

Your details

Please complete the following details below. It is essential that we have a name and the name of any organisation if you are responding on their behalf. Contact details would be helpful if we need to follow up on any points.

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Would you like us to keep your response confidential:	No	

Consultation questions

Below you will find response boxes for each of our consultation questions. If possible, please base your response on answers to these questions.

Some questions may be somewhat irrelevant to your interests, in which case please feel free to answer as many or as few as you like. And please feel free to offer other comments if you think they are relevant to our remit. There is space at the end for you to do so.

You can skip to the section(s) that you wish to respond to through the links below:

1. [Wellbeing](#)
2. [Housing and investment](#)
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Section 1: Our assessment of the importance of housing for wellbeing in Scotland

Q.1. Has our assessment of housing and wellbeing missed any important benefits and, if so, which benefits and what is the evidence for this?

The assumption is made that all households aspire to home ownership. There are households which choose to live in the PRS because they do not want the burden of a mortgage and the cost of insurance and repairs and who also want the flexibility to move.

It must be recognised that many of those not buying their own homes would certainly not regard themselves as “housing have-nots”. Likewise, those who bought their homes at the peak of the market and now find themselves in negative equity would disagree with the Commission’s assessment that, because they own their own home, they are “housing haves”.

Paragraph 1.4 lists the benefits provided by good quality housing. As well as heating and thermal insulation the need for adequate ventilation should also be listed. Air quality is vitally important and may become more of an issue for building condition and human wellbeing as homes become more air tight for energy efficiency purposes. Housing is also more than just the building in which one lives. We would also like to see aspects of the wider community such as those listed in the 8 types of wellbeing on p10 such as the close proximity of amenities and security from crime and anti- social behaviour added to the list.

Q.2. 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?

As described above, the benefits of home ownership have been misrepresented and the active choice to rent must not be ignored.

Section 2: Does Scotland invest enough in housing?

Q.3. Do you agree with our assessment of the current position on investment in housing?



New Housing

We support the drive to build more houses to ease the pressured hotspot areas. The expansion of empty homes work should also be encouraged as this not only brings empty homes back into use but also has a wider effect on improving communities which can be blighted by empty properties in declining condition.

Attracting institutional investment is important but could potentially miss the needs of many rural communities. Scottish Land & Estates appreciate public finances will most likely be under pressure for years but private landowners need to be supported in building small rural housing developments, for sale or rent, so that struggling communities can justify facilities and amenities and communities can thrive. It has also been shown, and should be recognised, that the private sector can deliver greater value for money than the social sector can. This is why it remains incredibly frustrating to see so much support going to the public sector when resources can be made to go further when directed at the private sector. We would hope to see a similar scheme to the Rural Homes for Rent pilot which was launched in 2008. This provided funding to landowners to develop affordable housing. As was the case with the Rural Homes for Rent pilot we support that anyone in receipt of PRS funding should have to comply with Landlord Accreditation Scotland standards. This ensures the funding is directed at those capable to manage it effectively.

In 1999 Kincardine Estate delivered 14 homes for affordable rent. The project was grant-aided by Scottish Homes (Scottish Government) and for the same amount of grant a Housing Association would have only delivered 8 houses. The houses are leased at affordable rents and 75% of the vacancies are offered to the local authority for nomination of tenants (50% is normal for RSLs).

Existing Housing

Paragraph 2.3 the Commission refers to the Scottish Housing Quality Standard (SHQS) and the potential to apply it to the private sectors.

There is a misconception that the PRS is unregulated which is far from the truth. Through the tolerable and repairing standard, safety regulations, and optional accreditation schemes, the quality expected in the PRS is set at a high standard and there is clear recourse for those who feel their property is not meeting these.

If these different standards were to be applied to the PRS private landlords with one or two houses (the typical portfolio) will often not have the resources from rental income to meet them as well as cover mortgage payments. The social sector struggles to reach these standards despite the levels of funding they receive. The PRS would have to be offered similar levels of funding if they were expected to meet this different set of standards.

The works of the REEPS group should be used to advise policy on improving energy efficiency in the private sector. Our members are fully behind improving the condition of their properties and many have begun work improving the energy efficiency. However, as identified in the REEPS groups traditional properties require special care. If the appropriate methods and materials are not used the house and its occupants are at risk. As the REEPS work comes through into consultation stage Scottish Land & Estates hopes this is appreciated and will be suitably addressed.

