes which suggest that there is still significant work required to ensure that all new homes are of a high standard of safety and quality.”

5. Conclusions

5.1

TIS would like to thank all landlords and tenants who assisted in this consultation through participating and providing information and feedback. This has been invaluable to the process.

5.2

TIS would like to highlight the importance of supporting tenants to influence positive change in housing service delivery through proactive tenant participation, community engagement and self-assessment through tenant-led scrutiny of housing services and investment. TIS recommend that the Scottish Government continue to support tenants to influence the delivery of Housing to 2040 at local and national levels and ensure that they are fundamental to the monitoring and evaluation of the delivery of Scotland's first long-term housing strategy.

5.3

We trust our key findings and recommendations will support the Local Government, Housing and Planning Committee's enquiry to ascertain if the Scottish Government's housing policies are aligning with the ambitions of Housing to 2040 and specifically whether the ambitions continue to address Scotland's complex housing needs.