



Housing in Scotland

**Current Context  
and Preparing  
for the Future**

July 2023



**solace**  
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SCOTLAND  
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# Background and Summary

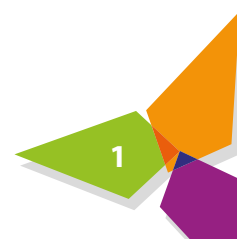
1. As set out in Housing to 2040, housing has a vital role to play in meeting many of the Scottish Government ambitions for Scotland, including eradicating child poverty and homelessness, ending fuel poverty, tackling climate change and promoting inclusive growth. As well as an upstream determinant of key outcomes, the right to housing is a human right and providing this right to everyone in Scotland should be of the highest priority.
2. Local Authority (LA) housing and homelessness services are, however, experiencing unsustainable pressure reflecting the critical lack of capacity in local housing systems in Scotland. Some local authorities are unable to meet their statutory duties, resulting in households in housing need being failed by the system setup to support them. The housing reality in Scotland is that there are simply not enough social and affordable homes available and local authorities currently have inadequate means to reverse this position.
3. The additional demands and pressures associated with a wide range of humanitarian programmes, most recently including the Homes for Ukraine and Scotland Super Sponsor Schemes, have further exposed and exacerbated the criticality of the position across Scotland. Existing domestic housing pressures associated with homelessness and general housing need, humanitarian programmes and widening refugee populations have been amplified. Further changes in the private rented sector have also acted to further limit access to affordable housing. It is clear that a fundamental review of homelessness services and social housing provision in Scotland is required.
4. The Society of Local Authority Chief Executives and Senior Managers (Solace) Scotland, reflecting concerns that current policy responses remain siloed and have a short-term focus, has undertaken to pull together relevant data from all of Scotland's 32 Local Authorities (LAs) to produce a holistic assessment of housing need in Scotland. This work has been undertaken with input from colleagues from the Association of Local Authority Chief Housing Officers (ALACHO) and the Convention of Scottish Local Authorities (COSLA).
5. The following report lays out the major housing and humanitarian challenges facing Scotland and the chronic housing shortages afflicting many areas of the country. It will analyse the data that has been collected and detail the wider strategic housing challenges facing Scotland, the barriers that local authorities are facing when it comes to the supply of new homes, as well as the opportunities and missed opportunities by not rapidly increasing the supply of new homes in Scotland. It will highlight important context to the challenges we face, make the case for house building in Scotland to be increased at pace and scale, and make recommendations on both short-term temporary measures needed to address the acute crisis as well as medium/long term measures that local authorities require of national government to help address the housing crisis more sustainably.
6. Local government housing practitioners have been engaging with Scottish Government colleagues on these issues for decades; the challenges and barriers illustrated in this report are not new. We have a housing emergency, what we need is an emergency response that acknowledges the urgency required and that makes a genuine difference to our collective ability to respond to the unprecedented challenges.
7. Responding to the housing crisis is everyone's business and as public sector leaders we have a collective responsibility to work collegiately across local and central government to use all the levers at our disposal to address the crisis.

## Key issues that require addressing

- ▲ An emerging crisis of affordability across the whole housing system but particularly in rural, island and east central Scotland;
- ▲ Record and rising numbers in temporary accommodation across most Councils, and increasing numbers of open cases and time spent in temporary accommodation;
- ▲ The cumulative impact of a wide range of humanitarian and asylum seeker programmes which would benefit from improved planning and coordination;
- ▲ Continuing shortfall in the supply of mainstream social housing lets;
- ▲ Emerging issue with a shrinking private rented sector (PRS) and withdrawal of proposed investment in build to rent (BTR), creating further demand for social housing;
- ▲ Evidence of the limited impact and unintended consequences of emergency legislation;
- ▲ An emerging risk of a significant slow-down and underspend in the Affordable Housing Supply Programme (AHSP);
- ▲ Emerging issues with the implementation of the removal of local connection;
- ▲ The risk of the collapse of the licencing of short term lets following the recent High Court decision on the City of Edinburgh's scheme.

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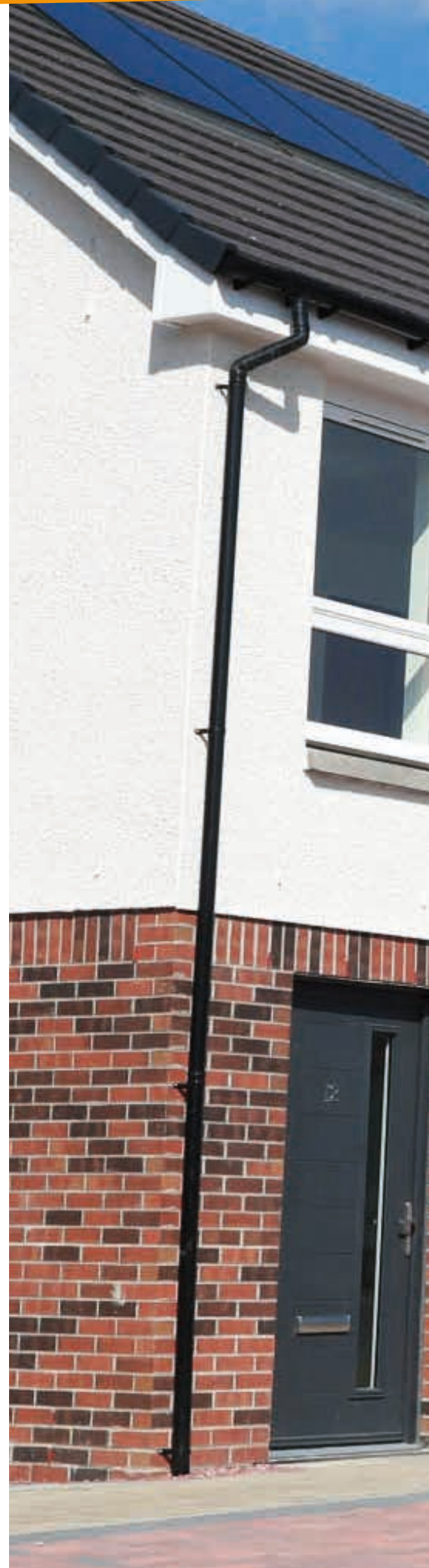
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# 1 Methodology

8. The appended spreadsheet (appendix 1) details the data that has been collected as part of this exercise. Data detailing domestic housing pressures was collected by ALACHO by issuing a pro forma to the Chief Executives and Chief Housing Officers within each LA to provide an evidence-based overview of the housing pressures facing local authorities and partner Housing Associations where a LA has no housing stock or has a common housing register.

9. A mixed methods research design was adopted, where LAs were asked to provide both quantitative data on areas including number of homeless applications in the current year, shortfall in property lets available, number of social rented properties, number of unsuitable accommodation orders breached per week and data on the affordable homes supply programme. An opportunity for qualitative narrative was also provided to gain a deeper understanding of the individual circumstances of each authority. Data was provided by all 32 local authorities however we note there are small gaps in the returns from a few authorities, reflective of the accessing data held by RSL colleagues and available capacity.







## Housing need in 2023

**10.** The right to adequate housing is recognised in the 1948 Universal Declaration of Human Rights and in the 1966 International Covenant on Economic, Social and Culture Rights. What denotes 'adequate' has been defined as living in security, peace and dignity encompassing security of tenure, habitability, availability of services, affordability, accessibility, cultural adequacy and location<sup>1</sup>.

**11.** This right would be enshrined in Scots law as part of the proposed new Human Rights Bill and the Scottish Government's ambitions to advance human rights and reduce inequalities are referenced in Housing to 2040, however there has so far been little discussion on how the international right to adequate housing might be translated into housing policy and practice. A report published by ALACHO in 2020 demonstrated that our data sets are too poor to properly assess performance against the human right to housing, but what data we do have suggests that as many as 500,000 households may be living in homes that fail to meet their human rights on two or more counts<sup>2</sup>. Our housing system is failing to deliver on our central policy ambitions and our human rights obligations. In the current context, put simply, Scotland is not in a position to provide a home to all citizens that need one and we are therefore dishearteningly out of reach of implementing the human right to adequate housing.

**12.** The following paragraphs will illustrate the demand for housing in Scotland, drawing on the data that we have collected from Local Authorities. However we must also be aware that there is a significant unmet demand for housing as demonstrated by the waiting lists for social housing which for 2021 (the most recent available official figure from the Scottish Housing Regulator) stood at 144,881 (178,260 including transfers)<sup>3</sup>. This figure does not include LAs that do not own their housing stock (Glasgow City, Argyll and Bute, Inverclyde, Dumfries and Galloway Council, Comhairle nan Eilean Siar and the Scottish Borders Council). Glasgow's Housing Associations alone have around 64,500 people on their waiting lists, equivalent to 10 applications per property let<sup>4</sup>. Our data collection suggests that the overall figure has risen to 243,603 (including the transfer list).

**13.** It is also pertinent to highlight the interdependencies between the different types of housing tenure and how these influence demand for social housing. One of the main drivers of social rented housing demand is private sector market failure. If people could afford to buy a house or pay a PRS rent, many would not want a Council house. Unaffordability of other tenures drives up demand in the social rented sector therefore national policy needs to focus much more closely on the interrelationships between tenures and focus on measures that will help low/middle income households to afford other tenures.

**14.** The following sections will outline the primary sources of demand for local authority housing. In addition, there is also demand from:

- ▲ Care experienced people in Throughcare and Aftercare;
- ▲ Health and Social Care Partnerships (HSCPs) and Children's Services (eg Kinship carers and Foster carers);
- ▲ Veterans, while largely captured in homelessness figures, have specific needs requiring a bespoke approach and represent a group with a high priority for housing;
- ▲ A shortfall in the supply and quality of accommodation suitable for the Gypsy/Traveller community;
- ▲ An emerging demand from those eligible for early release from prison stemming from the anticipated extension of the emergency legislation linked to the SHORE Standards and the wider use of Home Detention Curfew;
- ▲ An identified group of adults with learning disabilities in hospital long term or placed in unsuitable out of area accommodation for want of appropriate local housing and sustainable care and support.