Owner occupiers should not be forced into adapting their homes to standards which may be unsuitable or undesirable for them. Many owner occupiers are struggling with household costs and will naturally carry out repairs to ensure their homes are in good condition but they will do this at their own pace within their means and to standards that suit them. There are measures already in place for Local Authorities to intervene if properties are particularly neglected or dangerous.



There are a number of fiscal obstacles to investment in the PRS which should be recognised.

- a) Property rental is not regarded by HMRC as an investment activity rather than trading activity. Losses on property cannot be offset against income from other trading activities. This curtails the ability of landlords to cross-subsidise their property business and encourages property owners to lease their houses for self-catering holiday lets (which is regarded as a trading activity) rather than for full-time lets.
- b) VAT is imposed on most building works apart from new build housing. It is not recoverable by the landlord.
- c) Capital Taxes: Trading Businesses are favoured by Business Property Relief for the transfer of ownership from one generation to the next. No such relief is available to PRS landlords.
 - a. The danger is that, on transfer, a landlord is liable to pay 40% Inheritance Tax (IHT) on the open market value of his properties. This will likely compel the landlord to sell properties to cover the tax demanded. Those delivering the lowest yield (i.e. the affordable rented ones) will probably be the properties to sell and when sold will migrate to the open market for rent or owner occupation. Thus current IHT provisions will force landlords out of their existing provision of affordable rented housing making the problem worse.
 - b. Lifetime transfers are not facilitated as Capital Gains Tax (28%) will be imposed with a similar, albeit lesser, effect as under a. above.

To avoid current tax measures eroding the existing provision of affordable rented housing by the PRS action must be taken soon to support the sector. See potential solution below.

An alternative approach would be to re-classify PRS letting as a trading business. The problem with this would be the difficulty of ensuring only responsible landlords benefitted and delivered the intended product of good quality affordable rented housing.

Conditional Exemption from IHT for Affordable Housing.

Conditional Exemption from IHT has long been available for works of art and occasionally for landscape areas of special significance. In return for the exemption the public gains access to the land/art for specified periods – often this is for 28 days per year.

A similar condition could be applied for the delivery of affordable housing except that the gain to society would be less subjective and more extensive, as it would run for 365 days per annum.

Suggested Conditions that apply to this exemption:

- The properties are rented at or below affordable rent i.e. 80% of Local Housing Allowance
- The properties are managed and maintained to accredited standards.
- Local Authorities should be responsible for monitoring that the above two conditions are being met.

What would this deliver?

- a) It would secure the existing provision of affordable housing
- b) It would encourage landlords currently renting above the affordable threshold to lower rents to affordable levels, increasing the supply of affordable rented housing.



- c) It would encourage the return of self-catering properties (currently treated as trading activity and therefore eligible for BPR) to full time rental – further increasing the supply of affordable rented housing.
- d) It would encourage additional PRS investment into the provision of new affordable rented housing

It goes without saying that, should an exempt landlord break the conditions then the exempt tax becomes payable.

Trading businesses are eligible for Roll-over relief against CGT. PRS housing enterprises are not. If, for example, a landlord wishes to improve properties and the only way he can fund this is to sell one/some then he must pay 28% CGT on the gain in value of that property sold. In contrast roll-over relief for a trading business means the enterprise can invest 100% of the proceeds in improvements.

Our suggestion is that responsible landlords should be eligible for roll-over relief for reinvestment in their properties.

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

The Commission makes the mistake of trying to separate investment in new PRS from the wider subject. Prejudice against using the PRS as a means of delivery of affordable housing has resulted in wasteful use of public funding which could have been used to greater effect had the PRS been involved.

It should be noted that grants to PRS landlords for improvements and repairs have also disappeared.

Q.5. Do you agree with our suggestions for further action in the area of investment in housing?

Emphasis has been put on supporting the social sector to increase affordable housing stocks. The comments above demonstrate that this should be extended to the private sector as better value for money can be achieved and developments away from larger settlements can be enabled.



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

A LBTT reduction for low carbon properties could be a good incentive for those buying lower carbon properties. Council tax reliefs for owner occupiers (not for PRS) who reduce their carbon use or increase their energy efficiency could also work as a useful 'carrot'.

