



# Housing to 2040 Consultation: Analysis of responses to the consultation



**PEOPLE, COMMUNITIES AND PLACES**

# Housing to 2040 Consultation

## Analysis of responses to the consultation

September 2020



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# Executive Summary

A note on Coronavirus (COVID-19) from Scottish Government:

Since this consultation was carried out, the COVID-19 outbreak has had a significant impact on Scotland.

The consultation process ran between December 2019 and February 2020 and was not affected by the outbreak, with the exception of the necessary cancellation of events on Jura and Islay. We will work with those communities as we progress Housing to 2040 to make sure that their views are heard.

As the consultation was largely unaffected by the outbreak and it was not raised as an issue by respondents or at events, no reference is made to COVID-19 in this report in respect of the policy content of Housing to 2040.

The pandemic sets work on Housing to 2040 in a new context. While there are new imperatives for our homes and communities in the shorter term, the longer term draft vision and principles consulted upon remain relevant.

Taking forward work on Housing to 2040, in light of what people across Scotland have told us through this consultation and in the context of the COVID-19 pandemic, will be an important part of Scotland's recovery.

This report presents an analysis of responses to the public consultation on Housing to 2040. The consultation exercise ran from 2 December 2019 until 28 February 2020. The consultation involved an online questionnaire with eight open ended questions and 15 stakeholder consultation events facilitated by the Scottish Government.

Some 202 responses were received to the consultation and this report presents the analysis of these responses, and of the notes from the 15 stakeholder events.

**Table 1.1: Breakdown of respondents by individuals and organisations**

Category	Number of respondents	Percentage of respondents
Individuals	28	14%
Organisations	174	86%
<b>TOTAL</b>	<b>202</b>	<b>100%</b>

## Background

Housing policy has a vital role to play in achieving many of Scotland's aspirations, including eradicating child poverty and homelessness, ending fuel poverty, tackling climate change and promoting inclusive growth. The Scottish Government's

ambition is that everyone in Scotland should live in high quality, energy efficient homes that are affordable and that meet their needs.

In the Programme for Government 2018-19, the Scottish Government committed to creating a vision for how our homes and communities should look and feel by 2040 and the options and choices to get there. A draft vision and set of guiding principles was published in July 2019.<sup>1</sup> This consultation sought views on this vision and the options for how to make it a reality.

## **Approach to the analysis**

Responses were downloaded from Citizen Space and uploaded into qualitative analysis software NVivo. Responses were coded into relevant themes and sub-themes and the analysis of these is presented in this report.

The consultation document asked respondents to make detailed suggestions in response to Questions 3 to 7 under a series of suggested headings including:

- Who needs to make it happen and what type of action is required? E.g. facilitation, regulatory, financial, infrastructure, training etc.
- How much it costs and who will pay?
- Who is needed to do the work (workforce)?
- How long the proposal would take to implement and whether it is a temporary or permanent measure?

While respondents did provide many practical and innovative suggestions which have been included in our analysis, it is important to note that most of the responses did not provide the high level of detail requested in response to the specific questions above.

However, responses received were detailed and balanced, and there was significant consensus across the responses and across sectors. There were no significant disagreements between sectors, or significant tensions between responses. There was a great deal of commonality in relation to proposals made for change and future development. Many constructive, creative and innovative suggestions were made for future developments. This is encouraging, and a positive position from which to move forward.

Below we outline the key findings from the analysis.

## **Visions and Principles**

In general, the draft vision and principles were broadly supported by respondents and were praised for being both ambitious and comprehensive. Principle 15: Everyone has a right to an adequate home was particularly strongly supported by the respondents.

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<sup>1</sup> <https://www.gov.scot/publications/housing-to-2040/>

Some respondents expressed doubt over how realistic and achievable the aims were given the challenges faced by the housing sector. In some cases, respondents suggested revisions to the particular phrases in the draft vision and principles in order to strengthen statements or clarify points further.

## **Comments on the scenarios and resilience of the route map**

Respondents' comments on the scenarios and resilience of the Housing to 2040 route map or constraints were disparate, with mixed views expressed within all respondent types, i.e. there were no obvious trends or preferences by sector interest, which is, of itself, interesting.

The most commonly discussed themes included Scotland's ageing population and the challenges this poses for the housing sector; comments related to the challenges presented by various social, economic and environmental trends, including the increasing proportion of single person households; the gap between life expectancy and healthy life expectancy; the growth of holiday lets and student accommodation; and climate change.

Other themes that were identified included availability of affordable high-speed internet, access to active and sustainable travel, and depopulation.

Some respondents also commented about the cost of achieving the Housing to 2040 vision, observing that local authorities will require financial support from the Scottish Government to deliver the vision, while others emphasised the importance of enhancing the skills and availability of construction and trades workers, particularly in the context of Brexit.

## **Proposals for increasing the affordability of housing in the future**

Many respondents called for affordability to be more clearly defined in relation to housing and for there to be a common definition to which everyone could work.

Some respondents considered increasing the supply of housing to be key to improving affordability, while others suggested that a range of factors needed to be implemented. These included maximising the benefit of public sites; implementing a range of more innovative construction methods (such as off-site construction); enabling more investment and offering incentives; increasing support for home-buyers and home ownership; and making changes to taxation, with Land and Buildings Transaction Tax (LBTT) being most commonly cited.

## **Proposals for increasing the accessibility of existing and new housing for older and disabled people**

Many respondents felt there was a significant shortage of accessible housing and the need for this to be addressed. Comments were made in relation to both existing and new housing.

Many emphasised the need to make adaptations to existing housing stock but recognised that this was challenging due to a range of factors including cost and

planning constraints. Nevertheless, a range of specific suggestions were made, including adaptations such as widening doorways, installing accessible showers as standard and installing charging points for electric wheelchairs.

There were mixed views in relation to the development of new housing – with some respondents arguing that all future housing should be fully accessible, and others arguing that investment should focus on a minimum number or proportion of units. Many agreed that building in flexibility at the outset, to allow for changes based on need to be made at later points was desirable.

Other comments related to alternative building types and methods (for example co-housing model and more communal spaces into new build developments); more extensive opportunities for self-build; better regulation of adaptations and new housing; and calls for a single government framework for adaptations regardless of tenure. Other issues raised included calls for further support for independent living; support to people wishing to downsize; and the increased use of technology to improve accessibility.

Some respondents also highlighted challenges with enforcement of regulations.

## **Proposals to help Scottish Government to respond to the global climate emergency by increasing the energy efficiency and warmth and lowering carbon emissions of existing and new housing**

Respondents provided a wide range of detailed suggestions to help the Scottish Government respond to the global climate emergency. Key issues raised included the need for greater regulatory stipulations and higher standards to be applied to new build housing. Other suggestions included ensuring that adaptations are made to existing housing stock and trialling new construction methods to enhance energy efficiency and reduce carbon emissions.

Respondents also discussed the need to ensure a transition from oil and gas to other energy forms, tensions between energy efficiency and heritage (e.g. maintaining the aesthetics of older buildings and complying with listed building requirements) and the need for a mix of regulation and monitoring alongside education, advice and financial support across all tenures.

## **Proposals to improve the quality, standards and state of repair of existing and new housing**

The most common suggestions for improving the quality, standard and state of repair of housing focused on repairing and maintaining existing housing stock and the importance of developing a single set of standards for maintenance across all tenures. Respondents suggested various penalties, such as fines or increased Council Tax, and incentives, such as loans and grants, to encourage owners to maintain their properties adequately.

Energy efficiency was a key consideration, with some respondents noting that the standards for maintenance should encompass improvements designed to enhance

a property's energy efficiency, while some noted that existing housing should be upgraded to meet the same standards as new build properties, especially in terms of energy efficiency.

Other suggestions included enhancing the skills of people working in the construction industry and related trades, introducing greater regulation of tradespeople, exploring the use of innovative construction models such as off-site construction, bringing empty homes back into use, and various measures to improve the quality of new build housing such as reviewing and refreshing the standards set out in Housing for Varying Needs.

## **Proposals to improve the space around our homes and promote connected places and vibrant communities**

Many respondents emphasised the importance of shared green and/or open spaces in improving the areas around our homes and promoting connected places and vibrant communities, with a common view that these can contribute to climate change adaptation and mitigation, as well as promoting physical and mental health and wellbeing among residents.

Many also identified the importance of enabling people to access active modes of travel and/or public transport safely and easily. Respondents noted that this might require enhancements to local infrastructure, such as upgrading street lighting or cycle paths. Again, there was an emphasis on the benefits of active and sustainable travel for climate change and health and wellbeing. Easy access to services and amenities such as shops, exercise and leisure facilities, education and healthcare was also considered a priority.

## **Next steps**

The findings from this research will inform the development of a final vision for, and route map to, 2040.

# Introduction

## Overview of the context for the research

This report presents an analysis of responses to the public consultation on Housing to 2040. The consultation exercise ran from 2 December 2019 until 28 February 2020. The consultation involved an online questionnaire with eight open ended questions and 15 stakeholder consultation events facilitated by the Scottish Government.

Housing policy has a vital role to play in achieving many of Scotland's aspirations, including eradicating child poverty and homelessness, ending fuel poverty, tackling climate change and promoting inclusive growth. The Scottish Government's ambition is that everyone in Scotland should live in high quality, energy efficient homes that are affordable and that meet their needs.

The Scottish Government has already taken steps to improve Scotland's housing system and people's experience of it. This has included:

- renewing their commitment to social housing through record investment;
- ending 'Right to Buy';
- improving protections and standards for tenants in the Private Rented Sector;
- alleviating poverty through full mitigation of the bedroom tax via Discretionary Housing Payments;
- as well as the introduction of the Universal Credit Scottish choices.

Furthermore, over 145,000 homes have been refitted to be warmer, greener and more energy efficient through the Home Energy Efficiency Programme, and since April 2016, 34,791 affordable homes have been delivered to end March 2020, over 23,000 of which were for social rent.

The Scottish Government wants to ensure we have a housing system that is dynamic and resilient enough to respond to future changes, and can help to address the number of challenges we are facing which mean that business as usual is not an option. In Programme for Government 2018-19, the Scottish Government committed to creating a vision for how our homes and communities should look and feel by 2040 and the options and choices to get there. A draft vision and set of guiding principles was published in July 2019.<sup>2</sup>

## Draft vision and principles

Scotland's National Performance Framework<sup>3</sup> provides the high-level vision for Scotland. The draft housing vision for 2040 describes in more detail what we want

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<sup>2</sup> <https://www.gov.scot/publications/housing-to-2040/>

<sup>3</sup> <https://nationalperformance.gov.scot/>

the housing system to look and feel like in the future. It is meant to be ambitious and aspirational. The vision is person-centred, and views the system from the citizen's perspective to reflect the diversity of people, homes and communities across Scotland. The vision is also for all those involved in housing delivery and services - making the vision a reality will require action from Scottish Government, public, private and third sector partners and the people of Scotland. The principles underpinning the vision are a high-level guide to how policy decisions might be made to make the vision a reality.

## **Challenges facing the housing sector**

The draft vision and principles begin by detailing some of the challenges facing the housing sector<sup>4</sup>. The challenges include the following:

### **Scotland's ageing population**

Demographic trends show our population ageing with increased life expectancy. This means that demand for health and social care and other support services will rise in the future. The Scottish Government is committed to promoting greater choice and flexibility in housing as we know that living in the right house with the right support helps people to live safely and independently at home for longer and can reduce demand for health and social care services.

### **More households and changes in household types**

The number of households in Scotland is increasing and more people are living alone. One person households are set to become the most common household type in Scotland in the future. With this in mind, consideration must be given to the design and type of new homes we build, and where and how we can make the best use of existing housing stock.