<sup>1</sup> Office of the High Commissioner on Human Rights [www.ohchr.org/en/special-procedures/sr-housing/human-right-adequate-housing](http://www.ohchr.org/en/special-procedures/sr-housing/human-right-adequate-housing)

<sup>2</sup> <http://alacho.org/what-we-do/reports/>

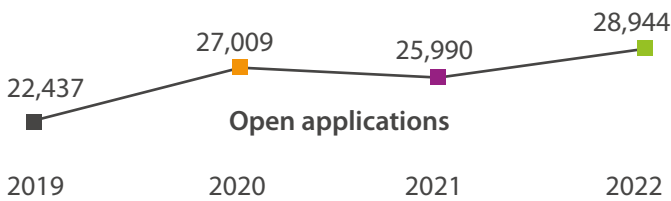
<sup>3</sup> <https://statistics.gov.scot/data/housing-lists>

<sup>4</sup> Glasgow City Council Draft Housing Strategy 2023 to 2028

# Homelessness

**15.** Homeless presentations are at an all-time high, with 28,944 open applications to end of September 2022, as a result of the impact from COVID19 and cost of living crisis<sup>5</sup>. Despite progress in implementing the joint COSLA/Scottish Government action plan “Ending Homelessness Together” including the widespread adoption of Housing First, improvements in accessing the private rented sector and in meeting the needs of care experienced young people, an increase in homelessness presentations is putting additional pressure on local authority homelessness and housing services. In a recent survey of all 32 Councils, 9 identified themselves as being unable to meet their statutory obligations to provide suitable temporary accommodation and regularly breaching the terms of the unsuitable accommodation order (UAO). The risk of more and more local authorities not being able to meet their statutory homelessness duties is becoming a reality and there is little or no means to reverse this position.

**Open homelessness applications are at an all-time high**  
Open homelessness applications, as at 30 September



**16.** The length of time a household spent in temporary accommodation was on average 207 days in 2021/22<sup>6</sup>. The availability of the housing options available for households including social housing, the private rented sector, home ownership or specialised options like Housing First all affect how easily and quickly it is for households to move on from temporary accommodation and homelessness into a settled home.

**17.** Homeless applications are highest in the urban cities of Edinburgh (3347 homeless applications to date in 2022/23) and Glasgow (4595) but increasingly in surrounding LAs such as Fife (2610), South Lanarkshire (2302) and North Lanarkshire (1896). The top three by head of population are West Dunbartonshire, Glasgow and Clackmannanshire (all over 1000 applications per 100,000 of population) followed by North Ayrshire and Dundee. The areas with the lowest level of presentations by population are Aberdeenshire, Angus, East Renfrewshire, Perth and Kinross and Inverclyde. More focus needs to be put on understanding why these figures vary in the way that they do; if we are better informed, we will be better placed to reduce homelessness.

**Shortfall in property lets available 22/23**  
(Figures based on LA's data returns)

No. of homeless applications to date 22/23 (as at 23/03/2023)	No of people on the Housing Waiting list	No of annual allocations	No of Households Assessed with housing need
37,793	243,603	26,102	96,555

**18.** As highlighted above, the number of homes allocated to households in housing need is completely insufficient to provide a move on option for most households. Local authorities allocate between 33% to 64% of social rent homes to homeless households.

**19.** Our collective response to homelessness and the housing crisis needs to be more streamlined between central and local government, with aligned work streams which includes Local Authority practitioners. To date nearly all workstreams to respond to homelessness have included third sector and independent organisations with little to no representation from across LAs; early and genuine inclusion of councils in these conversations is vital.

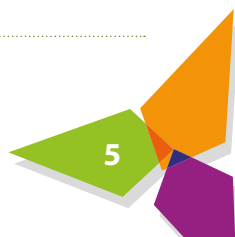
**20.** Local Government are clear that early intervention and prevention is key if we are to find a long term, sustainable solution to homelessness. That said, the new proposed Prevention duties which will extend the definition of threatened with homelessness to 6 months and make LAs responsible for ensuring a suitable and sustainable outcome is achieved will likely compound the challenges and place further pressure on existing limited stock. At this time, we suggest a temporary pause on the introduction of the new duty.

**21.** It is our assessment that a longer term view to tackling homelessness is required, with at least a 10 year plan for whole system transformation including more formal roles for key partners such as health and social care, the formalising of the role of IJBs in delivering Rapid Rehousing Transition Plans (RRTPs) and support on the proposal to introduce a prevention duty.

**22.** A review of the legislation, guidance and regulatory expectation to ensure that all RSLs provide an appropriate level of support to councils in meeting the housing needs of homeless applications would also be a welcome development. We do recognise, however, that many RSLs are already strong partners in delivering a housing option for homeless households.

<sup>5</sup> Scottish Government National Statistics. Homelessness in Scotland: Update to 30 September 2022

<sup>6</sup> Homelessness in Scotland 2021-22 ([www.gov.scot](http://www.gov.scot))





## Humanitarian Protection Schemes

**23.** Data collated by COSLA illustrates how Humanitarian Protection schemes are placing an increased demand on housing, which is a significant change to participation in schemes prior to COVID.

## Asylum Seekers

**24.** Up until 2022 asylum dispersal only impacted Glasgow but with the increase in the number of asylum seekers arriving into the UK, the impact of COVID, and a slow-down in asylum decision making, the UK Government has increased the number of contingency accommodation sites across the UK, including in Scotland. These have been hotels to date, but they are currently exploring the use of larger sites and vessels across the UK. In April 2022, the Minister for Immigration informed all local authorities in the UK that the contracted accommodation providers can now procure properties in any local authority area for asylum dispersal.

**25.** The Home office have allocated a proportional share of beds to each 'region', Scotland being allocated 9000 beds in the first instance. At the time the plans were produced, over 5000 asylum seekers were accommodated in Glasgow and the Home Office contractors, Mears, are seeking to procure c. 2,000 beds for asylum seekers in Scotland during this calendar year, with all councils required to support this work on a proportionate basis. Mears are looking to lease from private landlords, purchase properties and work with Registered Social Landlords (RSLs) and local authorities to identify properties that aren't being utilised for other purposes; this creates a situation where different areas of government are competing in the same market for finite resources. It is important to note that while Mears' brief covers all of Scotland, and the agreed approach is that accommodation is sought on a proportionate basis across the whole of Scotland, in reality they are focusing on around a dozen areas so the competition will be focused on these LAs at present. Dispersal must be proportionate so that certain parts of the country are not unduly impacted and a genuine and transparent commitment to this is required of the Home Office and Mears.

**26.** Though local authorities are not required to identify the properties, local authorities are expected to work with Mears to support their procurement process, but also when asylum seekers living in the dispersal properties receive a positive decision, they have a right to access housing (in a local authority of their choosing) as would anyone else in Scotland. In addition, there are currently 12 contingency hotels in use across the country (with further hotels and accommodation in the pipeline) and there is of course an impact on services to support these sites. People receiving positive decisions in contingency accommodation will also have a right to access housing within Scotland.

**27.** A broad Place Based approach is needed to consider local demographics and other pressures in each area in turn. When invariably a number of applications are refused by the Home Office, individuals are subject to eviction from their Mears property. Some will be eligible for council assistance if they have care needs or dependents but otherwise will be destitute in Scottish towns and cities without resource to public funds. While they are subject to removal from the UK, often this does not happen.

**28.** In the last few months, the Home Office has established a new streamlined asylum decisions making process to address the significant backlog of cases that have built up over the last few years. This means that in the next few months we are likely to see a significant number of people granted asylum. While this is clearly a positive development for individuals and families who have been awaiting a decision on their claims for a very long time, this is likely to have a significant impact on local authority homeless services in a short space of time.

**29.** Glasgow City Council have already seen a significant increase in the number of households in temporary accommodation over the past few months, largely driven by this new streamlined process. Figures show that between 24 April 2023 and 22 May 2023, 226 households were given positive asylum decisions and were provided with temporary hotel or B&B homelessness accommodation in Glasgow.

## Unaccompanied Asylum Seeking Children (UASC)

**30.** In 2021 the UK Government mandated all local authorities to provide placements for Unaccompanied Asylum Seeking Children (UASC) (65 of every 652 children entering the UK will be placed in Scotland). This is a significant rise in the number of children needing accommodation from the day of arrival and potentially until they are 26 years of age. Most young people arriving are over 15 years old and therefore supported models of accommodation are often the most appropriate. This places a further pressure on housing supply for local authorities.





## Afghan and other Resettlement Schemes

**31.** Currently there are a number of schemes that support Afghan refugees. Local authorities prior to the Ukraine crisis offered a number of properties to people fleeing Afghanistan, however due to the nature of the evacuation most Afghans have been living in Home Office hotels for a significant amount of time. Across the UK there are approximately 7000 Afghans living in hotels with approximately 300 Afghan refugees in hotels in Scotland who are entitled to housing in Scotland. The Home Office has issued notices to quit to all Afghans in hotels which requires everyone to vacate hotels by August. This presents particular challenges for LAs that host a hotel (Aberdeen City, Edinburgh and Fife), but also to areas where there are existing Afghan communities and people will migrate towards. Though families are being encouraged through UK Government policy to find their own private rented accommodation, this is proving very difficult for families in a fast moving and increasingly expensive market, and therefore the likelihood of local authorities seeing homeless presentations or needing to provide accommodation for families is high. There is also a significant challenge due to the size of many of the families in hotels and the properties to accommodate these families do not exist.

**32.** In addition, there will be an ongoing need to house Afghan refugees currently outside of the UK, through the schemes set up by the UK Government, for those who have fled Afghanistan but are in third countries such as Pakistan. Local authorities have indicated that if possible they would wish to continue to participate in these humanitarian efforts and people arriving will gain protection and have the same housing rights and entitlements as others in Scotland.