As a general rule, long term financial support is required rather than schemes which only last a short while or have no certain longevity. Works, particularly the often major works required in traditional properties, need to be carefully planned and budgeted and trades people need to be sourced which does not always happen quickly in more remote areas. This is discussed further at Q16.

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

Q.7. Do you agree with our assessment of the current position regarding housing and the economy? What more would you add?

Q.8. Do you agree with our assessment of the current situation of UK Government policy with regards to the housing market and the economy?

Q.9. What are your views about the five areas of policy reforms suggested here?

The Commission sets out six areas of policy reforms. We comment on some of these below:

Local and community initiatives are welcomed if they are professionally administrated. Initiatives can also be well delivered by private developers such as rural estate owners.

If Land Value Tax were to be introduced it would need to replace Council Tax, Business Rates and Stamp Duty. This is a possibility but prior to giving a firm view proposals would need to be developed and consulted upon.

We support the recommendations of RICS which should help to deliver more effective land for development.

A high quality private rental market is supported and further discussed in section 8.

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

Q.10. Do you agree with our assessment of the current position regarding housing and welfare benefits? What more would you add?

We are not sure what evidence there is to support the claim that housing benefit has contributed to the increase in house prices. We understand the lack of supply and the availability of loan finance to be the drivers.

There is a potential risk in the pipeline for housing benefit recipients. The Scottish Government's consultation on a new tenancy for the private sector does not include a provision to enforce the removal of a tenant at the need of the agreed tenancy period. As this will create more secure tenancies, only the tenant applicants with the cleanest of record including evidence of job and oncome stability and security will be offered leases. This will put the most vulnerable of tenancy applicants at risk of not being able to secure housing in the PRS.

Q.11. Do you agree with our assessment of the current situation of government policy at UK levels and the possible outcomes post-referendum? What more would you add?



Q.12. What are your views about the medium term policy options presented here? What other ideas and issues strike you over this time frame?

Q.13. 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?

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

Q.14. Do you agree with our assessment of the importance of housing to the environment?



It is important to retain traditional properties of character which enhance the local environment. These usually are of better original structure and are worth spending the money to bring up to current environmental standards.

Building at a high density may not be an ideal solution across the country. It is important to ensure policies are flexible as one approach is not suitable. Building low density housing which fits in well to existing settlements, particularly in rural areas, will have less of a negative social and environmental impact than a large new town on a greenfield site.

As identified in NPF3, rural dwellers will remain dependent on car use and measures must be pursued to lessen the environmental impact which will benefit both existing dwellers and well as new ones while not forming anti-rural development policy. There is a danger that blinkered vision on energy usage will see extension of existing trends towards disavouring rural development on the grounds that the transport element of energy use that results is unsustainable. Continuation of this sort of thinking will be hugely damaging to the rural economy. To encourage development of public transport and more innovative schemes such as car sharing using apps like UBER should help to ease the number of commuting cars and reduce rural travel energy. Cars are also becoming more fuel efficient and technology is enabling changes such as the rising popularity of electric and biogas vehicles.

Scottish Land & Estates supports the Commission's stance that new housing should be built to a 'right' standard so it will deliver housing supply for the long term. We have concerns though that the 'right' standards may lead to problems of poor air quality due to lack of ventilation, and structural damage due to poorly selected materials or installations techniques. This will shorten the lifespan of housing necessitating premature demolition or refurbishment. It also has a negative impact to the occupants' health with therefore general wellbeing.

Within an urban setting brownfield sites should be the first choice for developments rather than greenfield sites. We do, however, appreciate that brownfield sites come with burdens which can make new development more problematic and expensive. This includes aspects such as access and drainage. Care must also be taken in this objective not to create unintended outcomes. Any compulsory purchase powers must be clear to specify the circumstances under which the measure can be used. For example, using the phrase abandoned and derelict is not sufficient as it is not only problematic to define but it could also incorporate rural areas of land where there is a misunderstanding of the land use.