### **Climate change**

It is important that we mitigate and adapt to the impacts of climate change now and in the future. Homes must be energy efficient and resilient to the impacts of climate change. The Scottish Government is currently updating the Climate Change Plan and Energy Efficient Scotland route map and developing a Heat Decarbonisation Policy Statement, to reflect the increased ambition of the new targets<sup>5</sup> set in the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019. The second Climate Change Adaptation Programme 2019-2024<sup>6</sup> was launched in 2019 to help prepare for the impacts of climate change.

### **Homelessness**

According to data collected by local authorities, approximately 30,000 households in Scotland were assessed as homeless or threatened with homelessness in

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<sup>4</sup> <https://www.gov.scot/publications/housing-to-2040/pages/some-challenges/>

<sup>5</sup> <https://www.gov.scot/policies/climate-change/reducing-emissions/>

<sup>6</sup> <https://www.gov.scot/policies/climate-change/climate-change-adaptation/>

2018/19<sup>7</sup>. The Scottish Government has made a number of assurances towards ending homelessness<sup>8</sup>, including publishing the Ending Homelessness Together action plan, extending the Unsuited Accommodation Order and most recently reconvening the Homelessness and Rough Sleeping Action Group to help us to further develop and support the delivery of our plans.

### **Child poverty**

Nearly a quarter of all children in Scotland (23%, 230,000) were living in relative poverty in 2018/19<sup>9</sup>. The Scottish Government is committed to ending child poverty and the housing system plays a key part in this. In 2018, the Scottish Government published 'Every Child, Every Chance: the Tackling Child Poverty Delivery Plan 2018-2022'<sup>10</sup> which sets out targets to reduce the number of children experiencing the effects of poverty by 2030. The plan states "housing is a very significant – and unavoidable – household cost that our child poverty targets take into account".

### **Fuel poverty**

Approximately a quarter of households in Scotland (25%, 619,000) are living in fuel poverty<sup>11</sup>. This is driven by challenging weather conditions, poor energy efficiency standards in the home and reduced heating options<sup>12</sup>. The Scottish Government is addressing the challenge of fuel poverty in a number of ways, including helping households to make energy-saving home improvements and agreeing aspirational future milestones for energy efficiency in social housing.

## **Consultation responses**

The consultation ran between 2 December 2019 and 28 February 2020 and received 209 responses via the Citizen Space online portal and email. However, we removed seven responses that we identified as duplicates. Six of these consisted of identical responses being received from the same organisation and, in one case, two organisations submitted an identical joint response.

We did not identify any 'campaign responses' during our analysis. These are responses submitted through a co-ordinated campaign, often using standard text provided by the campaign organiser.

Overall, we included 202 responses in our analysis. In addition, we analysed notes taken at the 15 stakeholder consultation events hosted by the Scottish Government, which were attended by around 236 people. Any additional responses submitted outwith the consultation period have not been included in this report but

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<sup>7</sup> <https://www.gov.scot/publications/homelessness-scotland-2018-2019/>

<sup>8</sup> <https://www.gov.scot/publications/homelessness-progress-update-2019/>

<sup>9</sup> <https://www.gov.scot/publications/poverty-income-inequality-scotland-2016-19/>

<sup>10</sup> <https://www.gov.scot/publications/child-chance-tackling-child-poverty-delivery-plan-2018-22/>

<sup>11</sup> <https://www.gov.scot/news/no-real-change-in-fuel-poverty-in-2017/>

<sup>12</sup> <https://www.gov.scot/policies/home-energy-and-fuel-poverty/>

will be taken into consideration by the Scottish Government as they develop the Housing to 2040 route map.

Table 1.1 provides details of the 202 respondents included in the analysis broken down by individuals and organisations.

**Table 1.1: Breakdown of respondents by individuals and organisations**

Category	Number of respondents	Percentage of respondents
Individuals	28	14%
Organisations	174	86%
<b>TOTAL</b>	<b>202</b>	<b>100%</b>

Table 1.2 provides further details of the responses, with organisational respondents broken down by type of organisation.

**Table 1.2: Breakdown of respondents with organisational respondents classified by type of organisation**

Category	Number of respondents	Percentage of respondents
Academics	3	1%
Architects, design/development organisations and professional/umbrella organisations	27	13%
Agencies, advisory groups and other national bodies	15	7%
Health and social care bodies and professional/umbrella organisations	12	6%
Local authorities	27	13%
Local third/community sector organisations	20	10%
National third sector organisations	35	17%
Private companies	11	5%
Private landowners	2	1%
Registered social landlords	18	9%
Trade associations	4	2%
Individuals	28	14%
<b>TOTAL</b>	<b>202</b>	<b>100%</b>

Table 1.3 provides a breakdown of the number of responses to each question.

**Table 1.3: Responses to each question broken down by individuals and organisations**

	Individuals	Organisations	Total responses
Question 1	22	144	166
Question 2	15	99	114
Question 3	21	127	148
Question 4	18	124	142
Question 5	22	124	146
Question 6	17	113	130
Question 7	21	122	143
Question 8	11	94	105

Appendix 1 provides a full list of organisational respondents.

The responses received to this consultation were, in general, high quality. Respondents provided detailed, balanced and relevant information.

There was also a high level of consensus and commonality in the views expressed across different types of respondents. Although respondents suggested a wide range of ideas and proposals, and some identified challenges unique to rural communities, there were no significant variations or disagreement in responses between sectors.

### **Stakeholder consultation events**

The 15 stakeholder consultation events facilitated by the Scottish Government were held in towns and cities across Scotland. Some of these events were targeted at specific sectors and stakeholders while others were open to the public to attend.

### **Analysis of responses**

The responses were downloaded from Citizen Space and uploaded into qualitative analysis software NVivo. An initial review of the responses allowed us to generate broad themes that responses related to. We then coded responses into relevant themes and sub-themes and produced the analysis presented in this report.

The consultation document asked respondents to make detailed suggestions in response to Questions 3 to 7 under a series of suggested headings including:

- Who needs to make it happen and what type of action is required? E.g. facilitation, regulatory, financial, infrastructure, training etc.
- How much it costs and who will pay?

- Who is needed to do the work (workforce)?
- How long the proposal would take to implement and whether it is a temporary or permanent measure?

It is important to note that most of the responses did not provide the high level of detail requested in the specific questions noted above, although respondents did provide many practical and innovative suggestions which have been included in our analysis.

The responses provided to this consultation are entirely qualitative, and as such we have undertaken a qualitative analysis. While our analysis has not been quantitative, we have used terms to indicate the prevalence of certain viewpoints or suggestions. The following provides definitions of the approximate proportions we are referring to when we use these terms:

- |  |                                     |   |
|--|-------------------------------------|---|
| • <b>All</b> - 100%                      | • <b>Many</b> - more than half      | • <b>A minority</b> - less than one-fifth |
| • <b>The majority</b> – over four-fifths | • <b>Some</b> – one fifth to a half | • <b>A few</b> – up to five.              |

## The report

The following chapters in the report correspond to the seven questions asked in the consultation:

- Chapter 2 - Do you have any comments on the draft vision and principles?
- Chapter 3 - Do you have any comments on the scenarios and resilience of the route map or constraints?
- Chapter 4 - Do you have any proposals that would increase the affordability of housing in the future?
- Chapter 5 - Do you have any proposals that would increase the accessibility and/or functionality of existing and new housing (for example, for older and disabled people)?
- Chapter 6 - Do you have any proposals that would help us respond to the global climate emergency by increasing the energy efficiency and warmth and lowering the carbon emissions of existing and new housing?
- Chapter 7 - Do you have any proposals that would improve the quality, standards and state of repair of existing and new housing?
- Chapter 8 - Do you have any proposals that would improve the space around our homes and promote connected places and vibrant communities?
- Chapter 9 – Conclusions

Responses to the 'any other comments' question have been incorporated into the analysis of the other questions where relevant.

# Analysis of Question 1. Do you have any comments on the draft vision and principles?

It should be noted that some of the comments presented in this section will have been based on the vision and principles leaflet<sup>13</sup>, which is an abbreviated version of the full draft vision and principles document.

In general, the responses to this question were quite positive, and the draft vision and principles were broadly supported by respondents. Comments from those who were supportive of the draft vision and principles included praise for the clarity and breadth of the document and its aspirational and ambitious vision.

“Overall the draft vision provides a clear indication of what the housing system needs to provide, in order to meet people’s needs. There is very little to disagree with in terms of the vision.” - *Local authority*

Some respondents had reservations about how realistic and achievable the aims were given the challenges faced by the housing sector. A few expressed concern that the Scottish Government has set ‘unrealistic targets’ and has not fully set out how the principles and vision will be achieved.

Some respondents suggested that if the aims are to be achieved, this would require a multi-level collaborative approach to housing.

“Translating this ambitious vision into reality by 2040 will require partnership, courageous collaboration, resources and creativity – moving beyond traditional silos to seek stronger outcomes.” - *Registered social landlord*

A minority thought there were not enough references to those with disabilities or long-term health conditions in the draft vision and principles. They suggested the vision should include a section which addresses the specific needs of groups such as wheelchair users and people with dementia.

Respondents also provided feedback on each of the individual visions and principles. This feedback is presented throughout the remainder of this chapter under the four headings which correspond to those set out in the draft vision and principles:

<b>A well-functioning housing system</b>	<b>High quality sustainable homes</b>	<b>Homes that meet people's needs</b>	<b>Sustainable communities</b>
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<sup>13</sup> <https://www.gov.scot/binaries/content/documents/govscot/publications/factsheet/2019/06/housing-to-2040/documents/housing-to-2040-shorter-discussion-document/housing-to-2040-shorter-discussion-document/govscot%3Adocument/main-final-spread.pdf>

The analysis presented in this chapter is based on comments made specifically about each of the draft visions and principles.

## A well-functioning housing system

### The vision

There were several comments about the vision for a well-functioning housing system but most respondents opted to give feedback on the individual principles.

Of those that did comment on the vision, their responses were generally positive and included some suggestions about enhancing the language used in the vision and accompanying statements. For example, a few respondents suggested that the 'Finding the right home' section should also acknowledge the importance of maintaining a home that meets the owners' needs.

### **Principle 1: The housing system should supply high-quality affordable homes for living in, to shift the balance away from the use of homes as a means to store wealth.**

There was mixed feedback on Principle 1. Some respondents embraced the proposal to shift the balance away from homes as a means to store wealth. They felt that this would achieve stabilised house prices and were positive about the proposed people-centred approach to housing, rather than a market-driven approach.

However, others expressed concern over the implications this would have on those who rely on housing investments, for example those who have chosen to invest in housing as a means of supporting themselves through retirement.

“This could potentially suggest some unnecessary market intervention. It also fails to take account of the fact that building and storing wealth, through the main asset of a home, has served many people well; as housing has proved to be a stable investment. People have been able to release equity to fund retirement and reduce reliance on the state.” - *Architects and design/development organisation and professional/umbrella organisation*

A minority of respondents sought clarity on some of the language used in Principle 1, for example 'means to store wealth' and 'affordable'. One felt that care should be taken not to confuse the term 'affordable homes' with 'affordable housing'.

### **Principle 2: Government policy (including taxes and subsidies, for example) should promote house price stability, to help underpin Scotland's standard of living and productivity and promote a Fairer Scotland.**

There was no clear consensus in the feedback provided on Principle 2. A minority of respondents drew attention to the lack of suitable housing supply and how this was a key factor in addressing house price stability.

“Our members are firmly of the view that the current pressure on the housing market is driven by a lack of supply across all tenures. While this leads to perceived conflict between tenures/uses, it masks the underlying issue to which the only solution is a step change in the supply of new dwellings.” - *Architects and design/development organisation and professional/umbrella organisation*

A few respondents raised concerns about the effect that increased government involvement would have on the operation of the housing market. Respondents felt that this could lead to negative financial and economic consequences such as a suppressed market in some areas.