Similarly, there is an ongoing ask for councils to participate in the broader UK Resettlement Scheme for refugees. Although numbers arriving through this scheme are currently lower than for the Afghan and Ukraine schemes there is still a need to provide protection to these people.

## Ukraine

**33.** In 2022 the UK Government established the Homes for Ukraine Scheme and the Scottish Government established the Super Sponsorship Scheme for Ukrainians fleeing the war. There are around 24,500 displaced people in Scotland through these schemes as of May 2023. This is a scale of humanitarian protection work and resettlement we have never seen in Scotland before. According to national statistics, around 12,000 Ukrainians are currently in temporary or short-term accommodation. Of those, circa 7,500 arrivals are with host families along with circa 4,000 in emergency accommodation, consisting of hotels and a cruise ship. At the end of March 2023, accommodation provision on a vessel docked in Glasgow ended, while provision on the remaining ship in Edinburgh is due to end in July. While we acknowledge that the use of emergency accommodation in hotels and on cruise ships for Ukrainians was done so due to the scale of arrivals over a very short period of time, it is pertinent to note that these 'housing' solutions would not meet the government's own definition of suitable accommodation and would universally breach the unsuitable accommodation orders that Councils are held to. The Super Sponsor scheme should not reopen until such time that central government is in a position to offer welcome accommodation that meets the UAO.

**34.** Ukrainians have also been arriving into the UK on family visas, which allowed people to join family members already living in the UK. Though many families were able to accommodate arrivals for a short period, we have seen families having to present as homeless or having to find their own accommodation due to the impracticalities of people living together for significant lengths of time. While the Sponsor scheme has been paused, this route of bringing family members to Scotland on family visas is still available and causing additional pressure on housing, health, education and other services. Hosting arrangements are increasingly starting to breakdown which will further compound the challenges in regard to housing Ukrainians.

**35.** It should also be noted that there are 12,799 visas (as of 29/05/23) issued under the Ukraine Super Sponsor Scheme that represent individuals who have not yet presented in Scotland for support. Individuals have up to 3 years to travel from the date of the visa being issued which could present further challenges to LAs housing provision.



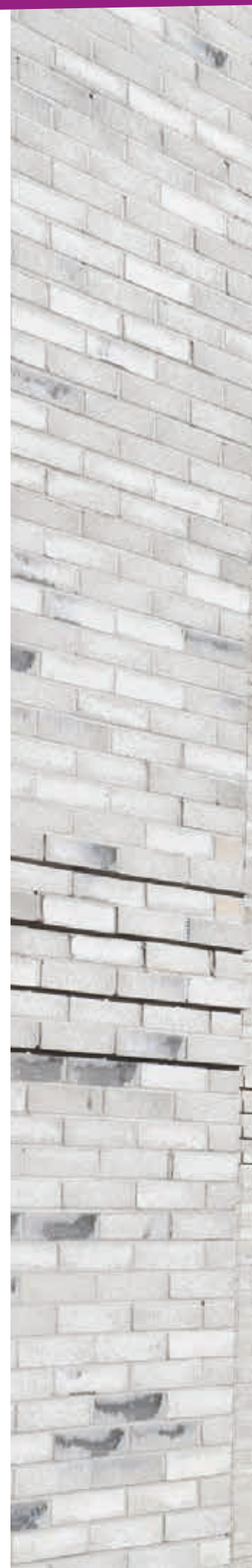
## Temporary Accommodation and Breaches of Unsuitable Accommodation Orders

**36.** The use of bed and breakfasts is increasing across most of Scotland, when households need immediate accommodation. Several LAs who have not had to use bed and breakfast in the past are now using them which is increasing the risk of breaches of the unsuitable accommodation order. Local Authorities including Dumfries and Galloway, South Lanarkshire, Dundee City, Highland, and South Ayrshire have told us that it is only in recent months that they have needed to rely on B&B accommodation where it was a rarity in the past. In Orkney, the number of households in temporary accommodation has increased 150% since the start of the pandemic and if households who have chosen to stay temporarily with family and friends are included, it is closer to double the level of pre pandemic. This exemplifies the precarious position that LAs are in and that in a relatively short amount of time, the housing pressures they are under are coming under even further strain. This illustrates the urgent need to implement the 15 recommendations made by the Temporary Housing Task and Finish Group, including funding and guidance to develop and implement recommendations and ensure a consistent approach across LAs.

**37.** Currently for most local authorities the number of breaches of the unsuitable accommodation order are low, however there are several local authorities where breaches are significantly higher:

Name of Local Authority	Temporary Accommodation	
	Bed & Breakfast - Average use per night (spaces)	Breaches of Unsuitable Accommodation Orders per Week
City of Edinburgh Council	1243	986
Glasgow City Council	730	600
Fife Council	71	43
West Lothian Council	154	14

**38.** Households are also making complaints to elected members, MPs and MSPs, regarding their dissatisfaction with the homeless services provided by local authorities and waiting times for households in temporary accommodation to be offered a home. COVID has changed expectations, with hostel accommodation no longer acceptable. One local authority stated they were seeing higher refusals for hostel accommodation as households desire dispersed accommodation.







# 2 Demand

**39.** Based on data provided, it is evident services are under unsustainable pressure, with no prospect of relief in the form of reduced demand coming anytime soon, in fact the outlook looks even harder. The numbers of homeless households assessed with a housing need is approximately 96,555, yet the number of annual allocations made is massively insufficient at approx. 26,102.

**40.** Local Government would welcome a temporary revision to the Unsuitable Accommodation Order to allow the use of Bed and Breakfast accommodation for longer than 7 days – similar to the revision made during the pandemic. This would reflect the crisis situation that we are currently in. If this is deemed not possible, the Scottish Government must work with independent advocacies such as Shelter and CLAO to discourage the active seeking of financial damages for breaches of the UAO where applicants have protected characteristics. LAs are settling applications for Judicial Review outwith court to minimise court costs however there remain costs attached to this which are further diminishing chronically overstretched homeless budgets. At the very least, central government could seek to monitor how much cost is being incurred and in defending/reacting to Judicial Reviews by each LA.

## Removal of Local Connection

**41.** The removal of the local connection legislation in November 2022 has seen small numbers of households choosing to present to local authorities where they have no connection. Presentations primarily come from Scottish households but there have been 1 or 2 cases of households presenting to Scottish LAs from England. The small numbers should be taken with the caveat that the change in legislation only came into effect in November 2022 and does not appear to have been publicly or widely communicated to service users by central Government. There is, however, anecdotal evidence of English authorities suggesting Scotland as a destination for local applicants as a means to reduce their own pressures.

**42.** The following case studies demonstrate some of the challenges and concerns in regard to the removal of local connection.

### Case 1

There have been 1 or 2 cases of households presenting to local authorities, who require care packages to be transferred or specific properties that the local authority cannot easily or quickly accommodate for the household.

### Case 2

A male presented as homeless, stating he was sofa surfing, he was in his home local authority area and wanted to move to our local authority as he had friends here (though he was vague when asked for details and was not necessarily concerned about being housed near them, which is unusual given the geographical nature of our LA). I was considering placement but it was quite late at night and he was struggling to get to our local authority area, so we agreed that he would call in the morning. If he had made his way prior to calling I would have placed him and had no knowledge of the risks. If he had been local, it is likely our system would have flagged he was subject to MAPPAs.

The duty officer spoke with him the next day, he confirmed no issues that we needed to be aware of and he answered no to Registered Sexual Offender questions.

*“I was in a meeting with someone from the home local authority the next day and they checked their system and discovered that he was subject to MAPPAs. If this hadn’t happened we would have placed him into temporary accommodation without an Environmental Risk Assessment.*

*In the end he didn’t continue with a homeless application but he did directly contact our RSLs, failed to disclose his RSO status again and was given a property. An ERA was completed after he had been awarded a tenancy and the property was deemed unsuitable. The case is still ongoing and we are trying to work with housing providers to find a more suitable housing solution.”*



**43.** There is concern for households having multiple open homeless cases across the different LAs and lack of a joined-up approach to ensure limited LA resources are used efficiently to ensure that those in housing need can be accommodated in temporary housing and assisted to move on to permanent accommodation.

**44.** Some authorities are facing greater pressure from the removal of local connection than others, thus intensifying pressures in existing hotspots for housing demand. The removal of local connection is also resulting in applicants who have exhausted accommodation options in one area to move on to another; these applicants can often have behavioural issues which negatively impact on staff and vulnerable applicants. The local authorities who have seen the most presentations from households who before November 2022 would have had no local connection are:

Name of Local Authority	Total Homeless Applications from out with your LA
North Ayrshire Council	157
Glasgow City Council	113
South Lanarkshire Council	63
City of Edinburgh Council	41
South Ayrshire Council	40
Renfrewshire Council	32

**45.** We know that refugees who have no significant connection to the place of their temporary accommodation are more likely to move to places where they have connections or there are existing communities. We can therefore anticipate that some areas are likely to see an increase of people who arrived via humanitarian protection programmes not remaining in the local authority area they were originally based. This is a particular concern for Glasgow and Edinburgh.

**46.** Consideration must also be given as to how the proposed new Prevention duties will be impacted by the removal of local connection. How can an LA prevent homelessness from applicants from another area where they have no jurisdiction or locus? Local connection diminishes already the potential impact of Prevention duties and we must collectively consider how this will be recorded once a duty is agreed.