Developing microgeneration schemes should be encouraged at a household and community level. Scottish Land & Estates have seen this work well on member's estates. For example, the installation of district heating schemes is often successful due to the traditional layout of buildings on many estates. These schemes can work well because the owner has a long term interest and there is a clear business minded approach to the development, installation, maintenance, billing etc of the scheme. This could work well in non-estate communities but this will involve mixed tenures, and unclear roles and governance. Expanding Scottish Government funding into this area may not be the best use of public money. By ensuring more homes can avoid using the energy in the first place is a more welcome policy than encouraging a few houses to use renewable energy.

As for the need to demolish existing stock, it is often more economical to clear the site of poor housing and start again rather than try to work with what is there. The majority of the properties being demolished were built cheaply and lack quality, character and neighbourhood benefits. Although it may seem inefficient to remove structures, for the overall wellbeing and economic outlook in replacing such buildings must be considered.

Sites with poor housing should be treated as brownfield sites i.e. needing development. Buildings of character should be treated more sympathetically but there are many good examples where a derelict stone property has been replaced with a modern fit for purpose property which perhaps uses the local stone and colours so it sit well in the environment.



Commission on Housing & Wellbeing

Q.15. Do you agree with our brief assessment of current policy on housing in relation to the environment?

The review of current policy is not accurate. The Scottish Government has not 'secured legislation to require home owners to install energy efficiency measures'. The Energy Act in fact gives provision that Scottish Ministers MAY introduce measures to both private rented sector and owner occupiers.

The REEPS groups are undertaking a huge amount of work on this subject to report back to Scottish Government early 2015. Their report will be carefully considered and focused so the Commission should strive to take their lead and be aware not to undermine it.

Q.16. Do you agree with our suggestions for further action in the area of housing and the environment?



Medium Term

There is a need for funding options to have clarity and longevity in order to ensure owners are aware of what is available and have confidence they have time to plan and implement work. Longer term schemes will also give trades people confidence in training their existing staff or increasing staff resources as they can be sure the work will continue rather than experience the peaks and troughs which have been experienced as funding has come and gone in the past.

Increased support for energy efficiency works is required. With traditional, hard to treat properties costs are significantly higher and works often more disruptive. Any works must be carried out with the appropriate materials and with consideration to ventilation as well as insulation.

Scottish Land & Estates agrees home owners should also have a responsibility to improve the energy efficiency of their homes and how this is implemented is being carefully considered by the REEPS groups.

As previously discussed we support saving the fabric of buildings where economic or where the building is of age or character. However, where buildings have been poorly constructed originally or are beyond saving we support the redevelopment of the site in a sympathetic manner to the surrounding environment. VAT on repairs and improvements is an impediment to saving older buildings rather than going for a full redevelopment of a site. This was discussed in more detail in Q3.

We support the empty homes officers already in place and as they both increasing housing stock and can improve communities. We would like to see the current work extended.

Long Term

We support high standard of new housing which will allow them to meet housing need in the long term.

As addressed in Q14 micro and community generation projects can work well and should be supported but are not always easily or well implemented.

We support measures to release urban brownfield sites for development. The Commission should ensure the wording of any recommendation regarding this does not have unintended consequences for rural land.

Q.17. Do you have other suggestions that we have not mentioned in relation to housing and the environment?

Public money needs to be devoted to energy efficiency improvements (including ventilation). The benefits are not just for the occupants or the community but there is also a wider public benefit.

Section 6: Housing and Health and Education

Q.18. Do you agree with our on our assessment of the importance of housing to health and education?

Health

Scottish Land & Estates agree with the Commission's comments on housing and health.

We agree that worry and stress about housing is unhealthy. When related to Chapter 8, there is an underlying assumption that this bullet point refers to the PRS. Please see our comments on Chapter 8 with regards to the incorrect perception of insecurity in the PRS.

Although it does not detract from the health outcome, we would like to add that damp and mouldy houses can be triggered by energy efficiency works in traditional buildings and also by the occupants' misunderstanding of how to appropriately care for the home through ventilation and other behaviours such as not drying clothes indoors. Some of our members have reported finding more mould issues in renovated properties compared to un-renovated properties. There is a fine balance with moisture and if this is tipped by increasing air tightness it can lead to these issues. Public awareness of how to appropriately ventilate and heat homes should be raised.