“While this shouldn’t hold Scotland back in continuing to pursue more progressive housing policy there must be appreciation of the potential wider implications. For example this could potentially lead to further financial/ economic issues if banks and investors continue to invest money purely on the basis of greatest financial return, as opposed to pursuing more ethical and sustainable investment policies.” - *Local authority*

One respondent had concerns that Government intervention to increase the amount of homes being built could lead to inflationary tendencies and workforce capacity issues with local contractors.

Local authorities and other organisations representing rural and island areas were pleased to see consideration given to rural areas in this section of the strategy. However, one respondent felt it was important to recognise that not all rural communities experience the same issues with regard to the housing sector.

“The housing market in Skye is immensely pressured with a number of supply and demand factors leading to house price inflation and problematic access for lower income household. On the other hand, parts of Sutherland have lower demand issues.” - *Local authority*

**Principle 3: Everybody should be able to save for the future (as well as be secure in their home and make significant changes to it) whether they rent or own.**

Many respondents agreed that it was important to be able to save for the future, regardless of tenure. However, some disagreed that homeowners and tenants, especially those on low incomes, would have the ability to save for the future or improve their homes.

A minority of respondents described innovative ways in which this could be addressed.

“Hybrid approaches could provide opportunities to combine an ownership/investment stake with renting, whereby households could invest in a collective housing scheme with a secure tenancy to allow for saving over time.” - *Private company*

“Our Rent to Buy Scheme - where the tenant saves for their deposit through an element of their rent and they purchase the property at a previously agreed price (with no link to increase in market value) at 5 years - has proved immensely popular.” - *Private company*

Others made comment on how it was not always possible for significant changes to be made to housing stock in some cases, for example where there are legal or financial barriers or limitations related to ownership.

**Principle 4: Housing provision should be informed by whole life economic costs and benefits in the round and help to address inequalities in health, wealth and education.**

Feedback on Principle 4 was positive, with many respondents highlighting the importance of considering whole life costs in housing provision. Others applauded the principle as broad and well-rounded, taking into account the upfront build cost, running costs and environmental impact of new homes.

It was recognised that considering whole life costs in housing provision would ultimately reduce costs for public services such as health and social care.

A minority of respondents felt that it should be more explicit that whole-life economic costs include environmental costs such as carbon costs, and that environmental benefits should have more credence in this principle.

## High-quality sustainable homes

### The vision

The main comment about this section from some respondents was the need for more focus on the importance of retrofitting sustainability measures in existing homes. They felt that it is crucial to include references to energy efficiency and low carbon measures that can be retrofitted in existing homes.

“It is also crucial that energy efficiency and low carbon retrofit is highlighted throughout the statement, so we encourage deeper and wider integration of low and zero carbon ambitions.” - *Local authority*

**Principle 5: Tenure-neutral space and quality standards for new homes (and existing homes where possible) should be set specifically to improve and protect quality of living and of place.**

A minority of respondents provided specific feedback on Principle 5 and for those that did, their comments generally supported this principle. However, a few felt that this part of the strategy was already addressed through existing Building Standards Regulations.

A few of the respondents expressed concern over the cost implications of applying new space and quality standards to existing homes.

“To attempt to introduce retrospective space and quality standards to existing homes would be extremely difficult to implement, and costly to administer and control at local government level. Additional local government resources would need to be employed and funded and it could create a negative impact on the housing market.” - *Architects and design/development organisation and professional/umbrella organisation*

Two respondents felt that it was important to include a reference to environmental standards relating to low carbon energy and heat supplies.

**Principle 6: Government policy should promote a greater diversity of home builders and broader availability of land for development to reduce prices and improve building quality.**

There was no clear consensus in responses to Principle 6. Some of those who provided feedback supported this principle, agreeing that the Scottish Government has an important role to play in promoting greater diversity in the supply chain and in making land available for development.

A minority of respondents commented that there has not been enough consideration given to barriers to competition in the construction market, for example issues around public sector procurement regulations, contractor capacity and cost. In rural areas in particular, factors such as the number and capacity of contractors, and additional costs associated with travel and accessibility of sites which limit contractor availability and market competition.

A few others thought that Principle 6 did not focus enough on environmental issues, and that in order to address the climate emergency, there needs to be an improvement in minimum environmental standards of new and existing housing.

“Building quality at even the most basic level should be fit for the 2050 climate mitigation and adaptation standards, we should not be building a future retrofit burden as that will reduce economic, health and environmental benefits from now until they are finally delivered, undermining all other aspects of a vision for a better future.” - *Local authority*

Furthermore, one respondent felt that the statement ‘Developers offer a real choice and new homes are customised to the first occupants’ wants and needs’ should include a caveat with a minimal energy standard of the energy consumption of all homes.

**Principle 7: All tenures should apply the same high quality and safety standards and levels of consumer protection.**

There were limited comments made about Principle 7. Some respondents expressed support for this principle and agreed with the need for high quality and safety standards and levels of consumer protection, and noted that conversely, poor quality development standards will have widespread negative consequences in the future.

However, others expressed concern over the following statement: ‘Homes that cannot reasonably be adapted to meet the standards (taking account of technical feasibility and cost effectiveness) are considered for demolition or are repurposed’, specifically the reference to demolition. A few respondents questioned the circumstances under which homes could be demolished. Others felt that demolition of homes could be counter-productive in meeting net-zero carbon targets.

“The statement...should be treated with extreme caution. Energy Performance Certificate (EPC) ratings do not, at present, accurately rate many traditionally built properties.” - *Local third/community sector organisation*

“Demolition/Repurpose – very broad. Can your home be taken off you if you don’t agree to standards? Definition would need clarification.” - *Registered social landlord*

**Principle 8: New homes for sale should be built to high standards, defects should be identified and remedied quickly and all owners should be required to maintain the condition of their home.**

Most respondents supported Principle 8. Some pointed out specific elements of the principle that they agreed with, such as the emphasis on the quick identification and remedy of defects in housing, the principle that all owners be required to maintain the condition of their home and that the Scottish Government has an important role to play in promoting high quality and safety standards.

However, a minority of respondents noted that they felt that high standards should be applied to all new homes from across the three main housing tenures, not specifically new homes for sale.

A few respondents felt that the phrase ‘sometimes required’ in the accompanying descriptor was not strong enough and would not drive behaviour change.

“The statement that people are ‘encouraged, sometimes required, to cooperate over communal repairs’ should be strengthened so that participation in communal repairs is not an option and all properties in such situations should be required to appoint a property factor for the management of property repairs.” - *Local authority*

**Principle 9: Decisions around the quality, location and utilisation of existing stock and new build should be ambitious in enhancing biodiversity, promoting Scotland’s energy security, and be consistent with the target for Scotland’s emissions to be net zero carbon by 2045.**

Some respondents expressed strong support for Principle 9, describing it as ‘excellent’ with particular support for the statement that ‘New build homes are built so that they are net zero carbon (i.e. built to high standards of energy efficiency and use renewable heat or very low carbon heating)’.

However, there were others who felt that fuel poverty was not sufficiently addressed in this principle, given the increasing number of households facing extreme fuel poverty in Scotland. They suggested that further effort needs to be made to tackle

this. One participant suggested that having a warm home and how this impacts on people's health should have its own principle.

A few suggested that the principle's main focus should be changed, or that new factors should be considered as part of Principle 9. There was no consensus on the changes that should be made, and examples of individual suggestions are given below:

- More focus should be placed on creation of sustainable heating in homes
- Include a reference to proposed regulatory requirements to achieve specific energy performance targets
- Consider the development of net zero carbon communities, not just individual homes
- Include a reference to water efficiency

## Sustainable communities

### The vision

Most of the feedback on 'sustainable communities' was positive. They recognised the importance of achieving sustainability and the vision was described as aspirational. A few respondents were pleased to see a specific reference to flood and storm resilience.

"We welcome the ambition for flood resilience and would encourage that to be strengthened for provision of homes that can withstand extremes of temperature and are resilient to storm damage, not just flooding." - *Local authority*

**Principle 10: New housing, and the required community resources, should only be provided where they help to create safer, stronger, attractive, sustainable and integrated communities.**

There were limited comments made about Principle 10 but those who did respond showed clear support and felt the proposals in Principle 10 were to be commended. A few respondents drew attention to the important role of collaboration between planning and other policy areas in building infrastructure to create safer and stronger communities.

**Principle 11: Local communities should be empowered to respond to housing need in their area, as part of a coherent regional economic approach (creating and maintaining jobs) and supported by provision of the right infrastructure.**

Principle 11 was welcomed by many respondents who were pleased to see that the importance of community involvement was recognised in the approach to housing.

Participants supported the notion that local communities should have input into determining local housing needs.

“Community engagement is a key part of major development and should be meaningful, timely and efficient.” - *Architects and design/development organisation and professional/umbrella organisation*

As well as community involvement, a few stressed the importance of collaboration in achieving this principle, specifically supporting a cross-sector, joined-up approach to housing.

**Principle 12: Government intervention should help existing and new communities to be physically, digitally, culturally and economically connected within a coherent geographic region; this includes retaining and attracting vibrant communities in areas facing depopulation.**

Principle 12 attracted positive feedback from many respondents. Several endorsed the principle for addressing of the role of the Scottish Government in supporting and regenerating communities across Scotland.

Although many were supportive of Principle 12, some expressed doubt over how achievable this would be and noted some barriers to its implementation.

“Although it is always preferable to house people near work, education and other services as set out in principles 11 and 12, high demand areas in a market-led system are likely to prevent this from being attainable on every occasion.” - *Local authority*

Others felt there would be challenges achieving this principle in rural areas, where there are wide range of complex reasons why people may move away from the area.

## Homes that meet people's needs

### The vision

Feedback was limited about the vision overall although the majority of respondents commented on the individual principles contained within the vision. A few respondents suggested that the reference to veterans in the ‘my rights’ statement should be changed to include other protected groups who may require additional support, for example care leavers, ex-prisoners or those with additional needs.

**Principle 13: Government should ensure that there are affordable housing options across Scotland for households at all income levels.**

The majority of respondents agreed with Principle 13 and supported the objective to provide fully sustainable communities across Scotland.

“We fully endorse this statement and believe that development in large conurbations, providing multi tenure residential led large scale regeneration projects which are suitable for a wide variety of end users and customers, creates better places.” - *Trade association*

However, a minority felt that the statement did not go far enough or contain sufficient detail, describing it as too simplistic and lacking explicit detail on low carbon sources of heat and power. One felt that the term ‘affordability’ in this principle could be extended to “affordability including running costs”.

A few were critical that the principle seemed to suggest that only those at the higher end of the income scale were able to afford the home of their choice. They felt an element of choice in housing is important and should not just be reserved for ‘households at the higher end’ of the income distribution.

“While it is acknowledged that assistance is given through the provision of social rented housing and assistance with housing costs on the basis of need, the wording of Principle 13 could be improved to recognise the importance of households across all income groups being able to exercise choice.” - *Local authority*

**Principle 14: Housing and the housing market should be highly flexible to enable people to meet their changing needs.**

This principle was welcomed by many respondents. The reference to supporting ‘the diverse people of Scotland’ was received particularly well by some respondents. Many respondents also agreed that adaptability of homes will enable people to live longer in their existing communities.

Some respondents highlighted the importance of ensuring flexibility in new builds and future-proofing homes. Smart design solutions, such as wider door thresholds and wet room flooring in bathrooms were identified as ways in which housing can meet demand in the future.

Further examples of this are included in our analysis of Question 4, “Do you have any proposals that would increase the accessibility and/or functionality of existing and new housing (for example, for older and disabled people)?”