## Demand in Rural and Island Authorities

47. Arguably, much of the discussion on the housing crisis, homelessness and the demand for housing has focused on cities and LAs in the east of Scotland where the numbers involved are highest, however the sustainability of housing provision in rural and island authorities is also an urgent concern and cannot be forgotten. Rural and Island authorities experience unique challenges including:

- ▲ **Higher costs of building**  
In excess of £300,000 per unit compared to a national average of £200,000. In the future this will be higher due to emissions legislation.
- ▲ **The purchasing of second homes by non-residents and properties for tourism**  
The Scottish average of properties owned as second homes is 0.9% however is as high as 6% in rural authorities. Competition for second homes in popular rural locations prices locals out of the housing market, diverting more pressure to the social rented sector. Once some time has elapsed following the introduction of the short term lets legislation, there will be an ability to determine whether this has assisted with the number of properties available for permanent occupation.
- ▲ **A comparatively low amount of rented stock**  
The PRS is not nearly as active in rural and island authorities as it is in urban councils and their surrounding areas, which further contributes to demand for council housing. In addition, smaller rural and island authorities that have a small HRA can lack the economies of scale of larger organisations and accordingly are faced with little choice but to increase social rent charges, which leads to island authorities such as Orkney having some of the highest social rented housing in Scotland.
- ▲ **An aging population**  
There is an older demographic in rural and island authorities who can have greater housing needs that are more complex. The percentage of over 65s in authorities such as Moray (22.3%), Comhairle nan Eilean Siar (26.5%) and Highland (23.2%) is higher than urban authorities such as Glasgow (13.6%), Edinburgh (15.4) and Dundee (17.8%)
- ▲ **Little speculative private house building outwith main residential areas**  
For example, in Argyll and Bute, excluding Helensburgh and Lomond, the rate of private house completions on sites of 5 or more over the last 5 years is only 16.8% of what would be expected for the size of population in Scotland.
- ▲ **Lack of accommodation stifling employment and economic growth**  
With properties at a premium, businesses can struggle to recruit workers due to lack of affordable housing, thus impacting local employability and the local economy. For example, a 2022 survey found that the majority of employers on Mull and Iona think lack of worker accommodation is a problem, impacting negatively on current operations and stifling growth and investment. Lack of affordable housing is impacting on the ability of rural businesses to set up or expand, inhibiting vital economic development.





**48.** Housing needs in Scotland are met through several means, as this report will now go on to describe. We should also be cognisant of owner occupier which represents the most common form of residential occupancy in Scotland, with varying levels from 82% in East Renfrewshire, to 44% in Glasgow City<sup>7</sup>. The choice and ability for people to purchase their own home, however, is becoming increasingly untenable due to high house prices, high mortgage rates, stagnating wages that aren't keeping pace with inflation and high rents (particularly in certain areas of the country) impeding the ability to save for a deposit. The inaccessibility of owning property at present will at best maintain and increase demand on the PRS and at worse, push more people to social housing wait list, making it an issue pertinent to these discussions.

## Private Rented Sector (PRS)

**49.** The private rented sector is one of the housing options for those in housing need. While just 4% of homeless applicants gets settled accommodation in the PRS, it is a main outcome for many on lower incomes who do not apply for social housing or are not housed through the homelessness route. As such it attracts a wide demographic of households, such as students and key workers. The PRS provides housing for around 340,000 households across Scotland but demand is outstripping supply and creating a competitive lettings market<sup>8</sup>.

**50.** The level of demand for social housing and private rented sector homes far outstrips availability in most areas. Private landlords are inundated with offers for properties, able to let their properties in a just a few weeks and in some instances without the need to advertise the property as they have waiting lists of potential tenants. For a certain number of private landlords, changes to taxation and the implementation of the rent cap for the PRS at 3% annual rent increases, has resulted in private landlords choosing to leave their properties void or selling the property to exit the market, reducing the capacity of the PRS in certain areas of Scotland.

**51.** Despite improvements in regulation, elements of the sector remain closely associated with serious and organised crime including money laundering, drugs, human trafficking, and modern slavery. A small number of unscrupulous individuals continue to evade regulation and deny tenants their rights whilst more generally the sector has a weak focus on customer service. The PRS, and the legislation is dominated by a focus on property rights rather than customer rights or trading standards. To this extent tenants are in a relatively weak bargaining position. There are examples of poor quality and badly maintained properties and the denial of rights by a proportion of the sector. Only half of the sector is managed through a letting agent, solicitor or other qualified professional.

**52.** Discussions with key representatives from the private rented sector have set out the scale of the issue across Scotland. City Lets Q1 2023 report states average number of days to let a property in Scotland is 21 days. Letting agents and landlords are inundated with enquiries for properties, so much so that some are operating waiting lists which means not all properties are not being advertised. Note that the table below indicates advertised rents however we have no reliable data on what is actually being paid.



<sup>7</sup> [www.gov.scot/publications/housing-statistics-2020-2021-key-trends-summary/pages/6/](http://www.gov.scot/publications/housing-statistics-2020-2021-key-trends-summary/pages/6/)

<sup>8</sup> [www.gov.scot/publications/private-sector-rent-statistics-scotland-2010-2022/pages/11/](http://www.gov.scot/publications/private-sector-rent-statistics-scotland-2010-2022/pages/11/)



### Market Overview – Q1 23

Beds	Average Rent	Rent Change 1yr	Rent Change 5yrs	Rent Changes 10yrs	Av. TTL (days)	TTL nChange YoY	Let within a week	Let within a month
1 bed	£710	9.9%	25.7%	45.2%	16	-2	41%	83%
2 bed	£964	13.8%	37.1%	54.2%	21	1	31%	76%
3 bed	£1,252	9.4%	26.3%	47.1%	26	3	24%	68%
4 bed	£1,742	6.2%	9.9%	39.4%	37	12	21%	55%
All	£1,007	12.4%	29.1%	49.2%	21	1	33%	76%

**53.** Even with such a buoyant PRS, the sector is shrinking. As stated above, for some private landlords, changes to taxation and legislation such as rent caps has made them reassess their need to be a landlord, others who have no mortgage are choosing to mothball their properties to avoid the risk of large debts for unpaid rents by tenants. This is all bad news for those who rely on PRS for a home and will result in more households needing housing support from local authorities. Full cognisance of the long-term impacts of additional requirements on private landlords needs to be prioritised, balancing these with benefits to tenants' rights. At the present time, we recommend a lifting of the Cost of Living (Tenant Protection) Scotland Act emergency legislation; the evidence demonstrates that it has not achieved what it set out to do and instead is impacting on investment as well as wider relations with the PRS and BTR sectors.

**54.** A key consideration will be to establish whether the early signs of landlords leaving the sector signal a longer term reduction in the contribution of the PRS in meeting housing need and preventing homelessness.

**55.** From the evidence available, PRS rents have risen across Scotland broadly in line with inflation, and to date seldom rise during a tenancy, but with significant hotspots particularly in Edinburgh and some part of Glasgow. There are a number of factors in affordability in the PRS, namely the Local Housing Allowance which has been frozen for a number of years and is now well below actual rents in many areas. Other constraints include the benefit cap which has particularly affected larger families and the restriction to the 'single room rate' for those under 35. Affordability of the PRS is one facet that is contributing to an increase in homeless presentations and demand for social housing, as is the poor reputation of elements of the sector, particularly in lower value, lower rent areas.

**56.** The lack of data on tenancy rental changes in the PRS is a source of frustration and evidence-based policy to inform the position on rent controls cannot be achieved without investment in good data. We must also be clear what role we think the PRS should play in the housing system going forward; without this we risk uninformed regulation with little clear purpose. The discussion on rent controls should be paused until such time as we have better data and more clarity about the role for the PRS.

**57.** In response to recent developments in regard to the High Court's decision on the City of Edinburgh Councils licencing scheme for short term lets, we recommend the replacement of the Civic Government (Scotland) Act 1982 (Licensing of Short-term Lets) Order 2022 with one based on bespoke legislation to overcome the failings exposed by the successful challenge. Not doing so risks the collapse of the licencing of short term lets, an important part of our response to the housing crisis.

**58.** Transformation to shift the priority from landlord property rights onto human and consumer rights and it is critical that this includes appropriate engagement with landlord representatives. Private tenants must be better supported to challenge evictions and better safeguards in place to protect PRS tenants. With 98.5% of tenant eviction challenges failing, the burden of housing can move to the local authority putting further pressures on an already overstrained system. Households becoming homeless from a private rented tenancy has increased and as September 2022 represented 19% of homeless households, higher than it was pre pandemic<sup>9</sup>. Housing to 2040 made commitments around strengthening the rights of tenants, however these must be legislated on, resourced and enforced if we are to even start to make a dent in reform of the PRS.

<sup>9</sup> Scottish Government National Statistics. Homeless in Scotland: Update to 30 September 2022

## Build to Rent

**59.** The Build to Rent (BTR) sector provides a housing option that can meet the needs and affordability of some households and also offers security of tenure due to the commercial nature of the BTR market. As a result of the implementation of the rent freeze (Cost of Living Act 2022), much of the sector lost confidence to invest in Scotland. This was evidenced by large institutional pension funds pulling out of potential deals, which could have delivered a mixture of tenures. The ongoing uncertainty around rent controls in Scotland continues to unnerve investors, who are willing to work within the framework of rent controls but require economic stability and transparency to rebuild their confidence to invest in Scotland's housing sector.

**60.** Insights from the Scottish Property Federation suggest that there are around 17,000 BTR units, including for mid-market rent, in the pipeline, the majority of which are in the pre planning or planning stages, however the lack of certainty around rent controls is leading builders to pause progress. In some cases, investment is being shifted to purpose built student accommodation (PBSA) which is viewed as a more prudent investment at this time.

## Affordable Homes Supply Programme (AHSP)

**61.** Local authorities are having to slow or stop their AHSP, due to it becoming increasingly difficult to afford to deliver new build homes, with more and more projects financially unviable based on the current grant arrangements. Currently the unit cost to deliver a general needs 2 bedroom home is on average over £200,000 across most of the local authorities and in excess of £300,000 on the islands and for rural authorities. Costs were steadily increasing before COVID19 due to increased costs in materials, labour and additional safety standards including fire suppression systems. Costs have continued to increase due to enhanced specifications to meet the Scottish Government's net zero targets, post COVID space standards, inflation and higher price of materials and labour. It is noted that grant levels per unit are generally paid at a higher rate for Registered Social Landlord (RSL) development than for LA development.