Education

Scottish Land & Estates also agrees with the majority of the Commission's points on education and housing. We are again, however, dissatisfied with the assumptions regarding the PRS. This is fully explained in our comments regarding Chapter 8 but it must be stressed that landlords get no benefit from evicting good tenants and causing disruptions. There is always a good reason for tenants to be given notice and in most cases it is tenants who initiate the end of the tenancy. Insecurity is not listed as tenant's concerns when surveyed. The Scottish Government Review of the Private Rented Sector 2009 found only 1% of the third of tenants that had issues cited lack of security as the problem even when prompted by a tick list.

Q.19. Do you agree with our brief assessment of current policy on housing and health and education?

The assessment appears to be sound.



Q.20. Do you agree with our suggestions for further action in the area of housing and health and education?

The list of what could be done is agreeable but does not appear to address some of the issues discussed in the chapter such as fuel poverty, or a neighbourhood approach to tackling low life expectancy and high morbidity.

Q.21. Do you have other suggestions which we have not mentioned in relation to housing and health and education?

The consultation lists that there should be a programme for the social rented sector which allows for an increase in the number of larger houses. The PRS should not be excluded from this.

Section 7: Housing and Community Regeneration

Q.22. Do you agree with our on our assessment of the importance of community regeneration?

We agree community regeneration is important and that tackling the housing aspects alone is insufficient. We also agree the community in question must be fully involved in the process.

Q.23. Do you agree with our brief assessment of current policy on community regeneration?

1. We support further focus, direction and accountability for community regeneration.
2. We support a clear monitoring framework.
3. We do not have the experience of social housing partnerships but support working together to achieve aims.
4. We support the involvement of communities.



Q.24. Do you agree with our suggestions for further action in the area of community regeneration?

Q.25. Do you have other suggestions which we have not mentioned in relation to community regeneration?

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

Q.26. 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?



Commission on Housing & Wellbeing

Scottish Land & Estates agree that there should be a modernised private rented sector which delivers for both tenants and landlords.

We are disappointed the Commission has stated that conditions are worse in the PRS than other tenures. As shown in the Scottish Housing Condition Survey 2009 to 2011 satisfaction of tenants is higher in the private sector (95%) than in the social sector (84%).

We agree there is the need to attract investment to the PRS but this should not be restricted to institutional investment. Smaller investors such as those on private estates can make a real difference to vulnerable rural communities. In the drive to increase the number of PRS properties there is a risk that appropriate development addressing local as well as national issues is lost.

The Commission compare the Scottish system to other countries. Although it can be useful to look for successful examples of tenancy arrangements elsewhere, making a direct comparison is not helpful.

Scottish Land & Estates do not believe security of tenure is needed, wanted or will address the key problems and the unintended consequences could lead to reduced investment in the sector and the most vulnerable tenants struggling to be offered homes. Many tenants are staying for longer and the vast majority still more on their own accord. Crook et al carried out a survey for the Scottish Government (Review of the Private Sector 2009) which showed in only 11% cases had the tenancy been ended by the landlord. And the English Housing Survey of 2012-13 showed only 7% of tenancies were ended by the landlord. When considering that many of these will be due to property sales, need for landlord to live in the property etc., there is little evidence to show landlords are evicting tenants needlessly. To repeat a point made previously, the 2009 report also showed that just one third of 1% of PRS tenants cited lack of security as a problem even when prompted by a tick list of possible problems.

Q.27. Do you agree with our brief assessment of current policy on the private rented sector?



Commission on Housing & Wellbeing

Scottish Land & Estates believe there are some errors in the assessment.

The statement that virtually all PRS properties are let under SATs is not accurate. Although not up to date, the 2009 Scottish Government Review of the Private Rented Sector shows 50% of those surveyed had short assured tenancies. Other tenancies included assured, regulated, agricultural or verbal. Also, SATs have a minimum initial period of 6 months but many are let out for longer initial periods and the majority will stay for years, particularly in rural areas.

Kincardine Estate the average length that current tenants have been in occupation is 9.68 years (this does not account for people moving due to changing housing need) and on Haddo Estate it is 6.8 years which is distorted down as the estate has recently build affordable housing for rent.

Arneil Johnston, Dumfries and Galloway Rural Private Housing & Fuel Poverty Final Report 2004 stated 'households in (rural) private rented accommodation tend to be very stable with almost 30% being resident for more than 15 years'. In an urban setting it is generally assumed the average length of tenancy is 18 months'.