**Principle 15: Everyone has a right to an adequate home**

The majority of responses to this principle were positive. The respondents who commented on this principle unanimously agreed with its sentiment and appreciated that housing was being recognised as a human right.

“Housing as a human right should be the foundation of housing policy and the starting point for setting out our ambitions for our housing system.” - *National third sector organisation*

A recurring suggestion about Principle 15 was that it should appear earlier in the list of principles. Some respondents suggested it should be the first principle in this list.

A few respondents had reservations about the choice of the phrase 'adequate home' and felt it should be replaced with more 'ambitious' language, for example 'housing which is affordable and meets all statutory standards'.

## Analysis of Question 2. Do you have any comments on the scenarios and resilience of the route map or constraints?

Respondents' comments on the scenarios and resilience of the Housing to 2040 route map or constraints were disparate, with mixed views expressed within all respondent type. There were no obvious trends or preferences by sector interest.

This makes it difficult to identify areas of consensus and disagreement. However, we have presented below the feedback from the respondents structured under each of the drivers and any constraints noted, where there was sufficient comment provided to enable this.

Some provided suggestions to add to or modify the list of drivers of change, while others provided comments and suggestions related to how housing policy could respond to these challenges. We refer to both types of response below.

### Overarching comments about the drivers for change and constraints

Some respondents expressed agreement with the drivers for change and constraints laid out in the route map and, in some cases, made little further comment.

*“These seem to be well considered and comprehensive.” - Architects and design/development organisation and professional/umbrella organisation*

However, a minority of respondents commented that they would like to see more details about the drivers for change and constraints and how they will affect the Housing to 2040 vision.

### Driver for change: Population and health

#### Ageing population

Some respondents commented on Scotland's ageing population and the challenges this poses for the housing system, most notably the need to ensure that housing can be adapted to meet people's needs as they become older.

*“An ageing population brings growth in more complex health needs and co-morbidities, coupled with the policy of shifting the balance of care to the communities, flexible and adaptable housing that meets the changing needs of tenants over their life cycle will be essential to delivering a sustainable health and social care system of the future.” - Local authority*

A few others discussed innovative approaches to housing and construction, including self-build and co-housing models, as a way to provide housing that can be adapted to people's changing needs as they get older.

“A home for life should be an option, with properties with the capacity to be adapted, maybe a modular type of building that can have the ability to be added on to as a design feature.” - *Local third/community sector organisation*

A few noted that alternative housing models such as co-housing<sup>14</sup> and collective self-build<sup>15</sup> have the potential to address social isolation among older people.

“Also co-housing projects which are mutually supportive can help to combat loneliness and isolation in older age, allowing individuals to stay in their homes for longer.” - *Architects and design/development organisation and professional/umbrella organisation*

“Collective self-build and co-housing can address the increase in smaller households and an ageing population which requires more support to combat loneliness and financial constraints.” - *Private company*

A few referred to the concept of intergenerational living and we include more details about this below.

### **Single person households**

A few respondents commented about the increasing proportion of single person households, and referred to the potential of different housing models such as co-housing and collective self-build to respond to this trend.

“The statement ‘More single person households’ should include the caveat that many single people may not choose to live alone. More options should be explored to enable people to co-habit either in specifically designed co-housing or as single sharers within a better-regulated private rented sector or within affordable (social or mid-market rent) housing.” - *Registered social landlord*

“Co-housing (not to be confused with co-living) and collective self-build allow for independent living and private space alongside active community interaction – once more addressing loneliness and isolation.” - *Architects and design/development organisation and professional/umbrella organisation*

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<sup>14</sup> <https://cohousing.org.uk/about/about-cohousing/>

<sup>15</sup> <https://ruralhousingscotland.org/collective-self-build-2>

A small number referred to inter-generational living<sup>16</sup>.

“By creating inter-generational community projects in new communities we are also tackling loneliness which is important as homes becomes single person households. A key reason to bring communities together and to trial intergenerational co-housing is the ageing population. As we get older it is more important than ever that we are closely connected to our neighbourhood and our community, so anything that stimulates connection can help.” - *National third sector organisation*

### **The gap between life expectancy and healthy life expectancy**

A minority of respondents noted the difference between life expectancy and healthy life expectancy, and made comments about the housing needs of people with disabilities and long-term health conditions. These respondents commented on the importance of ensuring that housing is accessible for disabled people.

“The effects of an ageing population and the gap between life expectancy and healthy life expectancy inevitably means that increasing numbers of people will be living with a disability. Consequently, much more accessible housing will be needed.” - *National third sector organisation*

This respondent went on to comment that Housing to 2040 should have more focus on accessible housing.

“Section 3 does not address disability or accessibility in any way... Perhaps this is implied from the bullet points included in Section 3... but this is not enough - it must be explicit here, and throughout the Housing 2040 Strategy, in a clear and transparent way. Section 4, under constraints, point 4.3 states ‘adaptations of (some) existing homes to make them more accessible for disabled persons and appropriate for an ageing population.’ This seems non-committal and unambitious when making housing more accessible should be at the heart of Scotland’s Housing 2040 Strategy.” - *National third sector organisation*

We discuss responses related to the adaptability and accessibility of housing for older and disabled people more fully in our analysis of Question 4.

### **Depopulation**

A few respondents made comments related to the unknown impact of Brexit on depopulation in response to this question.

“There are obviously huge areas of uncertainty over what Brexit will mean, not least in the labour market and on our need to grow the Scottish population through inward migration.” - *Agencies, advisory groups and other national bodies*

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<sup>16</sup> <https://www.housinglin.org.uk/blogs/Intergenerational-living-its-scope-and-potential/>

A few comments referred specifically to rural areas and depopulation. Issues identified by these respondents include a lack of affordable housing, made worse by empty and second homes, and difficulties with infrastructure including transport and access to services. These respondents felt that these challenges could lead to people moving away from rural areas, or deciding against moving to these areas.

“We need to balance the natural urban drift of population with the need for sustainable rural communities. Inward migration to Scotland as a whole is needed, but specifically, inward migration or at worst population preservation is vital in rural areas.” - *Registered social landlord*

“People who live in these rural areas can experience difficulties with transport, access to services and rural deprivation. Rurality also presents challenges in the delivery of housing with care and support to people, for example, a workforce limited in size. This can result in people moving away from the community they have lived in for many years and are well connected to.” - *Health and social care body or professional/umbrella body*

A few of these respondents noted that the needs of rural areas must be considered when planning housing policy. One referred to the needs of island communities specifically, suggesting that the scenarios and resilience should include a reference to the Islands Act and the need for policies to ensure that impacts on island communities are fully taken into account

## **Driver for change: Political**

### **Political leadership and collaboration**

There was a clear sense from some respondents that, in order to achieve the Housing to 2040 vision, the Scottish Government needs to provide political leadership.

However, it was emphasised the cross-cutting nature of housing policy, and the need to collaborate with national and local governmental agencies in many other policy areas in order to deliver a whole system approach to housing.

Some respondents identified various other policy areas where housing can have an impact, and that impact on housing. These include health inequalities, child poverty, human rights and climate change. A few respondents emphasised the need to ensure that the Housing to 2040 route map takes into account, and is joined up with, policies in these other areas.

“The links between housing and other areas of the public sector should be made more explicitly by the Scottish Government, highlighting that a safe and secure home is at the cornerstone of achieving prosperity and equality.” - *Local authority*

Others acknowledged the importance of learning from the experience of other policy areas to inform the development of the route map.

“[We recommend that the Scottish Government] builds the broadest consensus possible beyond politics to include the whole housing landscape while also building in flexibility to take account of the unknowns, and to learn from previous experience from other policy areas including social security in terms of use of language and involving people with lived experience.” - *National third sector organisation*

Some respondents also referred to collaborating with other agencies in the public and private sectors to leverage enhanced funding for housing, and we discuss this later in this chapter in the section about constraints related to finances.

## **Driver for change: Economic**

### **Greater financial innovation**

A minority of respondents suggested that new forms of funding, including grants for energy efficiency improvements, should be considered.

“If grants were given to help owners, private rented sector and local authorities to enable them to install energy efficiency items such as solar panels, insulation etc. then the money saved is likely to be used in the local economy.” - *Individual*

One went into further detail about the importance of creating new funding streams over the next few years.

“Given the current and expected future economic context, in the short to medium term a firm focus will need to be given to generating new and innovative forms of funding set out, led at the national level. To sustain current planned investment in homes and infrastructure, there needs to be a recognition that any major drop off in current funding streams will have a negative effect on intended programmes post 2021. There are also issues of resilience in terms of the unknown impacts at this stage of Brexit, workforce and the UK context.” - *Local authority*

### **Availability of housing**

A few respondents commented on issues such as short-term and holiday lets and the increase in student housing and the impact these are having on the availability and affordability of housing. Two suggested specific drivers of change – the impact of the tourism sector, and the impact of student accommodation - that could be added to the route map.

“Under ‘Economic’ there should be reference to the impact of the tourism sector on housing availability. Short-term letting is a serious issue which needs addressing immediately, especially in Edinburgh (and Leith in particular). It is appreciated that the tourism sector needs a supply of holiday homes but this puts additional pressure on the availability of properties for longer-term letting and drives up house prices.” - *Registered social landlord*

“Include a separate section on Education, including student accommodation and the growth plan for the higher/further education sector. The proliferation of student housing has been putting additional stress in already pressurised places like Edinburgh and could result in over-supply in the longer-term.” - *Registered social landlord*

## Driver for change: Technology

Comments around technology focused on the need to ensure access to high-speed internet for communities across Scotland, particularly around the potential of new internet-based technology to enhance health and care systems.

“The provision of superfast connectivity to home through FTTP, 4G/5G networks, coupled with the mainstreaming of smart homes, eHealth facilities and home working will place higher demands on all networks. All private digital connectivity providers must be included in the future planning of Scotland’s wider infrastructure agenda.” - *Architects and design/development organisation and professional/umbrella organisation*

“Increasing demand and reducing resources is driving the increased use of Technology Enabled Care. The infrastructure of housing needs to be able to support this.” - *Health and social care body or professional/umbrella body*

A few respondents noted that affordable internet access is particularly important in rural areas.

“All areas, especially rural areas, should have access to cheap internet. If the rural areas get left behind, it will make it hard for businesses, both tourism and technical, to compete on an even basis with businesses in urban areas.” - *Individual*

## Driver for change: Transport

Responses to Question 2 indicate respondents’ support for developments in active and sustainable transport, and this is an issue we discuss in more detail in our analysis of Question 7. Comments from some respondents focused on an enhanced focus on walking and cycling, and reduced reliance on cars.

“Encouraging more walking and cycling will help improve the health of the population however there is a requirement to consider the needs of the frail, vulnerable and disabled population when designing transport solutions.” - *Health and social care body or professional/umbrella body*

Others identified the emergence of electric vehicles and the importance of ensuring that Scotland has the energy infrastructure to support increased use of this technology.

Challenges around transport provision in rural communities, especially the reliability and affordability of public transport, emerged as a distinct theme in comments from a few respondents.

“In rural areas public transport is dire, so there is a great reliance on cars. In some areas volunteers act as drivers to get people to medical appointments, or leisure activities. The groups who arrange this are always looking for funding so that the volunteers can be reimbursed for their expenses and the customer does not have to pay a huge amount... If the SG could support volunteer groups with a base grant, then it would not cost the taxpayer as much as improving the bus service and would enable the groups to operate with certainty and not have to spend time looking for funding to survive.” - *Individual*

## **Driver for change: Energy and climate change**

Many respondents recognised the importance of adapting housing to improve its energy efficiency and contribution to the response to climate change.