**62.** Regarding the AHSP budget 2023/24, at the Housing and Planning Committee, held on 17 January 2023, the then Cabinet Secretary for Social Justice, Housing and Local Government, Shona Robison, spoke to item 3. Budget Scrutiny 2023-24, regarding the reduction in the AHSP capital spend by net 4.6%, a reduction of approx. £37m. Ms Robison stated that that the reduction would be largely mitigated by investment of circa. £15m from the Energy Budget and an investment from the charitable bonds. Ms Robison also acknowledged that the overall cost of building new homes was much higher than 2 or 3 years ago and that work was being done with local authorities and the construction industry to use innovation and try to make every pound stretch.

**63.** As detailed in the Housing Statistics for Scotland Quarterly Update: New Housebuilding and Affordable Housing Supply (March 2023), the number of new build starts to the end of December 2022 had decreased:

- ▲ Latest social sector new housebuilding figures to end December 2022 show an increase of 10% (600 homes) to 6,673 completions, which compares to 6,073 completions in the previous year.
- ▲ Starts fell by 23% (1,175 homes) to 3,832, down from 5,007 starts in the previous year.

**64.** Local authorities AHSP have been further financially constrained, by the Cost of Living (Scotland) Act 2022 passed by Parliament on 6th October 2022 and the subsequent agreement with the social sector to cap social rent increases to £5 per week and local authority Mid-Market Rent increases capped at 3% in line with the private rented sector due to tenants have a private rented tenancy. With the overall result of large reductions in future rental income to the housing revenue account (HRA) and a consequent reduction in investment capacity. Local authorities had to update their business plans, to account for lower income levels than previously forecasted and budgeted, to deliver the AHSP and capital investment programmes, as a result of the emergency legislation.

**65.** A full and transparent review of the AHSP subsidy benchmarks would be a welcome action. The Scottish Government has previously committed to doing so following the most recent review in 2021 however the current levels are often cited as a 'guide' and additional capital support is often provided, however the additional work required to achieve grant approval in these circumstances cause further delays in the construction of new affordable homes.

**Affordable Homes Supply Programme - New homes that have been delivered since 2022 and future delivery as per Local Authority SHIP 2018 – 2023.**

LA - Complete	LA - Under Construction	LA - Future Planned	LA - Total New Build	RSL - Complete	RSL - Under Construction	RSL - Future Planned	RSL - Total New Build
2,578	1,477	3,203	6,250	2,400	3,107	7,570	12,333
Total social rent homes = 18,583							

## Acquisitions

**66.** A significantly expanded acquisitions programme is required so that Councils may purchase more properties on the private market. In the current context of private landlords increasing selling properties, Councils need the flexibility to decide the balance between an increasingly struggling and unaffordable new build programme and buying homes at scale including, where possible, the property portfolios of disinvesting private landlords. Not only would this contribute to faster turnaround of social housing, the repair and improvement of acquired homes would provide jobs for those that are being lost in the new build sector at the present time. The significant scaling up of property purchases to meet housing need was one of the recommendations of the Temporary Accommodation Task and Final Group and has our full support.

**67.** A recent proposal to provide an exemption on Land and Building Transaction Tax (f) and Additional Dwelling Supplement (ADS) on properties purchased by LAs under section 2 of the Housing (Scotland) Act 1988 does not go far enough and limits acquisitions with the AHSP, which would rule out acquisitions in anticipation of inclusion; land banking, land purchased to support improved services for the Gypsy/Traveller community and property bought for use as temporary accommodation would still be subject to LBTT and ADS. We propose that the exemption should be for purchases under section 2 of the 1987 Act to allow for greater local flexibility.

**68.** It would also help if Councils were given some control over decisions to move AHSP spend between councils and in particular the option to increase acquisitions locally rather than lose overall investment where the new build programme faces delays.

## Properties in Void

**69.** There are around 43,000 homes in Scotland that have been empty for six months or more, of these about 28,000 have been empty for more than 12 months<sup>10</sup>. Abandoned houses are at risk of being vandalised and falling into disrepair which increase the cost of repairs making it even less likely that owners will bring them back into use. Empty houses can be a blight on a neighbourhood and contribute to a poor image of areas affected, taking a toll on local economic development.

**70.** Our data collection shows that, of the LAs that were able to supply a figure, there is an average turnover rate of voids of 7.5% and it takes on average 67 days to let. Some LAs have a faster rate to let a previously empty property (North Ayrshire 23 days, South Lanarkshire 28 days, North Lanarkshire and Highland Council (both 32 days) and some for a variety of reasons take longer (Dundee City Council 104 days, Aberdeen City Council 178.5 days and the RSLs in Dumfries and Galloway 240). It should be noted that these performance figures were achieved during 2022/23 but they look very different to this financial year following the severe weather experienced in December 2022. Many LAs are carrying a backlog of voids whereby resources were prioritised to deal with repair issues and dampness in existing tenancies therefore delaying the void management process. The average time taken to relet will look very different for the first half of 2023/24 until the backlog is minimised.

**71.** Some action has been taken in regard to empty homes including the Scottish Empty Homes Partnership and the ability for Councils to increase the tax payable on these properties through the Local Government Finance (Unoccupied Properties etc) (Scotland) Act 2012 however despite the numbers involved and the good will to make the repurposing of empty homes a key component of the solution to the housing crisis, the complexities involved mean this is not a panacea. The vast majority of empty homes are uninhabitable, in locations that would be unsuitable, with owners that cannot be traced or are unwilling to take action to bring them back into use.

**72.** There can also be specific challenges bringing voids back into use working with utility providers, particularly if there are historic meter debts involved with debts requiring to be cleared and meters reset. British Gas have previously been a preferred supplier however pulled out of many local authority contracts during the pandemic and increased energy costs, a move which has not been reinstated. Coordinating with utilities can add complications and time to bringing an empty property back into use in a period where pace is vital. Compulsory Purchase Orders (CPOs) can form one part of the response however local authorities must be supported by Ministers to consider a CPO to bring more empty homes back into use.

<sup>10</sup> SPiCE Spotlight: Empty homes in Scotland: facts, figures and policy (April 2023)  
<https://spice-spotlight.scot/2023/03/08/empty-homes-in-scotland-facts-figures-and-policy/>



# 4 Barriers to Supply

## Planning and Building Standards

**73.** Planning and Building Control fees are set nationally, and none of the 32 Councils achieved full cost recovery at present; various factors mean that only between 35% and 75% of costs are recovered. What we do not want is to create competition between LAs to attract developers with lower fees therefore our view is that fees should be consistent nationally, but set at a level that will achieve full cost recovery and provides appropriate service capacity to meet demands.

**74.** We have had discussions with representatives from industry who have told us that they would be supportive of increased planning fees if it will mean a faster, more efficient service is provided. By investing in planning departments, decisions can be reached quicker providing reassurance to investors and developers, accelerate the supply of new builds and stimulating the economy. This, of course, must be balanced with full consideration of the settlement in question as well as time taken to consult with the existing community.

**75.** Linked to the above, planning departments are increasingly under resourced with unprecedented vacancies. Councils struggle to recruit and retain qualified and skilled planning staff and it is forecast that 700 new planners will be needed over the next 10-15 years to meet demand and address an increase in statutory planning duties. We therefore echo the recommendations of colleagues in Heads of Planning Scotland (HoPS) who have called for new initiatives to increase the number of planners working in Scotland including through apprenticeship schemes, increasing the numbers of planners graduating through funded postgraduate opportunities and better promoting planning as a career. There are at present 2 post graduate Planning Courses available in Scotland (no undergraduate courses) with 169 students however only 5 are Scottish and 9 from the rest of the UK. The remainder are foreign students who cannot get a visa to work in the UK. A conversation therefore needs to take place with universities about the availability of planning courses in Scotland and the attraction of UK nationals to the courses. The options available to support the growth of entrants into the planning profession Scotland is detailed in the Future Planners Project Report, a report by HoPS, RTPI Scotland and the Local Government Improvement Service.

**76.** In regard to the National Planning Framework 4 (NPF4) and the planning process itself, developers are able to work around policies that require affordable housing provision (as well as other requirements) and we continue to see social rented and affordable housing as an exception to be justified rather than an essential part of a balanced housing system. We would like to see consideration of a move to a minimum 25% of social housing provided by developers on new sites and an option to go beyond this in areas with the most significant housing pressures.

### Case study Good practice in Building Standards

The Scottish Building Standards Hub in partnership with Local Authority Building Standards Scotland (LABSS), is able to provide advice and guidance to any stakeholder to support a more efficient and consistent building warrant application process. Such support could be through the use of the Type Approval System for common elements of design and construction or by providing general advice on the application of building regulations and supporting guidance. The Hub can also host and facilitate discussion between the design team (or applicant/building owner) and any one or group of Local Authorities as required.



**77.** The mandatory standards contained within the Scottish Building regulations cover all buildings, including those over 60m. However, the guidance contained within the Technical Handbooks (which are akin to 'deemed to comply' solutions) do not cover buildings over 60m. Where such buildings are being repurposed, it is essential to have early engagement with the relevant Local Authority Building Standards Team and to ensure those working on such buildings have appropriate knowledge and experience to avoid delays.

## Utilities

**78.** Local authorities have been experiencing challenges coordinating the building of new homes with the conditions set by Scottish Water and connection timescales/grid capacity for power suppliers leading to construction delays and higher delivery costs. It is vital that all public bodies be working harmoniously with the delivery of more affordable homes the primary goal if we are to meet the current challenges. The below case study from South Lanarkshire Council highlights some of the challenges.

**79.** A clear national position on issues around water pressure and dual supplies would be a helpful starting point.

As part of its Affordable Housing Supply Programme, South Lanarkshire Council are progressing the redevelopment of several brownfield sites across Hamilton and Cambuslang. As part of the initial site appraisal and pre-development enquiry phase, issues were identified at three of these projects with Scottish Water indicating they will refuse connection to the existing combined sewer as a surface water drainage solution.

