

Commission on Housing and Wellbeing Consultation 2014

North Lanarkshire Council Response

Section 1: Our assessment of the importance of housing for wellbeing in Scotland

Q1 Has our assessment of housing and wellbeing missed any important benefits and, if so, which benefits and what is the evidence for this?

- The Council has been focusing on housing, health and wellbeing for a long time and recognises that the affordability, condition; type and location of housing can each have an impact on an individual's health and wellbeing.
- Consideration should be given to air quality/ventilation as this directly impacts on the wellbeing of households i.e. recognised impact on rates of respiratory health (asthma rates).
- The importance of accessible/ barrier free housing incorporating dementia friendly design should also be highlighted in enabling people to live independently in their own homes in their own communities

Q2 Has our assessment exaggerated any of the benefits of housing for wellbeing and, if so, in what respects and what are your reasons for saying this?

- The benefits of good housing cannot be underestimated, and the 8 identified types of wellbeing are interlinked with and interdependent of each other.

Section 2: Does Scotland invest enough in housing?

Q3 Do you agree with our assessment of the current position on investment in housing?

- Although recent uplifts in grant levels and increases in overall housing investment is to be welcomed and should be acknowledged, the overall level of housing investment is insufficient to meet the need for affordable housing of the right type, size and in the right locations. Increased investment across all tenures is necessary to ensure properties are maintained and habitable for future use.
- Further investment is required in relation to specialist housing provision to meet the needs of an ageing population across all tenures, including investigating the use of equity release schemes within the private sector.
- Continued austerity and failing condition of private sector homes continues to cause issues for both owners and private renters in relation to management, maintenance and fuel poverty.
- In terms of new build investment (increasing the supply) each geographical housing market has its own identified response (i.e. via the Housing Need and Demand Assessment) and so the level of investment required is relative.
- The balance within the housing market needs to be carefully maintained as oversupply can have a detrimental impact for both owners and social landlords. In considering housing investment requirements it is necessary to also consider the need for investment to address mismatches in supply and demand, and the need for re-provisioning to replace obsolete stock or address regeneration priorities.

Q4 Do you agree with our brief assessment of current policy on investment in housing?

Yes.

Q5 Do you agree with our suggestions for further action in the area of investment in housing?

- The Council broadly agree with the proposed actions suggested, however, each local authority area has market drivers specific to that area and the income profile and economic activity within an area, combined with the current stock profile, will influence the range of possible housing options for that area including other private sector affordable housing such as Below Market Rent and Low Cost Home Ownership.
- In terms of existing housing, it is unclear how compliance with SHQS within the private sector could be effectively monitored without large scale house condition surveys being undertaken which would require considerable resources. The regulation and monitoring of this would be unwieldy to implement.
- The Council would welcome a Scottish Government review, undertaken in conjunction with local authorities, on the need for investment in private sector housing and the effectiveness of powers introduced through the Housing (Scotland) Act 2006.
- It is not clear what is meant by 'action on land supply' - in our area it is not an increase in land supply that is required but rather a need for development on the sites that have been zoned for residential development, and in some cases already have planning permission.

Q6 Do you have other suggestions that we have not mentioned in relation to investment in housing

- There is a need for the Government to fulfil the commitment to establish a National Lending Unit to provide loan funding to enable owners to carry out essential works.
- There is a need for greater certainty over resource allocation for the Affordable Housing Supply Programme rather than the current drip feeding of funding that is detrimental to long term, effective planning and delivery.
- Additional top up funding to support strategically important sites that may have higher development costs, ie due to poor ground conditions; infrastructure requirements etc.

Section 3: Getting a better fit between housing and the economy?

Q7 Do you agree with our assessment of the current position regarding housing and the economy? What would you add?

Yes

Q8 Do you agree with our assessment of the current situation of UK Government policy with regards to the housing market and the economy?

- The Council broadly agree with the assessment of the current position.

Q9 What are your views about the five areas of policy reforms suggested here?

- The Council agree in principle with the priorities identified in Section 3 although any reform of council tax would have to be done in full consultation with local authorities given the potential impact on its funding and therefore ability to deliver essential services.
- Local authorities' Local Housing Strategies and Local Development Plans along with the Strategic Development Plan are tasked with setting Housing Supply Targets, which set out the requirement of land for new supply housing based on household projections, income and house price. Authorities are asked to apply 'generosity of 10-

20%' per Scottish Planning Policy. The availability of suitable land for development obviously varies on an area by area basis. There is a need to ensure a balance between the release of more land and the need to support the development of brownfield sites to help create sustainable and balanced communities.