“The use of new technologies should be embraced in future home design to reduce energy use and increase efficiency in energy use.” - *Local third/community sector organisation*

“A key driver of change affecting Scotland’s housing delivery is the current climate emergency and target of achieving net zero emissions by 2045. This creates a pressing requirement for us to care for, maintain and re-use of our existing buildings and places, recognising that the energy and carbon used in their manufacture and construction has already been spent.” - *Agencies, advisory groups and other national bodies*

We discuss energy efficiency and climate change in more detail in our analysis of Questions 5 and 7.

## **Additional driver: Housing as a human right**

A minority of respondents felt that the drivers for change should recognise that housing is a human right.

“We would suggest that additional drivers could include the growing awareness of human rights as an issue in housing policy and outcomes and the realisation that in human rights terms the current system performs poorly at best.” - *National third sector organisation*

## Constraints: financial

Some respondents commented that more information needs to be provided about the costs of achieving the Housing to 2040 vision and how this will be funded, with a sense that financial resources will be required from the Scottish Government to support local authorities in delivering the vision.

“More information needs to be produced on how the ambitions for Housing to 2040 will be funded. There are more expectations on delivering services within local authorities without any proposals for increases in staff or funding. There are serious questions to be asked about how this will be resourced. We need clear direction from the Scottish Government and further clarity and information on how this is going to be funded.” - *Local authority*

“The ability of the Housing to 2040 vision to be implemented is dependent upon adequate and long term funding commitments for housing and other related areas such as care, health and also national and local infrastructure to enable new housing developments to be realised.” - *Local authority*

“Common sense dictates more Scottish Government funding and higher HAG (Housing Association Grant) percentages will be required if the ‘Vision’ is to have any chance of being achieved.” - *Registered social landlord*

A few felt that the aims of the vision were unaffordable.

“The consultation states that the total cost of this work is going to cost over £100 billion over the twenty-year period, which amounts to £5 billion per year. This figure is far above the Scottish and UK Government’s budget for housing in Scotland of £2.6 billion per year. While the consultation acknowledges finance as a constraint, the reality is that without the appropriate funding, the aims are unfeasible.” - *Private landowner*

“There is also a clear constraint in achieving some of the aims, from the total amount of money in the economy. Many of the aspirations assume a transfer of funding responsibility to individuals. It is not clear where these funds are to come from, whilst an assumption that loans and borrowing may provide a solution seems somewhat unrealistic.” - *Local authority*

A few others, however, noted that positive outcomes can be achieved in other policy areas, such as health, as a result of investment in housing. There was a feeling among these respondents that recognising this, and working in collaboration with local and national agencies from other policy areas, could help to leverage additional funding for housing.

“The preventative value of housing, in relation to health and wellbeing outcomes, and the spend to save argument, in terms of investment in housing to support better health and wellbeing outcomes requires a collaborative approach at a national and local level. At a local level an outcome rather than service-based approach to budget setting and planning will support this aim.” - *Local authority*

“The council recognises the scale of fiscal requirements identified to achieve real change, particularly when considering a whole housing systems approach. This should be balanced with emphasis on the strong evidence that demonstrates investment in housing leads to improvements in a wide range of other sectors.” - *Local authority*

“Links between housing and other public sector spending must be considered in different ways with the understanding and recognition of the contribution housing can make to health, education and criminal justice budgets.” - *Local authority*

In addition, a few respondents suggested collaborating with the private sector to secure investment in the infrastructure necessary to support the aims of Housing to 2040.

“Unless a collaborative approach to delivery of infrastructure is created between the state and private sector then the route map will not be delivered. Scotland's infrastructure is creaking already and without significant investment cannot be funded by private developers as they build in many parts of regional Scotland (where) land values are insufficient to fund the infrastructure required.” - *Individual*

A minority of respondents, in response to this question and others, suggested ways in which increased private sector funding could be leveraged. These ideas included:

- the Scottish Government providing housing associations with long-term financial investment from the Scottish Government, which could help housing associations to leverage private finance;
- reviewing the taxation system related to conservation, maintenance and repair work, especially VAT, which can act as a disincentive to private developers funding the conservation or renovation of existing buildings;
- reviewing taxation arrangements for private landlords – while a few respondents recognised the need to reduce investment in second homes and buy-to-let properties, a few others noted the importance of the private rental sector and that the taxation system can discourage landlords from acquiring or renovating properties;
- exploring models such as co-operative and community-led housing which a respondent suggested can attract private investment through models such as ‘loan stock’ which the respondent noted that private sector housing co-operatives have used to fund property acquisitions; and adjusting regulations in the mortgage industry to allow a higher price to be paid where it can be

demonstrated that properties have lower long-term running costs – this could encourage increased private sector delivery in the new build sector.

## Constraints: labour market

A minority of respondents made comments related to the labour market and these focused mainly on the need to address the skills and availability of construction and trades workers, particularly in the context of Brexit, the ageing population, and the need to attract more young people into the industry.

“We would agree with the points made on the labour market in terms of the reduction in its workforce size, skills and availability. Even today skilled construction tradespeople and indeed good construction companies are at premiums hence the increase in tender prices....Greater and more realistic financial support for firms taking on apprentices must be considered by the Scottish Government as a matter of priority. Smaller construction companies will also possibly need more financial support from the Scottish Government in this respect.” - *Registered social landlord*

“The section on labour market should also include the need to attract young people into housing as a profession, for example by the provision of more government funded further education and university housing courses and by the inclusion of housing as a standard item on primary and secondary school curriculums (e.g. as a module within Modern Studies or Geography).” - *Registered social landlord*

“Problems with reducing workforce generally but also leaving the EU. Consider more flexible working partial retirement, import workforce without restrictions. Modern apprentices in construction...There needs to be investment from government to support construction training as there are skill shortages in construction.” - *Agencies, advisory groups and other national bodies*

One commented that this is a particular concern in rural communities:

“We have raised our concerns regarding the lack of a skilled workforce in rural areas several times to the Scottish Government. It is heartening to see they have recognised this as a constraint. However, we feel they still underestimate the disparity in available contractors in rural areas as oppose to urban and how this will affect rural housing.” - *Private landowner*

A few respondents referred to potential constraints caused by limited capacity among construction companies in Scotland.

“A key challenge in delivering the Vision is the limited capacity of the Scottish construction sector, outside of companies who will build their own product to a sales programme. There are few contractors capable of taking on large scale housing development. Over 75% of affordable housing in Glasgow was built by just three contractors. Our members are concerned that this limited capacity could contribute to delays and constraints on output.” - *Architects and design/development organisation and professional/umbrella organisation*

## **Analysis of Question 3. Do you have any proposals that would increase the affordability of housing in the future?**

Respondents provided detailed responses to this question and made a series of suggestions for increasing the affordability of housing in the future.

Key issues raised included:

- Clarity is required over the definition of 'affordable' in relation to housing;
- The importance of increasing the supply of affordable housing;
- Improving and maximising the use of public sites;
- More focus on affordability in rural areas;
- Increasing the use of innovative construction methods;
- More support for house buyers/home ownership;
- Changes in taxation, specifically Land Value Tax and LBTT.

A more detailed analysis of the responses to this question is provided throughout this chapter.

### **Defining affordability**

Many respondents referred to the need to define affordability in relation to housing. This included calling for a national, legally agreed definition of affordability. One respondent, for example, felt that this would “encourage the market from across all three tenures to meet this, potentially leading to improved outcomes for residents”.

There was a recognition that affordable means different things in different areas of Scotland, and wages, circumstances, family compliment, age and disability are often drivers of affordability. As a result, some felt that the definition should be devolved to each local authority – enabling them to define affordability according to what the market was like in that area.

Some felt that affordability needed to be defined as a percentage of income, with a variety of suggestions for how this could be done, including measuring it in a similar way to fuel poverty; defining it as the monthly payment in rent or mortgage as a percentage of the national minimum wage, not as a median point in a broad rental market area dataset; and establishing a benchmark for what 'good' affordability would look like including all housing related costs.

### **Increasing supply**

The majority of respondents to this question noted that increasing the supply of affordable housing was key to affordability of housing more widely.

Supply of social rented housing was recognised to be a challenge in many areas, and the supply of housing that met additional needs (and was more accessible) was highlighted as an even more significant challenge.

To meet housing demand and avoid a worsening of the current homelessness crisis many felt that it was important not only to maintain, but to increase the rate of construction of new social homes from 2021 onwards.

Some respondents noted that any increased supply of housing needed to include housing across a range of tenures suitable to respond to changing demographics and social needs, which also considers the needs of our ageing population as well as how people choose to use and live in their homes.

However, some respondents also raised concerns about future budgets and noted the need to ensure that current levels of funding for housing are continued.

“... is extremely concerned by the implication in the consultation paper that current levels of government capital expenditure on social housing cannot or will not be sustained post-2021.” - *Agencies, advisory groups and other national bodies*

“We believe that current levels of funding must be continued as a minimum and we are concerned that investment in housing may not continue to be prioritised. We need increased investment in housing grants and allowances to enable providers to continue to develop energy efficient, affordable homes that will help Scotland achieve Net Zero as well as tackle the lack of affordable housing.” - *Registered social landlord*

A few respondents noted the importance of maintaining a rolling programme for the ongoing delivery of new build affordable housing and one respondent highlighted the need for Resource Planning Assumptions (RPAs) several years into the future.

“... to facilitate long term planning by councils and Registered Social Landlord (RSL) partners. Clarification on future funding would allow Councils and developing RSLs to produce realistic development programmes and plan for the longer term. Lead-in times, development staff capacity, construction workforce capacity and private finance could all become issues if there was a significant reduction in financial support for new build affordable development.” - *Local authority*

A wide range of suggestions for improving the supply of housing were made. For example, a few respondents suggesting measures such as increasing the grant support for registered social landlords who develop housing and introducing a fund for social landlords /social enterprises to buy homes on the open market to rent as affordable tenancies.

Some respondents made suggestions related to revisions to social security payments to better reflect actual costs to individuals. For example, one respondent suggested:

“Improving affordability in the private rented sector - housing costs payments through the social security system could be reformed to cover actual rents. This could involve action by the UK Government to increase local housing allowance returning it to at least the 50th percentile, or action from the Scottish Government to top up the housing costs payments that private renters can receive.” - *Health and social care body or professional/umbrella body*

Another suggested that there need to be increased scrutiny of rent levels across tenures with rents regulated using a formula on fair rents and profit.

A few respondents suggested the introduction of rent caps to limit future rent increases at the inflation rate, with some of these citing the success of this approach in other countries including Germany.

A stakeholder within the finance sector suggested introducing a public sector leasehold arrangement, with ground rent paid to the government. They felt the potential benefits would include a steady income stream to the government, and a lower upfront cost for the purchaser.

Some respondents also noted that transport costs needed to be considered as part of housing affordability, pointing out that, even if rent is affordable, if it costs a lot for public or private transport to access essential services such as shops, doctors, and schools then houses may be unaffordable.

In considering supply issues, some respondents suggested changes to targets for new housing, with one, for example, suggesting a housing target of 25,000 homes per year in Scotland, and another pointing to a Danish model which has strict allocations targets by district which limit the amount of private housing development that can take place until a certain proportion of social housing has been built.

Others suggested that Government should:

- Change financial regulations to allow local authorities to build affordable housing for sale, in addition to homes for rent.
- Design and build good quality houses that will last, but that can also be recycled when they come to the end of their usable lives.
- Encourage the use of more temporary, modular housing as a low-cost option to meet demand.

A number of respondents raised the issue of empty properties, with suggestions including introducing Compulsory Sales Order powers to tackle empty homes to help local authorities bring empty homes back into use; renovating empty homes and letting them through a social letting agency; and converting empty shops and buildings to regenerate town centres.