By being unable to connect to the existing combined sewer, new dedicated connections to the nearest water course are required for each of the sites which will add significant costs and construction works, potentially making the sites unviable.

The council are continuing to liaise with Scottish Water on minimising any surface water discharge from the sites by utilising new or innovative water storage solutions. This includes rain gardens, living walls and roofs and permeable paving. Due to the smaller nature of these brownfield sites however, space available limits the ability for these solutions to be installed at a suitable scale and there will remain a residual element of surface water discharge which would still require combined sewer access.

## Land and site availability

**80.** Recognising the challenge of meeting new housing targets within current market and construction sector pressures, local authorities are actively exploring new methods to increase the capacity for the overall number of homes that can be delivered. This includes maximising opportunities for social housing within town centre regeneration proposals, reviewing the potential redevelopment of public sector assets and exploring alternative affordable tenures such as mid-market rent.

**81.** A key issue for new housing supply is the availability of suitable sites and land. To tackle this, some local authorities are now establishing their own procurement framework for new housing. This will allow them to specify the details of sites and locations for which they are seeking, enabling developers to bring forward potential sites they own or have an option on for development. This approach seeks to encourage mid-sized, locally based developers to build affordable housing to the specifications determined by local authorities that also meets the needs of the local population, whilst satisfying both tenant expectations and improved sustainability levels within current financial resources.

**82.** Councils are taking these steps because there is currently no other route available through existing frameworks (i.e Scotland Excel or Scottish Procurement Alliance) that gives them the control needed that that won't be vulnerable to challenge. This approach would also allow Councils to focus on regeneration of Vacant and Derelict land or brownfield sites. A review of frameworks with a view to allowing this type of procurement would therefore be a helpful exercise.

**83.** A further challenge in regard to securing land for development is national policy in relation to flood risk avoidance. Although national policy encourages both the reuse of brownfield land and town centres first, many parts of settlements are subject to national policy which simultaneously prescribes flood risk avoidance when undertaking development in those areas. This policy has in effect established a moratorium on new development. While NPF4 softens this stance slightly, allowing redevelopment of previously used sites in built up areas where the LDP has identified a need to bring these into positive use and where proposals demonstrate that long term safety and resilience can be secured in accordance with relevance SEPA advice, the impact of this slight relaxation is yet to be widely tested to determine if it will make a difference in development of settlements.

# 4 Barriers to Supply

**84.** For house builders and their investors to take on projects, in many cases potential sites need to be de-risked to make them more attractive. Innovative financial models to allow LAs to purchase land is also needed, including the use of CPOs to combat land banking. These need to be bold, for example the ability to purchase at existing use value.

## Rent Arrears

**85.** We discussed above the challenges and risks to the HRA in regard to the cap on local authority landlords and the subsequent drop in revenue. Intensifying the risk to the HRA is an increase in rent arrears, which has been rising steadily every year. Total rent arrears on all properties on HRAs at 31 March 2020 was £79m, a rise of £5.6m (7.6%) since 31 March 2019<sup>11</sup>. The roll out of Universal Credit has been singled out as the reason for increased social sector rent arrears and figures from the Scottish Federation of Housing Associations (SFHA) show that the average level of rent arrears for tenants on UC is higher than for those tenants not on UC.

**86.** Current year arrears balances have increased considerably in almost every LA area as a result of the cost of living crisis and the impact reported from the Direct Payment of UC Housing Benefit pilot areas is now being experienced in every area. These trends have been highlighted to colleagues in the DWP.

**87.** A reduction in rental income impacts on HRA business plans and means a lack of resources to build new energy efficient housing to meet AHSP/ESSH2 targets.

**88.** The housing crisis Scotland is experiencing should not be seen in isolation. Chronic housing shortages, increasing homelessness and arrivals from Ukraine and other HP programmes impact a huge range of local service provision including education, social care, community infrastructure, public health, as well as the services provided from the voluntary sector. Fixing it is therefore in everyone's interest.

**89.** A system wide cost/benefit analysis would be a helpful exercise to start to fully understand the interconnectedness between housing and other areas of public spending and the impact of not having sufficient homes. This could ignite a discussion on future capital spending and consideration on the allocation of funding that could have the biggest impact.









# 5 Wider Strategic Issues

## Education

**90.** In March 2022, it was estimated that the number of homeless children was 8,835, an increase of 17% from the previous year. Being homeless or living in poor quality accommodation has a hugely detrimental effect on a child's educational attainment, therefore affecting future prospects. A 2018 report by Shelter sets out the impact of homelessness and bad housing on children's education including on attendance, the impact on children's ability to learn and complete homework, the impact on children's social interactions, on educational outcomes as well as their mental and physical health, confidence and motivation.

**91.** Interrupted learning is identified in the Statutory Guidance for the Education (Additional Support for Learning) Scotland Act 2004 as one of the reasons why a child or young person may require additional support. The guidance also explicitly mentions homelessness as one of the issues which may result in a child needing additional support. Neither the Act nor the Guidance set out exactly why a child experiencing homelessness may require additional support. However, the reasons are well evidenced in research and are closely linked to a broad range of issues which will have a significantly detrimental impact on a child's ability to learn. Experiencing homelessness impacts on children's health, mental health, psychosocial development and academic achievement, it is a form of childhood trauma with impacts that last into adult life. Parents may also be less sensitive and responsive to the needs of their children due to the strain of experiencing homelessness and the factors which resulted in homelessness. It is likely that poverty, removal from a familiar environment and possibly unhealthy living conditions contribute to the disintegration of physical, mental and emotional bonds for children.

**92.** The impact of homelessness may be mitigated by various factors including the length of time in temporary accommodation. Figures for Scotland published in 2022 indicate that families with children are currently experiencing the longest time in temporary accommodation ranging from 234-343 days. Difficulties children experience in school as a result of interrupted learning include low reading scores; teacher ratings of achievement being lower than their peers; cognitive attainment scores below peers; teacher rating of adjustment scores lower than peers indicating behavioural problems. For pre-school children experiencing homelessness there is evidence of delayed speech, language, cognition, social and motor development. The impact on pre-school children

is likely the result of a lack of age-appropriate mentally and physically stimulating materials. Emotional and behavioural problems include separation anxiety; short attention span; withdrawal; aggression; sleep disorders and poor social interaction, laying the foundation for a lifetime of challenges and more likely to experience homelessness themselves in adulthood.

**93.** In summary, the trauma associated with homelessness is likely to be significant and, in turn, has a significantly detrimental impact on educational outcomes. All families experiencing homelessness are unique, but a significant group of households in the homeless system are single parents fleeing domestic or neighbourhood violence, the vast majority being young single women with children. In recent years there has been a growing understanding of the impact of adverse childhood experiences leading to chronic stress. Children experiencing homelessness are likely to be among the most vulnerable in the education system.

## Population migration

**94.** Regional variations in the demand for housing is likely to be exacerbated in coming years as a result of demographic change and migration. Broadly speaking, we are seeing a declining population in a number of council areas in the west of Scotland, and population growth in the east. Population projections to mid-2028 suggest that the population of Scotland as a whole will rise by around 3.5% as a result of inward migration. However, this is projected to be significantly higher in certain areas including Midlothian (12.4%), East Lothian (8.6%), East Renfrewshire (7.4%) and Edinburgh (5.4%). The Scottish Government published its population strategy, A Scotland for the future: opportunities and challenges of Scotland's changing population, in 2021. COSLA and councils are seeking to work with government to ensure that its work on both population distribution and migration reflect the needs and concerns of councils. It is vital that it is aligned to this work and the H2040 strategy.



## Impact on community infrastructure, cultural needs and support

**95.** House building can support sustainable communities and local services by driving investment in regeneration and place making objectives, increasing Council Tax receipts, stimulate local growth through ongoing expenditure by new residents and via developer contributions towards affordable housing and infrastructure to support schools, healthcare, open spaces, transport, sport and leisure facilities.

**96.** Scotland's Local Authority leaders at both a political and officer level have committed to Scotland being a welcoming and safe country for those fleeing war or persecution. With cuts to the core budget, however, we must be cognisant of the additional costs and resource implications on Councils to provide the additional wraparound support to refugees and asylum seekers, beyond housing requirements.

**97.** Currently the tariff paid for newly acquired beds for asylum dispersal is a one off payment of £3500 per bed. This was introduced in 2022, but analysis previously undertaken by Glasgow City Council highlighted that it costs to the council on average c. £6000 per year for every asylum applicant that they host. Funding provided for contingency accommodation is considerably less and, again, is in the form of a one off rather than recurring payment. In the last two years it has also been provided as a 'snapshot' payment to reflect the number of people residing in hotels as at 1 April and it therefore has not reflected the increasing number of people being accommodated through the course of the year. In regard to resettlement programmes, we know that LAs are satisfied with the tariffs they received for Syrian, Afghan and UKRS programmes partly because they cover 3 or 5 years of integration support and reflect the costs of integration work, education and health support. One of the significant challenges for the Ukrainian programme, however, is the short-term nature (1 year) of funding support for housing teams. Long term, secure funding is critical for Councils to put detailed and robust plans in place to meet the needs of New Scots and build the necessary infrastructure around communities to ensure Scotland is a welcoming country.

## Health

**98.** Housing has the potential to reduce or reinforce health inequalities, and good health starts with a decent, affordable home. Poor housing conditions can have a huge impact on an individual's physical and mental health and cause conditions including cardiorespiratory disease, impact digestive health as well as cause and exacerbate allergies and skin conditions. It's also a risk factor for mental ill health and contributes to stress, anxiety and depression. When our homes are of a decent quality, the comfort and security they provide enrich our lives and support our mental and physical health allowing people to thrive as members of society and the economy. That's why it's essential for everyone in Scotland to be able to access and afford a decent home. LAs are witnessing an increase in need for more adapted properties and specialist properties for those with complex needs, including larger properties as well as single occupancy and we are at risk of contributing to health inequalities by not being able to meet all demands.