It is incorrect to summarise that units are let at market rent. Again, particularly in rural areas, properties are often let at below market rent. Scottish Homes Report 83, in 2000 reported that 'landowner landlords very commonly set lower rent levels for local people than charged to the wider market'.

Some of our members have carried out analysis on their current tenancies. 91% of 69 homes on Kincardine Estate are leased at affordable rent which is over four times as many affordable houses provided by the Local Authority (13) in the community. This is also seen across the Local Deeside Group of Estates (Finzean, Ballogie, Kincardine, Dinnet, MacRobert Trust, Mar and Invercauld) where on each estate between 60% and 100% of over 250 properties are leased at affordable rent.

Again, in this section the Commission mentions institutional investment. We support innovative funding partnerships and structures but hope consideration to the encouragement of small and rural developments is also given.

The Commission has also failed to recognise the current Scottish Government Consultation regarding a new tenancy.

Q.28. Do you agree with our suggestions for further action in the private rented sector?



Scottish Land & Estates has the following comments to make on the proposed suggestions for further action.

1. Replacing the current arrangements for landlord registration and HMOs is supported. Targeting resources where there are known problems such as anti-social behaviour is an efficient approach and will reduce the burden on professional landlords managing their properties well. However, the consequences of lost revenue into Local Authorities need to be considered. Landlord registration income is enabling landlord forums and advice which may otherwise be lost. By having all private landlords registered also allows for an opportunity to expand the data collected which can inform policy as discussed in Q29. The Scottish Government Areas of Enhanced Enforcement consultation is supported and should help to address the issues the Commission identifies.
2. We support the introduction of a new tenancy which is simpler and therefore better understood by landlords, tenants and agents. We do not support unlimited security of tenure. Our response to the Scottish Government consultation covers this but to lose the right to enforce the end of the tenancy at the end of the agreed initial period will reduce investment into the sector as money will be diverted to less risky endeavours, and result in landlords having to be particularly fussy about the tenants they rent to, putting the most vulnerable at risk of not being granted private housing. There is also no evidence suggesting tenants need extra security. There is a need for a system which requires longer notice periods to be given to those who have been in occupation for longer and the landlord must have the reassurance that the tenancy can be ended quickly (but with respect to notice periods) and cheaply should this be necessary.
3. We support that actions should be taken to encourage further investment in the sector but although 'institutional investment' is not defined, we feel investment encouragement should not be limited to this. For example, the pilot Rural Homes for Rent Scheme has been particularly effective at delivering new homes to rural areas at a lower price than could be delivered in the social sector. The rapid growth in the PRS in the recent years is good evidence that the sector can grow through other means than 'institutional investors'. Policies to achieve PRS growth must not be aimed solely as institutional investors. There are a huge number of private landlords that could participate further were the government to introduce policies that would nurture the sector and remove fiscal barriers that prevent it from growing and indeed threaten its future. New funding models, partnerships and initiatives are worth exploring.
4. We are not best placed to comment on how housing associations should develop but evidence shows RSLs have received significant subsidies to date, while the PRS has not. The PRS landlords should be encouraged to participate further.
5. We do not support any rent controls apart from perhaps a limit to annual rent increases. The Commission provide no details on what they consider may be appropriate but it would be damaging to the sector and a breach of ECHR to introduce an upper limit on rent increases. When rent controls were previously in place it led to the depreciation of housing standards. We appreciate there are certain hotspots where rents are becoming unaffordable. The creation of more units should ease this naturally.



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

An opportunity exists to collect robust data from the PRS using the landlord's register. The information currently gathered, at a cost to the landlords, is of little use or benefit to policy making.

We would recommend an information gathering system as part of the landlord registration process. This would require improvements to the computer system but if useful facts such as rent, length of tenancy, length of occupation, costs of repairs and improvements etc. were gathered it would be worth time and expenditure. Policy is currently formed on misconceptions about the PRS and this robust data will inform and guide decisions from a factual basis.

The presence of a chapter on the PRS seems inconsistent compared to the previous chapters which take a wide view on how housing relates to wellbeing issues. Scottish Land & Estates has concerns that the Commission have based section 8 on preconceived ideas or agendas rather than fact.



Commission on Housing & Wellbeing

Q30. Do you have any further comments in relation to the Commission on Housing and Wellbeing's consultation paper?