Some respondents also suggested measures involving financial support of some kind including continuing the financial support to the Affordable Housing Supply Programme (AHSP); public borrowing as a cost-effective way to fund new social housing; additional Scottish Government Housing Association Grant and access to

cheaper private finance (via the Scottish National Investment Bank if it were to go down that route).

Movement in the market was also considered to be an important element of affordability, with suggestions for change including providing incentives to older people to move and free up larger properties, as the current situation distorts the market and restricts free flow.

Another suggestion was to abolish Land and Buildings Transaction Tax (LBTT) (either altogether, for a fixed period of time to encourage movement in the market, or for downsizers).

One respondent suggested that shared equity is an effective mechanism to support people to buy a home, prevents them from being rented out and that it could enable the Scottish Government to share the benefits of housing wealth more redistributively by using Scottish Government shared equity stake returns to subsidise the building of more affordable homes.

A few respondents referred to the need to develop new forms of tenure, including in the Co-operative and Community-led Housing (CCLH) sector.

### **Maximising benefits of public sites**

Some respondents raised the issue of improved use of public sites to create opportunities for new housing to be built. A few referred to sites that had been sold to private developers which could have instead been used as an asset for the community. For example, in Edinburgh, an example was given of the conflict between the NHS and local community on a 45-acre site. The land was originally gifted to the community, for the wellbeing of the community. In the 1940s the NHS was given the land but now the NHS is looking to maximise benefit, meaning the site is more likely to be sold to a high-end developer than a community trust who would like to see mixed development including affordable housing. A few respondents felt that the community should get first option on land purchases such as these.

Others referred more generally to the benefit of releasing public land for building. One respondent, for example, referred to the NHS and Ministry of Defence owning a great deal of vacant land which could be used for the public good.

### **Affordability in rural areas**

Some respondents made specific reference to issues of affordability affecting rural areas. Some noted that in making housing more affordable account needed to be taken of more than just household costs – travel costs were considered to be a particularly important part of the equation in rural areas where people need to commute to work, access shops, travel for health care and so on.

“The Scottish Government and Local Authorities should do more to massively improve infrastructure and transport, to enable people to choose where they want to live and have easy access to education, training, schools, their places of employment, networks of support and essential services.” - *National third sector organisation*

Uplift on costs associated with construction was also highlighted as needing attention, particularly in relation to the islands. This uplift is passed on to the householder, which immediately makes the matter of affordability questionable, when compared with income and costs of building on the mainland.

A few respondents observed that there are often few suitable options for people seeking accommodation in rural areas, and therefore new build, affordable housing projects with relatively small numbers of units were felt to have a big impact on those communities' longer-term sustainability. However, some felt that grant levels are not high enough in most rural areas to support commercially viable housing development, an issue which becomes progressively more severe as the location becomes more rural and remote, and is evident through the low levels of RSL and private development in these disadvantaged areas. Some suggested that there is a need to more closely align Scottish Government investment levels with the actual, open book, development costs of these vital but small-scale projects.

A few respondents called specifically for more social housing in rural Scotland.

Concerns were raised about the lower availability of construction workers post-Brexit and contractor capacity being absorbed by larger more urban development projects which are more commercially attractive, at the expense of more marginal small-scale, rural developments. One respondent referred to growing evidence of difficulties in attracting a range of competitive quotes.

Some cautioned against a one-size-fits-all approach to building homes as, in a rural environment, the design of a house will often have to be site-specific in order to benefit from passive solar gain or defend against the prevailing wind.

Some respondents raised concerns about the levels of funding available through the Rural and Islands Housing Fund, including comments that this fund needs to be in remote islands to reflect additional build costs resulting from contractors travelling from other islands, and that the Rural Housing Fund and Island Housing Fund still does not have a high enough intervention level to make house building for Affordable Homes viable. One respondent felt that a one-size fits all approach was unsuitable for rural areas and that Government should recognise local circumstances more when deciding grant levels.

Others observed that the Rural and Island Housing Fund (RIHF) should continue beyond March 2021.

Some respondents also thought that grant subsidies or government supplying infrastructure for several properties would encourage building.

Some respondents raised issues particularly related to adaptable housing, noting that these cost more to build in rural areas, and that greater consideration needed to be applied to affordable home ownership – including, considering additional support for self-builders, and developing shell-houses in order for self-builders to fit-out.

Some respondents suggested more innovative approaches including going beyond the limited provision of support to single dwellings in rural areas and embracing support for models such as co-housing provision; and considering greenfield development as an option, with community benefit being weighed against planning considerations. Another respondent suggested there could be merit in supporting new entrants into crofting which offers a very effective mechanism to provide affordable housing, noting that the crofting system provides for croft house development at a very reasonable cost to the crofter (15 times the proportional croft rent, plus legal costs).

One respondent also suggested sense-checking all national and local housing and homelessness strategies for rural equity.

## **Use of innovative construction methods**

Some respondents suggested that more extensive use of innovative construction methods could be an effective way of improving the affordability of housing in the future. Frequently, these respondents suggested the use of modular design, factory builds, 3-D printed houses and off-site construction that would reduce costs, ensure environmental sustainability and be energy efficient. Respondents described building homes offsite as beneficial in terms of reduction in waste and improving predictability of delivery, which can translate into savings for residents and developers.

Some respondents raised concerns about the availability of finance for these innovative construction methods and one suggested a possible role for the Scottish National Investment Bank to help with initial funding and increasing the capacity of local manufacturing facilities for off-site construction. However, they also cautioned that for this investment to be low risk, there would be a need for a clear future pipeline of development with consistent standards, free from regulatory delays, that enables all those in the supply chain to have the confidence to invest.

Increasing options for self-build was also noted by a number of respondents as a means of improving affordability, with one respondent highlighting that a self-built house on average costs 20-30% less than one purchased from a developer, making it a more affordable option.

“Moreover, if self-build was recognised as a form of ‘affordable’ housing, developers could be required to service a proportion of plots for self-build (on large housing sites), to be sold at a discounted rate, in order to meet their Section 75 obligations. This would make building your own home even more affordable. In addition, Councils could service and remediate land on brownfield sites and sell these at an affordable price to those on their self-build Register.” - *Architects and design/development organisation and professional/umbrella organisation*

Collective self-build was also identified as a potential route to improve affordability – since it can enable people to negotiate better discounts and co-ordinate building in order to save money.

Some respondents suggested using new materials including, for example, new brick that is lighter and stronger, or using alternative and cheaper building materials whilst ensuring that these are sustainable/future-proof

Respondents also made suggestions related to different build styles and methods, including consideration being given to using Park/Mobile Homes; factory-built houses which cost less than traditional bricks and mortar homes; building more terraced housing and tenement style properties which have improved insulation, reduce the amount of land required and provide better population density. Another respondent suggested accelerated adoption of Modern Methods of Construction (MMC) as a new way to develop homes; and one respondent referred to trialling client-led strategic regional market intervention in the construction market based on the Arcadis place-making principles to aggregate demand for advanced manufacturing in the region and bringing manufacturing capacity to the region.

## **Investment and incentives to improve affordability**

Many respondents provided suggestions with regards to potential new investments, subsidies and incentives to improve the affordability of housing. Some called for increases to housing subsidies provided by government, while others called for longer-term commitments to new build investments. A few felt that subsidies should be extended beyond current groups (such as first-time buyers) to other groups including retired members of the community.

Some felt that investment in and subsidies for housing using renewable energy sources should be increased (whilst ensuring a value for money aspect that proves their worth). Some respondents thought these could be in the form of grants and subsidies to encourage individuals to implement green energy measures at individual dwelling level, thus reducing reliance on conventional sources of power and reducing the cost of heating individual homes.

One respondent indicated that improvement and energy efficiency grants could be means-tested. Another respondent organisation argued that local government pension funds provide a potential source of additional funding for social housing.

Other proposals included suggestions related to making repairs to existing properties, including through development funding; redressing the balance to

ensure that there is an increased focus on improving existing and re-provisioning as well as developing new housing; and giving a VAT reduction or rebate for housing repairs, maintenance and improvements. Another related proposal involved developing shared equity-based solutions to retrofitting older housing stock, where the government provides cash that owners pay back when selling.

Other proposals included making the mortgage market more accessible to people who do not have long term employment; introducing rent caps; considering use of housing bonds to attract investors; providing incentives and bridging loans to older people to move and free-up larger properties; offering inheritance tax relief on gifts to first-time buyers; and tailoring Land and Buildings Tax regionally.

## **Support for house buyers/home ownership**

Some respondents indicated a need for more support to be provided to first time buyers with subsidies and incentives to promote ownership for those who choose it. Some felt that supporting this group was crucial to the housing market functioning effectively.

One respondent highlighted that investment decisions on land and choice of homes to plot for consent, training and recruitment and supply chains are all hanging on whether the Help to Buy scheme will continue to be available to support future sales, and called for the Scottish Government to clarify its position on the future of the scheme up to the end of March 2023. Others called for the Scottish Government to continue its support and new development of schemes to help people buy homes like the First Time Buyers Fund, the LIFT scheme or shared ownership.

One respondent felt that local authorities also had a role to play in introducing incentives to help people onto the property ladder when transitioning from social housing into private ownership.

However, a few respondents felt that there was also a need to provide subsidies to other groups of people – for example retired members of the community. Some of them argued for more opportunities for Shared Equity housing, Rent to Buy and other models for joint ownership being made available to people at all stages of their lives.

One respondent noted the importance of increasing opportunities for populations who are disadvantaged and removing barriers to home ownership for them – carers were cited as an example. Another respondent emphasised the need to support people with disabilities if they want to move house.

Some considered improved availability of finance to be key to increased home ownership. One respondent called for higher loan to value lending to support those struggling to find the deposit to buy a home.

A few respondents called for changes to the LBTT regime – one respondent, for example, described it as:

- “out of kilter with the Scottish housing market. At present, it places an additional financial liability on buyers when affordability for most prospective buyers is already stretched or out of reach.” - *Architects and design/development organisation and professional/umbrella organisation*

Another respondent raised concerns that regulatory changes put in place following the 2008 financial crisis which acted to ensure that mortgage lending continues to be prudent and sustainable are now starting to restrict the ability of low deposit households to access home ownership in higher value housing markets. Households in these areas are effectively excluded from ownership unless they have material financial support/equity from their family.

## Changes to taxation

Some respondents suggested changes to taxation could be a means of improving the affordability of housing.

Some respondents called on the Scottish Government to consider changes to Land Value Tax to reform the current system of Council Tax. Some respondents also raised concerns about LBTT, including concerns that having higher rates of LBTT than England is having a disproportionate effect on regional housing markets, especially those in Aberdeen and Edinburgh, where the average family home commonly exceeds £325,000 and as such incurs a higher tax rate of 10% as opposed to 5% in England. There is a strong sense from respondents that this is deterring people from moving up the housing market which narrows the availability of housing stock in the middle of the market. Another respondent suggested that:

- “a review of LBTT should decide if the government wants to achieve revenue generation, market fluidity or another objective from LBTT; investigate whether the tax is fit for purpose; consider potential alternative taxation measures, such as a LBTT exemption for downsizers or replacing LBTT altogether with a reformed council tax; and consider a transitional phase from the current system to a new regime”. - *Architects and design/development organisation and professional /umbrella organisation*

Others suggested that subsidies for house builders and developers through the tax system were unjust and resulted in house prices being inflated; and a few respondents thought that there should be increased taxes on empty or second homes.