## Economic Development

**99.** The building of new homes presents a number of opportunities which can help realise many of Scotland's economic development ambitions including town centre regeneration, employability, skills and labour. In 2019, a total of 22,673 new homes were built in Scotland, figures from Homes for Scotland suggest that this provided:

- ▲ 79,200 jobs, equivalent to 3.5 jobs for every home built
- ▲ £387m invested in land and buildings for homes
- ▲ £807m spend on goods, services and materials
- ▲ £3.4bn direct, indirect and induced gross value added (GVA)<sup>12</sup>

**100.** There is also a huge amount of economic benefit, jobs and money involved in the repair, maintenance and improvement of existing homes.

**101.** Maintaining the status quo runs the risk of storing up a future retrofit cost, risking net zero, continuing to see increasing house prices, losing out on the jobs and skills dividend and failing to deliver recovery and growth post pandemic.

<sup>12</sup> All figures from Homes for Scotland, The Social and Economic Benefit of Homebuilding in Scotland. March 2022 chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://homesforscotland.com/download/the-social-and-economic-benefits-of-home-building-in-scotland/?wpdmdl=3624&refresh=6447d7a5e516f1682429861

# 5 Wider Strategic Issues

**102.** As highlighted previously in this report, housing supply shortages has a particular negative effect on the economies of rural and island communities. A shortage of housing has been exacerbated in areas such as the Western Isles where 13.3% of properties are laying empty due to increase in buy-to-let and owners of second homes<sup>13</sup>. Figures are similar in Argyll and Bute (10.4%), Orkney and Shetland (both 9.1%) and Highlands (6.7%)<sup>14</sup>. Rural and island businesses struggle to recruit and retain workers, in part due to housing shortages, young people are priced out of the local housing market and the subsequent depopulation threatens the sustainability of local services. Research by Highlands and Islands Enterprise suggested that 1,800 new properties are needed each year across the private and social sectors just to keep pace with demand<sup>15</sup>. More homes will be needed for rural and island authorities to make inroads to addresses the challenges, not just avoid the current situation worsening. Consideration should also be given to legislative powers to restrict the sale of housing in pressured areas for second and holiday homes as has been successfully implemented in a number of English authority areas.

## Scotland's Climate Ambitions

**103.** Scottish Government legislation requires new buildings to use zero direct emissions heating as well as featuring high levels of fabric energy efficiency to reduce heat demand so that they do not require retrofitting in the future. This commitment is reflected in the recent announcement to end the use of gas oilers in new builds by 2024 and move to Passivhaus standards for all new homes, but these come at a significant cost. Local Authority built homes are built to a high standard of energy efficiency and Councils have been at the forefront of delivering innovative net zero housing, for example the net zero housing development in Granton, Edinburgh.

**104.** The Committee on Climate Change (CCC) has concluded that the UK cannot meet its climate objective without a major improvement in UK Housing.

**105.** Holyrood's Net Zero, Energy and Transport Committee concluded a year long inquiry in January 2023 and stated clearly that Scotland will not meet target to be net zero by 2024 without a more empowered local government sector<sup>16</sup>. Ensuring that new builds meet stringent environmental standards as

well as decarbonising and retrofitting existing housing stock will be key to this however both come with a significant cost. This echoes findings from the Accounts Commission who are clear that local authorities will not achieve current targets at the current rate of progress which is linked to the resources, or lack thereof, that have been made available to Councils by central government. Not only is the cost of retrofitting vast, but an unintended consequence could be the diluting of new build ambitions to ensure rent affordability.

**106.** In 2023 the Scottish Government announced plans to introduce new minimum environmental design standards for all new build housing to meet a Scottish equivalent to the Passivhaus standard. The cost implications of this are substantial. While it currently costs around £200k to build a new social rented home, this will rise significantly with the new standards. The costs associated with meeting the Energy Efficiency Standards in Social Housing (EESHS2) requirements is hugely significant; the Education and South East Regional Housing Partners (a partnership of West Lothian, Midlothian, East Lothian, City of Edinburgh, Borders and Fife) has conservatively estimated that it will take over £2 billion of investment to meet the demands. This is inherently linked to the ability to build more council homes and highlights the need for appropriate funding to meet increasing legislation obligations relating to energy efficiency and zero carbon. The standards are also vitally important if we are to protect residents from fuel poverty. As highlighted previously when discussing the AHSP, the costs of building new homes for social rent are becoming prohibitive.

**107.** We should also acknowledge that while it is important for every sector to participate in a transition to sustainable energy sources, social housing is not a significant source of carbon emissions; the best estimate is that it produces 2% of all emissions. Social housing homes are smaller and more energy efficient than other sectors and between a third and a half of all occupants under heat their homes. The priority for LAs is tackling fuel poverty. More of a priority needs to be put on owners and the PRS and we should not be imposing costs on tenants that we are not prepared to impose on owners and PRS landlords; this is important for the transition to net zero to be a 'just transition'. In addition, more focus on the bigger emitters like transport and agriculture, included degraded peatland, would be pragmatic.

<sup>13</sup> [www.money.co.uk/mortgages/first-time-buyer-mortgages/housing-shortages-vs-empty-homes](https://www.money.co.uk/mortgages/first-time-buyer-mortgages/housing-shortages-vs-empty-homes)

<sup>14</sup> [www.money.co.uk/mortgages/first-time-buyer-mortgages/housing-shortages-vs-empty-homes](https://www.money.co.uk/mortgages/first-time-buyer-mortgages/housing-shortages-vs-empty-homes)

<sup>15</sup> [chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.hie.co.uk/media/3033/stimulatingplushousingplusdevelopmentplus-plusreport.pdf](https://chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.hie.co.uk/media/3033/stimulatingplushousingplusdevelopmentplus-plusreport.pdf)

<sup>16</sup> <https://sp-bpr-en-prod-cdnep.azureedge.net/published/NZET/2023/1/23/2c9752ff-eb3f-4273-8f78-e726676a3b6e/NZET062023R1.pdf>







# 6 Conclusion and Recommendations

**108.** Scotland is in a housing emergency. Homelessness is rising, there are over 14,000 households, including more than 9,000 children, in temporary accommodation provided by local authorities and another c 5,000 in hotels and cruise ships provided by central government for Ukrainians, Afghans and people seeking asylum. Those experiencing homelessness, Ukrainians and other refugees have the same right to permanent housing. A number of Councils are failing to meet their statutory duty while at the same time, the Scottish Government is providing accommodation that almost universally breaches the UAO. Supply of affordable homes has fallen 20% in 3 years and shows no sign of recovering; we need an additional 10-15,000 relets each year just to keep up with current demand. Based on an average turn over of around 8%, that means growing the social sector by at least 125,000 homes to meet current demand.

**109.** The private rented sector is shrinking and the building of new homes is becoming increasingly difficult. There are not enough affordable homes available for rent to meet demand and planning future provision is not adequate. LAs are committed to playing their part in supporting humanitarian programmes and supporting those who have come to Scotland seeking safety, however the increase in arrivals from Ukraine has exacerbated the housing crisis and served to highlight the unprecedented housing and homelessness challenges that we face.

**110.** The wider benefits to building more and better quality homes is well documented. Better health and an improved quality of life, better educational attainment for young people, significant economic benefits and achieving net zero ambitions are all inextricable linked to housing.

**111.** Solace, COSLA and ALACHO have consulted widely with local authority representatives including all Chief Executives, Heads of Housing and colleagues from HoPS, LABBS and ADES. Based on the content of this report, we have detailed below a series of recommendations of both short and long term actions that can collectively be taken to help to mitigate the unsustainable pressure on housing. To be clear, action to address the housing crisis must be swift and done at a scale and pace that we have not seen before if we are to collectively achieve the shared desired outcome of providing everyone that requires it a secure home. Only with collaboration between local and central government can this be achieved.

**112.** Response nationally has tended to be managed in separate work streams, one relating to refugees, the other structured around Ending Homelessness Together and the Rapid Rehousing agenda with the More Homes team continuing to focus as best they can on business as usual for the AHSP. The nature of the duty owed by

Councils to Ukrainian and other refugees is no different to that owed to homeless applicants more widely therefore a more joined up approach that takes a holistic view of housing provision in Scotland is vital. Housing to 2040 makes a commendable step to do just this, however there must be a clear implementation plan and the H2040 vision must translate into policy.

## Recommendations – Short term (1 to 3 years)

**113.** The Scottish Government could take the below action to support LAs deal with acute housing pressures. Across all workstreams at a national level regarding legislative and policy responses to the housing crisis and homelessness, it is absolutely imperative that local authority practitioners are included from an early stage and that genuine and meaningful engagement with councils is the standard way of working.

## Legislation and Policy

- ▲ Temporarily revise the Unsuitable Accommodation Order to allow the use of Bed and Breakfast accommodation for longer than 7 days, similar to the revision made during the pandemic.
  - ◆ If no revision is possible, a commitment from SG to work with advocacies such as Shelter and CLAO to discourage the active seeking of financial damages for breaches of the UAO, which is further diminishing homeless budgets, and monitor costs incurred by LAs in defending/ reacting to Judicial Reviews
- ▲ No local connection:
  - ◆ Temporarily pause the modification of local authorities' powers under Section 33 of the 1987 Act and allow referrals to be made to other Scottish authorities where a household is assessed as having 'no local connection'
  - ◆ As a minimum, work with local authorities to put in place a referrals system to allow households to make a coordinated transfer to another local authority to ensure wrap around support services, provisions for education and any safeguarding and environmental risks assessments can be carried out where needed, to allow transfer to be successful and tenants can sustain their new tenancy.
  - ◆ In regard to the new proposed homeless prevention duties, consideration given as to how the removal of local connection will impact an LAs ability to prevent homelessness in areas outwith their own council boundaries and how this will be recorded once a duty is agreed.