Section 4: Getting a better fit between housing and welfare policy?

Q10 Do you agree with our assessment of the current position regarding housing and welfare benefits? What would you add?

- The cost alone of Housing Benefit should not necessarily be the determining factor in deciding what changes are required. It would be more useful to consider the varying costs of Housing Benefit compared with the value provided. Social rented housing on the whole provides excellent value for tenants and tax payers in comparison to private rented options.
- Unfettered access to Housing Benefit has encouraged the buy to let market and attempts to contain it through the introduction of LHA has had limited success in some areas, particularly where there is limited social rented stock. In such areas Housing Benefit inflation is most pronounced whereas the social sector Housing Benefit in the same areas has barely changed.

Q11 Do you agree with our assessment of the current situation of government policy at UK levels and the possible outcomes post-referendum? What would you add?

- The potential devolution of housing benefit and other areas of welfare is currently being considered by the Smith Commission.

Q12 What are your views about the medium term policy options presented here? What other ideas and issues strike you over this time frame?

- The implications of merging the housing benefit budget with the housing budget would require further careful consideration and analysis in terms of potential regional variations and potential for a postcode lottery in terms of access to subsidy to pay for housing costs. The potential for increased administration costs would also need to be carefully considered.
- The council strongly supports the abolition of the bedroom tax which takes no account of local circumstances/ available stock

Q13 Do you agree that we have a unique opportunity to consider longer term policy options over the next key period in Scotland's history? How do you respond to the options proposed here? Are there other options that should be considered?

- Transferring the Housing Benefit element of personal benefit to the recipient on the grounds that it will improve personal responsibility may be a desirable policy but needs to be managed carefully and gradually to enable the necessary capacity building to cope with change. However, consideration needs to be given to personal choice as many households will choose to have their housing payment made direct to their landlord.

Section 5: Getting a better fit between housing and the environment

Q14 Do you agree with our assessment of the importance of housing to the environment?

- The Council agree that considering sustainability in the wider housing sense is important. In order to achieve our country's 2020 commitments it is recognised that the use of cleaner energy, increase in use of renewable and local community schemes such as district heating/microgeneration is essential.

Q15 Do you agree with our brief assessment of current policy on housing in relation to the environment?

- The success of policy responses in terms of the installation of energy efficiency measures is wholly dependent on the participation of home owners. Limited funding for home owners living in 'hard to treat' properties is a barrier to their engagement/participation in Government schemes.

Q16 Do you agree with our suggestions for further action in the area of housing and the environment?

- In terms of your medium term suggestions it should perhaps be noted that Home Energy Scotland is the vehicle for providing information and advice for these schemes and providing information and guidance to owners, although more effective promotion of HES as the centralised information hub would be beneficial
- Funding should be increased for 'hard to treat' homes as this is the main barrier for home owners to improving the efficiency of their homes due to capped funding.
- There are affordability issues to take into consideration when considering legislation that would compel home owners to improve the energy efficiency of their homes.
- The Council agree with your longer term suggestion that micro and community generation projects should be promoted. However, it should also be recognised that these have a number of constraints such as suitable land, location, grid capacity etc.

Q17 Do you have any other suggestions that we have not mentioned in relation to housing and the environment?

- Given that buildings have been constructed to meet the building regulations at the time of construction, it is difficult to see how home owners can be held responsible for improving energy efficiency at the point of sale or any other time.
- At this time the main legislative obligation in relation to energy efficiency in the private rented sector is the Repairing Standard and the requirement for an Energy Performance Certificate at start of a new tenancy. There is no such requirement at point of sale of a private property. Introducing such a requirement could be problematic due to constraints in relation to house type and construction and whether this would be enforceable.

Section 6: Housing and health and education?

Q18 Do you agree with our assessment of the importance of housing to health and education?

- The Council agree in principal with the assessment of links between housing, health and education, however, the section lacks coherence and is very disjointed.

Q19 Do you agree with our brief assessment of current policy on housing and health and education?

- The Council agree that Homelessness, Fuel Poverty, Overcrowding and Older People are all policy areas requiring further interventions, however there are other policy areas that also have a major contribution to improving health, well-being and educational attainment, including tackling serious disrepair, particularly in the private sector; increasing supply and availability of accessible/ wheelchair housing, tackling anti social behaviour and improving community safety and ensuring availability and access to appropriate housing support services.
- The section does not seem to take account of the significant progress made in the integration agenda to date, including the various housing contributions made to the national debate.

Q20 Do you agree with our suggestions for further action in the area of housing and health and education?