Some suggestions related to those paying rent, including suggesting changing the VAT position of rental income for housing associations from exempt to VAT-able (and applying a zero rate) which would put the majority of housing associations on a level playing field with local authorities who provide social housing. Another respondent suggested that, in order to encourage renting as a life choice, renters could be offered lower rates of income tax for choosing to live in rented accommodation. Other respondents suggested that the tax system and regulatory regimes could be used to encourage landlords to let properties as long-term homes

instead of short-term lets (the latter is currently more favourable both in terms of tax breaks and lower regulatory and compliance standards) and suggested tax incentives for landlords who meet all of the regulatory standards and provides homes using a Private Residential Tenancy.

Other suggestions related to tax breaks related to investment in low carbon homes, and considering a building's energy performance and sustainability in determining its valuation.

Value added tax (VAT) was also highlighted by some respondents as an important area for review – with calls for this to be set at a single rate for new build and refurbishment.

## **Analysis of Question 4. Do you have any proposals that would increase the accessibility and/or functionality of existing and new housing (for example, for older and disabled people)?**

The responses to this question were detailed and varied. Many respondents set out proposals for increasing the accessibility and/or functionality of existing and new housing.

Key issues raised included:

- The increasing need for accessible housing across all tenures
- The affordability of adaptations
- The importance of alternative housing models such as co-housing models and off-site construction
- The need to increase accessibility for specific groups, such as people with learning disabilities and people with MND
- The need for more support to be given to older people to enable them to downsize their homes
- Opportunities to use technology to increase accessibility

The remainder of this chapter presents a more detailed analysis of the responses to this question.

### **Adaptations to existing housing stock (across all tenures)**

Respondents frequently made reference to the increasing need for accessible housing. Many respondents referred to a shortage of accessible housing, and the need for existing stock to be adapted to meet the needs of older people or people with disabilities.

“There is a significant shortage in accessible housing for people with disabilities, young families and our ageing population. In order to meet the current and future needs of these vulnerable groups, accessible housing should not be considered specialist housing and should be core to mainstream development.” - *Health and social care body or professional/umbrella body*

“One important contribution to the debate is the Equality and Human Rights Commission (EHRC) ‘Housing and disabled people – Scotland’s hidden crisis’ report which states “the demand for accessible housing is increasing, particularly for people who use wheelchairs where projections are that there will be 80 per cent growth by 2024.” - *National third sector organisation*

The need for flexible housing and future-proofing dominated responses. In particular, respondents noted that properties being built currently are too small for adaptation; more level access living is required; improved space standards (e.g. wider doors) are required; and that spending now to futureproof properties will save in the long term.

A few respondents also made reference to flexibility around the use of challenging stock. They noted that while some homes will not be capable of meeting certain standards, these properties should not be disposed of or demolished if people still want to live in these properties.

Some respondents felt that accessibility should be mainstreamed – and not be limited to housing intended for older people or people with a disability, which would enable equity of access and housing meeting people’s needs throughout their lives. Equally, it would enable older and disabled people to visit housing belonging to family and friends. A few people also suggested that in all tenures of housing, when a home has been adapted, it should remain adapted.

“For social housing this means that measures in current legislation around inherited adapted property should be enforced, to ensure those who need it, can get it. For adapted private tenancies, local authorities and the third sector should work with landlords to help them secure tenants. For selling homeowners, they should be encouraged not to remove adaptations and given support to advertise, promote and sell their property to someone in need.” - *National third sector organisation*

Many respondents provided specific examples of the types of adaptations that are required to make housing stock more accessible.

**Table 5.1: Suggestions for adaptations to make housing stock more accessible**

<p><b>General, in all new-builds</b></p>	<ul style="list-style-type: none"> <li>• Widen doors and hallways to enable wheelchair access</li> <li>• Pocket doors to ease opening/ closing</li> <li>• Minimum room width</li> <li>• Sockets and switches at various heights</li> <li>• Automatic lights</li> <li>• A ventilated area for clothes drying</li> </ul>
<p><b>Bathrooms</b></p>	<ul style="list-style-type: none"> <li>• Wet floors</li> <li>• Low-threshold showers as standard</li> <li>• Grab rails installed as standard</li> </ul>
<p><b>Kitchens</b></p>	<ul style="list-style-type: none"> <li>• Adjustable units and sinks</li> <li>• 1.2m long activity space in front of the sink and oven</li> <li>• Ovens should be in a mid-height unit with controls 1200mm above ground level, rather than in an under-counter unit.</li> </ul>
<p><b>Accessibility</b></p>	<ul style="list-style-type: none"> <li>• Covered car ports to enable disabled person to get from the car to their wheelchair to their house in wet weather</li> <li>• Blanket 10% wheelchair accessibility on new builds &amp; existing works</li> <li>• Room for storing and charging mobility scooters, in-house or communal area of block of flats.</li> <li>• Automatic doors, and ramps for access</li> </ul>
<p><b>Sleeping areas</b></p>	<ul style="list-style-type: none"> <li>• Within the accessible sleeping area, require at least one window to have a sill level at a maximum height of 600mm.</li> <li>• Install a robust fitting area to the ceilings to accommodate future provision of a hoist</li> </ul>

A few respondents highlighted the importance of services such as Care and Repair which enable older people to access trusted services designed to help with adaptations to their home. Some also referenced the need to ensure accessibility

outside the home and lack of amenities such as benches or public toilets, which “can keep older people unable to confidently leave their homes.”

One respondent referred to the need to also consider environmental adaptations for those with cognitive impairments e.g. dementia, autism etc. not just physical adaptations. Another respondent referred to existing building codes which make requirements for downstairs bedrooms, wide doorways etc. highlighting that this should mean that as time goes by the proportion of homes with improved accessibility will increase.

## **Affordability of adaptations**

Some respondents referred to affordability in relation to the availability and cost of suitable housing. For example, one respondent noted that:

“Private renting has increased in our area from 9.5% of stock in 2007 to 19% in 2017, and there is concern that affordability is an issue as this sector can often be more expensive than social tenancies. Creating a housing system where people spend less of their income on housing costs will help to alleviate poverty and allow more finance to find its way into the real economy. Ensuring that investment in new affordable housing is a priority will increase affordability and assist in providing choice over where tenants want to live. This will meet the vision of ‘A Well-Functioning Housing System’ as people will not have their options limited when choosing where to live.” - *Local authority*

Another respondent suggested that Government should require RSLs to set a flat rate for rent across a local authority giving the example that the rent for a one-bed council home would be the same in Kirkcaldy as St Andrews.

Some respondents highlighted issues of affordability in relation to the costs of improving accessibility of existing housing across all tenures. In particular, respondents highlighted issues related to the affordability of ongoing service charges to maintain lifts in flatted dwellings, and the challenges of keeping people in their homes, for example in older tenements, where it is not possible to install a lift. Some raised concerns about other barriers face by disabled households which could affect affordability – for example, highlighting the need to consider the relationship between other equality issues in areas such as employment and the impact this has on housing options.

Some respondents noted the importance of ensuring that adequate guidance is in place to ensure that adaptations are undertaken to a high standard, meet needs and are affordable. A few also commented on the need for the process for adaptations to be more efficient, emphasising that local authorities need to address bureaucratic hurdles and delays that exist within adaptations systems, to ensure that low-cost, minor adaptations in particular can be installed quickly and easily. Care and repair services were highlighted by some respondents as an effective way of addressing deficits with one respondent suggesting that these become a mandatory service offered by local authorities.

Another suggested that there would be value in recruiting housing officers to support specific complex needs and the needs of older people to ensure more personalised housing planning approaches. Some also highlighted the value of involving Occupational Therapists to identify need and oversee the provision of adaptations.

“Steps should be taken to increase the efficiency of the adaptations process, by implementing the guidance within the Royal College of Occupational Therapists (RCOT) report 'Adaptations without delay'. There are current examples of good practice in this area, for example in East Lothian, where Occupational Therapists are training and working alongside community care workers to specify and oversee the provision of adaptations for residents of all tenures in a timely and equitable manner.” - *Health and social care body or professional/umbrella body*

“Where existing housing stock is being refurbished, Occupational Therapists can provide expertise and generate cost savings by ensuring that works maintain or enhance the existing level of accessibility, thereby ensuring that the availability of accessible homes does not decrease and, in some cases, increases. This will reduce the need for additional adaptations in the future and can remove risk factors that may result in injury and cost to the health system. Many housing associations and councils are already building in this approach to their asset management and cyclical maintenance programmes – good practice should be highlighted and shared and built into the Regulation Framework going forward.” - *Health and social care body or professional/umbrella body*

Scottish Government was also referenced as having a key role to play in ensuring provision and equity of funding for adaptations, and ensuring the right regulatory framework is in place. For example, one respondent suggested that Scottish Government should provide additional funding to disabled people’s organisations and advice agencies, to increase the supply of independent advice and information regarding housing options, including adaptations, with a particular focus on the private rented sector. Another respondent referenced the need to address the disparity between tenures by reviewing and amending the elements of the Housing (Scotland) Act 2006 that relate to the Scheme of Assistance legislation together with a review of the related funding and guidance, in order to ensure consistency of outcomes, good practice and equal rights for disabled people, regardless of tenure type.

### **Increased accessibility of new housing**

Many respondents referred to improvements that were required to ensure the accessibility of new housing for older and disabled people. This included consideration of new forms of design and construction methodology being encouraged to put accessibility and flexibility at the forefront of planning.

Some argued that all new designs should be fully accessible, while others felt that investment should be focused on a minimum number of units in any site.

“Rather than spreading investment across all units it may be more effective to focus investment on a % of total units. For instance making all sites fit site level and Disability Discrimination Act (DDA) accessibility adds materially to site cut and fill costs but will only be of relevance to a minority of purchasers. Agreeing a subset of more adaptable units within a wider development may create more effective and focused investment” - *Individual*

“The Scottish Government to require all local authorities to ensure that a minimum of 10 per cent of new-build homes across all tenure types are built to a wheelchair-accessible standard. This should be monitored and reviewed.” - *National third sector organisation*

“There should be a requirement for new developments to provide suitable housing for older people / sheltered accommodation in same way they are required to provide affordable housing. But need to be cautious as if too many requirements, house builders will go elsewhere.” - *Agencies, advisory groups and other national bodies*

Flexibility in design at the outset was considered by many to be key, with the potential to enable people to remain in their own home for longer, reduce the risk of injury, reduce demand on health and social care and reduce costs associated with major adaptations. This included suggestions to ensure that future housing can be split into smaller units to enable downsizing; requiring new and re-developed homes to follow lifetime homes principles of inclusivity, adaptability, accessibility, sustainability and good value to ensure that there is flexibility within the housing stock to adapt to changing needs and allow people to remain in their communities. For example, one respondent referenced a model in New Zealand /Australia, where new builds have moveable walls so that houses can be easily modified to suit changes in family requirements.

As previously noted, the majority of respondents stated that designs for new housing should accommodate a range of features including electric wheelchair usage within the property and charging points for these, mobility scooter storage/parking; provision for future lift space; and a downstairs footprint that is large enough that it can be converted to a downstairs bedroom along with a space for a wet floor shower.

Views were mixed in relation to the size of properties which should be built with some respondents arguing that all new housing for older or disabled people should have a minimum of two bedrooms to accommodate friends and family visiting, and carers/future carers. This would also allow for changes in health/disability where couples may later require separate bedrooms.

Others argued that the range of size of new houses being built should depend on demand in an area.