- ▲ The PRS:
  - ◆ A lifting of the Emergency Powers legislation; the evidence demonstrates that it has not achieved what it set out to do and instead is impacting on investment as well as wider relations with the PRS and BTR sectors;
  - ◆ A pause on further discussion on rent controls until such time as we have better data and more clarity about the role for the PRS.
- ▲ Homelessness and temporary accommodation
  - ◆ The implementation of the 15 recommendations from the Temporary Accommodation Task and Finish Group, including funding and guidance to develop and implement the recommendations and ensure a consistent approach across LAs;
  - ◆ A review of the guidance on homelessness and threatened with homelessness for PRS tenants facing eviction on defensible grounds;
  - ◆ Temporarily pause for Local Authorities the new proposed Prevention duties which will extend the definition of threatened with homelessness to 6 months and make LAs responsible for ensuring a suitable and sustainable outcome is achieved. This will likely compound and place further pressures on existing limited stock.
- ▲ Revision of Planning and Building fees at a consistent national level that will achieve full cost recovery for Councils;
- ▲ An early decision to exempt LAs from LBTT and ADS for acquisitions under section 2 of the 1987 Housing (Scotland) Act to allow for greater local flexibility in regard to exemptions for acquisitions;
- ▲ Consideration of the implications of national policy in relation to flood risk avoidance and the availability of sites for development;
- ▲ In regard to NPF4 and the planning process, consideration of a policy of minimum 25% allocation for social housing by developers on new sites, with scope to go beyond this where most needed;
- ▲ Exploration of legislative powers to restrict the sale of housing in pressured areas for second and holiday homes;
- ▲ Replace the Civic Government (Scotland) Act 1982 (Licensing of Short-term Lets) Order 2022 with one based on bespoke legislation to overcome the failings exposed in the recent High Court challenge to City of Edinburgh Councils scheme;
- ▲ Work with local government (Scotland Excel) to review procurement frameworks to allow for the expansion of scope for procurement of sites for new housing, allowing LAs to specify the details of sites and locations for which they are seeking;
- ▲ Review of legislation, guidance and regulatory expectations to ensure that all RSLs provide an appropriate level of support to councils in meeting the housing needs of homeless applicants.

## Funding and finance

**114.** Solace, COSLA and ALACHO are clear that Councils require multi-year settlements to maximise the positive and lasting impact of public spending. Resourcing on an annual basis is not a best value approach and we reiterate the need for a shift to multi-year budgets.

- ▲ UK and Scottish Government must provide adequate resources to enable councils to participate in the humanitarian schemes that they have established, with appropriate, long term, secure funding being key. A more joined up approach between the UK Government and Scottish Government is required for accommodating refugees and people seeking asylum that does not undermine Councils broader strategies in relation to housing and homelessness and allows councils to participate in humanitarian protection programmes in an equitable way;
- ▲ Appropriate funding to meet increasing legislative obligations relating to energy efficiency and zero carbon including retrofitting;
- ▲ Long term multiyear funding is required to continue to deliver Rapid Rehousing Transition Plans (RRTPs). The lack of certainty, short notice and annual funding is creating risk and is likely to impact success to date, with the uncertainty on job security meaning employees are leaving fixed term roles impacting both inhouse and commissioned services. Certainty and long term commitment to funding is needed urgently.
- ▲ A review of the way in which funding allocations are calculated; simply basing awards on the number of homeless presentations does not take local circumstances into account;
- ▲ Commitment to provide appropriate new burdens funding to support local authority homelessness services to implement forthcoming legal duties in relation to homelessness prevention;
- ▲ Exploration of innovative financial models which would help allow LAs purchase land for development

# 6 Conclusion and Recommendations

## Support to increase social housing stock

- ▲ Support local authorities to consider compulsory sales orders to help bring more empty homes back into use. In addition, support a faster process of CPOs to combat land banking.
- ▲ In regard to the AHSP:
  - ◆ A review of the AHSP with a view to providing greater flexibility in relation to property acquisitions where new build is not viable, before being reallocated to another area;
  - ◆ Enable cross subsidy of Scottish Government budgets from AHSP and Longer-Term Accommodation Funds, to allow LAs the flexibility to make the best use of funds to meet local circumstances;
  - ◆ Consider using AHSP grant to fund the development of high quality temporary accommodation in local authority areas where there is evidence of high demand and expenditure on temporary accommodation and low turnover of existing social rented housing supply;
  - ◆ A full and transparent review of the AHSP subsidy benchmarks
- ▲ A review and agreement on grant levels to support acquisitions including those with tenanted possessions

## Other

- ▲ New initiatives to increase the number of planners working in Scotland including through apprenticeship schemes, engagement with universities, increasing the numbers of planners graduating through funded postgraduate opportunities and better promoting planning as a career, as details in the HoPS/RTPI Scotland/ Improvement Service Future Planners Project Report;
- ▲ Better dialogue and coordination between the Scottish Government, local authorities and Scottish Water to quickly and efficiently work through any concerns with premises or sites that can delay supply. This should include a clear national position on issues around water pressure and dual supplies;
- ▲ Investment in good quality data on all aspects of the PRS to inform evidence based decision making;
- ▲ A clear understanding and articulation of the role national government wants the PRS to play in the Scottish housing system longer term to help inform future regulation;

- ▲ Clear expectations for the contribution of partners towards both preventing homelessness and supporting those who do become homeless;
- ▲ A focus on understanding the varying levels of homeless applications between local authority areas to inform our approach long term;
- ▲ Work with local authorities and energy suppliers to reintroduce the option for a preferred supplier scheme for the social rented sector to help address unnecessary delays in relets.
- ▲ Further dialogue between Scottish local authorities, the Home Office and Mears with a genuine commitment for the proportionate dispersal of asylum seekers throughout Scotland so as not to unduly impact certain parts of the country

The measures highlighted above would only seek to ease the immediate pressures on local authorities in the short term.

## Recommendations

### Medium term (4 to 10 years)

**115.** We need to consider how we collectively accelerate house building programmes and increase the pipeline of projects with partner Housing Associations.

Even with modern methods of construction such as offsite manufactured panelised timber frame construction used for the Edinburgh Demonstrator Project and offsite modular construction such as the North Ayrshire Council development at Seamills, the delivery of homes from design stage through to site complete can take 2-3 years depending on size and complexity. This reiterates the need for multiple work streams to run concurrently to increase additionality of social housing, such as support for an expanded acquisitions programme.

Local authorities cannot wait for the new build homes to come online, and the availability of homes in void to bring back into use is finite, therefore other initiatives must take place in parallel with the AHSP including;

- ▲ A significantly expanded acquisitions programme including a significant push around how we start to capture vacant properties in town centres for conversion/redevelopment and increase the scale of this within the AHSP;

- ▲ A renewal of the ten year old Private Rented Sector Strategy as the basis for long term decisions on regulation including tenancy reform and rent controls, informed by good quality data
  - ◆ This should include a review of the legislative framework around ‘reasonableness’ in eviction actions with a focus on a human rights based interpretation so we can move the discourse away from landlord rights and towards putting the sector in the consumer rights and trading standards context
- ▲ Direct support to third sector organisations to increase the levels of support for tenants at the First Tier Tribunal Housing and Property Chamber (FTT)
- ▲ A wholesale updating of the homeless code of guidance with a longer term view to tackling homelessness, one that incorporates the wider changes now in place, sets out more formal roles for key partners such as health and social care and formalises the role of IJBs in delivering Rapid Rehousing Transition Plans;
- ▲ A review of investment capacity in the social housing sector as the basis for reviewing the appropriate level of support for the two significant investment pressures – supply and fuel poverty;
- ▲ A national policy focus on measures that will help low/middle income households afford other tenures outwith the social rented sector;
- ▲ An increased focus on owner occupiers and the PRS to meet environmental standards to contribute to net zero targets and;
- ▲ A greater focus on the biggest carbon emitters including transport and agriculture (including degraded peatland).

**116.** Scottish local authorities need certainty of support and funding. The funding across many of the humanitarian programmes has been assessed as inadequate, while wider Local Government funding for preventing and responding to homelessness is already under significant pressure. Funding for the AHSP needs to be increased to meet the scale of the ambition required and take into account inflation and retrofit costs.

- 117.** Housing to 2040 is an ambitious strategy, which sets out action to address the housing crisis including:
- ◆ Delivery of a further 100,000 affordable homes over the following ten years up to 2031/32, with at least 70% of these for social rent
  - ◆ Specific action to support housing development in rural and island areas, helping to stem rural depopulation and supporting communities to thrive
  - ◆ A shift of the planning system to more directive and the quality of place
  - ◆ Publishing of a new Rented Sector Strategy
  - ◆ The delivery of the Ending Homelessness Together action plan
  - ◆ Legislating of the short term sets licencing scheme
  - ◆ Tackling empty homes
  - ◆ An audit of current housing and homelessness legislation
  - ◆ All new homes delivered by RSLs and LAs to be zero emissions by 2026
  - ◆ Introduction of a new Housing Standard

**118.** The vision in H2040 needs to be embedded across central government departments and translate into policy and resource allocation. The recommendations that we have set out in this report will help us collectively achieve the ambitions set out in Housing to 2040. Early and genuine engagement with local authority practitioners is vital and our formal ask is that Solace, ALACHO, COSLA and other appropriate local government professional bodies are included throughout all national government workstreams relating to housing and homelessness at the appropriate strategic level.

**119.** In addition, we need a Board that meets on a more regular basis and the reinvigoration of the urgency about the changes to the housing system that we need. There is no one silver bullet to solve the housing crisis in Scotland. We need to take a pick and mix approach, taking into account the nuances of each local authority area and what will work best for them and their communities.

**120.** This report will be published on the Solace Scotland website and our intention is that it will form the basis of engagement at both officer and political level with the UK and Scottish Government’s. Solace, COSLA and ALACHO will seek a roundtable meeting with both governments to discuss the content of this report, the recommendations that we have made and to agree action to implement the developments required at pace.







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