- The link between homelessness and mental health issues is already acknowledged by local authorities with considerable joint working in place to improve services. The new Health and Social Care Integration Agenda will contribute to improving this specific area to meet the needs of individuals.
- It is acknowledged that poor quality housing, anti-social behaviour, overcrowding and fuel poverty contribute to a cyclical pattern of occupiers unable to attain optimum health and educational attainment.
- Suitable and proportionate regulation can assist in certain circumstances with regard to house condition but financial constraints contribute to fuel poverty and are more difficult to address. Authorities deliver a range of Welfare Rights and income maximisation services to improve residents' financial position.

Q21 Do you have other suggestions which we have not mentioned in relation to housing and health and education?

- It would be worth considering equity release schemes to assist owner occupiers to carry out require repair and maintenance to their properties which would prevent property condition deteriorating and improve current living conditions.
- There is no reference to the broader economic conditions that are impacting on public services ability to continually deliver more for less. It would have been useful to see some potential solutions set out in this report.
- Further evidence is needed to support the assessment made in this report. The document has taken little account of significant improvements made to homelessness policy and practice over the last ten years.
- Comments in relation to older households appear somewhat dated considering the significant progress made in recent years via Change Fund and use of telecare, dementia friendly developments and smart homes etc.

Section 7: Housing and community regeneration

Q22 Do you agree with our assessment of the importance of community regeneration?

- Yes, Housing plays an important role in community regeneration and tackling the wider issues faced by local communities. Local authorities are committed to delivering improvements through their Single Outcome Agreements and Community Planning Partnership structures, and the council's Local Housing Strategy also identifies community regeneration as a strategic priority.
- The Scottish Government's focus on delivering its housing supply target may have resulted in a shift of focus away from regeneration priorities, which may involve higher unit costs and/or re-provisioning of obsolete stock. There is a need to give community regeneration a higher strategic focus, both nationally and locally. In particular there is a need to address the increasing problem of disrepair and poor management within the private rented sector which is often concentrated within areas of deprivation.

Q23 Do you agree with our brief assessment of current policy on community regeneration?

- Yes, within North Lanarkshire we have an excellent record of partnership working and have consistently received positive feedback from previous audits

Q24 Do you agree with our suggestions for further action in the area of community regeneration?

- We agree with the further proposed actions. However, within North Lanarkshire we have tried and tested structures with our Local Area Teams and Local Area Partnerships which are headed by our Community Regeneration team who facilitate, mediate and broker with all council and partners to improve service delivery.

Q25 Do you have other suggestions which we have not mentioned in relation to community regeneration?

None.

Section 8: Do we need a more robust private rented sector?

Q26 Do you agree with our views on the need for a more effective private rented sector which can make a greater contribution to meeting housing needs?

- Yes. The Housing (Scotland) Act 2014 attempts towards provision of a more effective private rented sector by for example introducing a first tier tribunal to deal with disputes, providing additional recovery powers and placing additional requirements on landlords such as 5 year electrical checks. Until rolled out it is not possible to gauge the effectiveness and impact of these changes on the private rented sector; however we would support the view that a more effective private rented sector is required.

Q27 Do you agree with our brief assessment of current policy on the private rented sector?

- Conditions within the private rented sector are considerably varied across Scotland and local authorities. The improvements and measures introduced by the Housing (Scotland) Act 2014 should hopefully assist in delivering a more robust and fit for purpose private rented sector across Scotland but until put into practice it is not

possible at this stage to assess how effective this will be and further review would be required. The cost of implementation also needs to be considered at a time when local authorities are facing significant reduction in funding.

Q28 Do you agree with our suggestions for further action in the private rented sector?

- Local authorities will have considerable responsibilities to progress through the Housing (Scotland) Act 2014.
- The Council would not support the view that Landlord Registration has been entirely ineffective, but would welcome a review to streamline the process. It is felt to be inappropriate unrealistic to consider replacing Landlord Registration and HMO with a targeted approach. Housing problems occur for a variety of reasons and are not specific to areas of deprivation and poor quality landlords.
- Recent changes to legislation have given local authorities greater powers to take landlords to task for failing in their duties with regard to repairing issues. However the resource implications of this require further consideration and any additional regulation requires to be self financing.
- HMO Regulations have been amended to ensure more protection for tenants but the process can be cumbersome. The Council would welcome changes if a better alternative could be identified.
- We would support institutional investment and the development of RSL subsidiaries.

Q29 Do you have any other suggestions that we have not mentioned in relation to the private rented sector?

- None.