“For the majority of people, the smallest size house should be a 2-bedroomed. Maybe young single people would like a 1-bedroomed house, but for a young couple, then when they start a family, they would not have to move house; for an elderly couple/disabled person, they could have carers staying if required.” – *Individual*

“Require new developments to have a wider mix of housing size that would allow people who want to downsize to move to a smaller home that will support future mobility constraints.” - *Consultation event attendee*

“We need to provide properties that people want to live in. Currently within the (Aberdeen) city housing stock we have an over-supply of 2 bedroom properties and not enough 1 and 3+ bed properties. However, 2 bed properties continue to be built. The increase in single households as well as large (often blended) families is not being catered for in the current housing stock. Amongst council housing tenants there is a desire for houses, with their own front door and garden. There are fewer people wanting to live in flats, yet we continue building flats.” - *Consultation event attendee*

“To create communities we need to see a mix of building types within developments, allowing first time buyers, families and older people to have a home that is suitable for them – facilitates independence and remaining in community. We should not allow developments with only one or two property types e.g. just 4 or 5 bed villas.” - *Consultation event attendee*

## Alternative models

Some respondents provided a range of suggestions for alternative approaches to the provision of accessible, flexible housing for older and disabled people. There was little homogeneity amongst these – however a few recurring ideas were presented including proposals for co-housing models; off-site construction; and the introduction of more common spaces to promote a sense of community.

A few examples of suggested models are noted below:

“The Cohousing model is a particular form of neighbour commitment, involving a sharing culture - extending to a common house, gardens, and even cars. The common house is usually configured such that it allows shared cooking and dining, meeting and performance space, guest bedrooms and laundry facilities. Like its bedfellows, Cooperative housing and collective self-build, there is usually a determination among Cohousing groups to build as environmentally-responsibly as possible and on a not-for-profit basis - such that cost is price and price is cost.” - *Local third/community sector organisation*

“With an ageing population and an increasing need for smaller unit dwellings to accommodate more single person households, there is an increased opportunity for the use of offsite construction to become more commonplace in Scotland over the next twenty years.” - *Architects and design/development organisation and professional/umbrella organisation*

“Remodel backcourts so that they have an accessible street level access door through which then allows people to store bicycles in communal bicycle sheds out the back, older people can store electric bikes and trikes; Retrofit lifts into tenement blocks - where it makes more sense join blocks together; take washing machines out of tenements and instead have communal facilities in the basement - as Sweden does - this makes life more communal and therefore means neighbours are more likely to notice if someone needs help.” - *Individual*

## Self-build opportunities

A number of responses focused on the need to improve opportunities for self-build. It was seen by some respondents as a more affordable route, one that was flexible and enabled design to meet individual needs, provided choice and variation, and offered opportunities to include energy efficiency build methods. Barriers identified included lack of weighting in planning processes currently, objections from the house building industry, issues with health and safety, and challenges getting finance from lenders. An example of how this is being approached in Glasgow is given below.

“In order to achieve our housing supply targets and meet future housing needs and demand, Glasgow’s Housing Strategy is committed to exploring options for innovation in construction methods and new housing delivery. An example of this approach is Glasgow’s new self-build programme.

The Council has established a Register of Self-builders and committed to a pilot project within the Maryhill Transformational Regeneration Area (TRA). It seeks to address the three main issues and constraints to self-build which include land availability, planning permissions and access to finance. At Maryhill, vacant and derelict land has been remediated and services installed to plots to enable release for self-build.

The council has developed an innovative ‘Planning Passport’, which provides a ground-breaking design code and a plot passport route for Self-Builders, streamlining the planning process. Glasgow Self-Build Programme is also engaging with lenders and mortgage brokers to identify potential for developing new, bespoke products that would increase opportunity and access for households interested in self-build.” - *Local authority*

## Standards/regulations

Some respondents to the consultation highlighted a need for further prescription through standards and regulations. Many of the comments focused on the need to set meaningful targets that could be enforced, supported by strong building standards. Some went as far as to call for mainstreaming of standards of accessibility and functionality making housing adaptable and flexible to meet occupants' needs over the life course.

Some respondents suggested that Scottish Government should bring housing building standards in line with commercial building standards; some though that developers should be compelled to consider the needs of an ageing population with multiple health needs; and some respondents thought that regulations should be tenure-neutral, with a single governance framework for adaptations, irrespective of tenure.

Enforcement was a recurring issue highlighted by respondents.

“The private sector isn't producing the homes that older people need. This could be controlled through planning and a more assertive public sector. Question over who is/will be enforcing requirements – local authorities don't have the resource to do so.” - *Consultation event attendee*

Some also suggested a ratings system be developed for private housing which indicates how accessible the house is with suggestions including incorporating some form of ratings system into home reports; and the creation of a database to help people find a suitable technology-accessible home.

Some respondents made specific suggestions with regards to enhancing or adapting current regulations and guidance. These suggestions included:

- Mainstreaming space standards for housing that are inclusive of everyone's needs.
- Updating the Housing for Varying Needs standards which have not been updated for some time.
- Introducing national up-to-date standards applying to all tenures for all new build housing to mainstream standards of accessibility and functionality making housing adaptable and flexible to meet occupants' needs over the life course.
- Consider introducing further enhancements/amendments to the Domestic Building Standards Handbook to ensure future (and altered & extended) housing is more readily adaptable should the need arise.

## Increasing accessibility for specific groups

A few respondents made suggestions related to addressing the needs of specific groups – these included suggestions related to people with motor neurone disease

(MND), people living with dementia, and gypsy travellers. The issues they raised are summarised below.

### **People with MND**

The respondents who commented on people with MND noted that they not only need greater space for their wheelchairs (which are larger than an average wheelchair) but potentially hospital beds, hoists and a range of other equipment, all of which is essential to them living at home for as long as possible. They called for a new cross-tenure space quality standard to ensure that the needs of people affected by MND are met in the future.

They also highlighted barriers to people with MND trying to access adaptations or alternative accessible housing which included protracted decision-making processes and bureaucratic hurdles. They noted that people with MND have an average life expectancy of just 18 months from diagnosis and so waiting times of 12 months, and requiring three separate quotes for adaptations, for example, are not acceptable. They also supported calls for improved identification and marketing of accessible homes such as ratings systems, as previously suggested. They called on the government to introduce a fast-tracking system for some groups of people for accessible housing to avoid postcode lotteries.

### **Gypsy / travellers**

A few respondents highlighted challenges facing older or disabled members of gypsy/traveller communities, noting that there are particular issues around adaptations for static caravans/chalets which are classed as unsuitable or ineligible for adaptation. Some gypsies/travellers are therefore forced into mainstream housing as a result of ill-health or disability, and this is known to have a detrimental impact on their wellbeing. Most gypsies/travellers do not move into brick-and-mortar housing by choice. The majority would prefer to remain on site. It was also noted that gypsies/travellers have expressed their sadness at being forced to live in houses and the consequent loss of culture, as well as practical support from extended family.

Another respondent referred to Scottish Government's standards for gypsies/travellers which they described as challenging to meet in their local authority. In addition they noted that the gypsy/traveller community cannot access Strategic Housing Investment Plan (SHIP) funding as a property is required, and members often prefer to stay in a caravan. They suggested a relaxation of the rules to address this.

### **People with learning disabilities**

A few respondents highlighted particular issues facing people with learning disabilities and the need for them to be able to exercise maximum choice over where and with whom they live. A lack of support from housing providers was cited as a particular challenge - this ranged from a reluctance to provide information in accessible formats, such as 'easy read', to a lack of specificity in advertisements for accessible properties and a lack of assistance with applications. It was also

reported that tenancy agreements and correspondence from landlords, contains language that is legalistic and therefore inaccessible to many people.

Another respondent noted concern about the lack of choice and restriction on independent living resulting from a lack of accessible housing of a variety of tenures available to people with learning disabilities. They also highlighted a trend back towards shared tenancies for people with learning disabilities in some local authorities which they believe is motivated by cost.

### **People living with dementia**

Some respondents highlighted the challenges being presented by our ageing population and in particular the expected rise in dementia.

Respondents recognised the Scottish Government's understanding of the importance for people living with dementia of housing design and flexibility and timely and person-centred support for them and their carers. A few, for example, cited 'Age, Home and Community: the Next Phase' in which the Government listed some of the actions taken, such as supporting the development of a dementia and housing design guide.

Respondents' suggestions for improvements included Scottish Government issuing guidance around provision of dementia-friendly housing; increased funding and support for Health and Social Care Partnerships to support improved post-diagnostic support; frontline staff being trained to support people living with dementia; and focusing on early intervention support being prioritised for people living with dementia, including home adaptations.

### **Supporting independent living**

Many respondents emphasised the importance of adaptations in enabling people to remain in their own home for longer and maintain their independence. They emphasised the need for provision to ensure this, whilst maintaining safe levels of care and support. Adaptations were also highlighted as a preventative measure for reducing crisis and acute interventions, thereby reducing demand upon health and social care services.

One respondent highlighted that the availability of accommodation where there is a warden service is becoming rarer and called for the Government to consider ways to encourage the increase in wardens supporting people in assisted and sheltered accommodation.

### **Support with downsizing**

Some respondents raised the issue of downsizing and noted the need for more support to be given to older people to enable them to downsize. Suggestions for this type of support included:

- Tailored advice to older people on how to market their home and assistance with practical matters like packing and moving, as well as property searching.

- All housing partners and the Scottish Government need to work together to shift emphasis from downsizing to 'rightsizing' for older people. It should be viewed as a positive choice for older people to choose to move home to meet their needs and improve their quality of life. This has the added benefit of freeing up larger family homes for those who need them.
- Provide moving assistance for older people seeking to downsize – to help with information, advice and practicalities, as well as helping them to find suitable properties (which is hard when they are often competing with first time buyers for smaller homes).

## **Use of technology to increase accessibility**

Many respondents referred to the need to apply new technology to homes to improve their accessibility for older and disabled people. Technology was seen as key to enabling people to stay in their own homes for longer, and planning ahead for these needs was considered to be important.

Some respondents referred to the need to ensure that homes are digitally enabled to keep people connected and mitigate against digital exclusion amongst the growing older population. This was seen as an opportunity for housing to embrace emerging assistive technologies enabling people to live independently in their own home and increase accessibility. They were keen to see innovation and best practice in new technology prioritised, for example through evaluation and roll out of innovation such as the Fit-homes project being delivered through City Deal funding in Highland.

A few respondents highlighted that house building design and construction needs (across all tenures) to take more account of the new technologies and materials currently available to enhance the digital capability of all houses for residents' benefit. Some respondents also referred to the need to further develop the national strategy for the use of Technology Enabled Care (TEC) with some seeing this as an essential support to core NHS services, and others stating that this should be incorporated into the replacement for Housing for Varying Needs.

Ensuring that there were sufficient numbers of staff appropriately trained to apply and support more extensive use of technology in housing was another recurring theme.

Some respondents provided specific examples of actions they would like to see taken, for example the installation of automated shading devices to avoid overheating of the elderly and infants; ensuring all homes have affordable internet connectivity as standard to ensure communities are well-connected to each other; and offering subsidies to companies to assist in developing innovative and cost-efficient approaches.

One respondent gave a detailed example of interesting use of technology in one project in the North East of England:

“Gateshead Innovation Village is a live research project led by Home Group and supported by Homes England and development partner ENGIE. The project has delivered a range of traditional and modular homes with energy efficient smart technologies to test the benefits and durability of different construction methods and technologies, aiming to improve public perception of modular homes. Home Group is working with specialist partners to robustly compare and contrast traditional construction against different modular methods by building a new village of 41 homes with 35 modular houses (16 volumetric and 19 modular houses), alongside 6 traditional houses, using five different modern methods of construction (MMC). As well as testing construction methods, we have partnered with leading smart tech companies in the UK and Northumbria University to see how smart technology can be used in our affordable homes.

We want to explore how we can deliver our mission to build independence and aspirations for households using technology traditionally considered out of the reach of many people in society in order to help us improve support for people with mental health or social care needs.

We have at our disposal, monitors that detect falls – and even predict when falls may occur; activity-monitoring systems allowing people to check on relatives living elsewhere; technology that monitors the temperature in a frail persons’ home and sends alerts via text if temperatures rise or fall outside of pre-set limits.

Initial findings have revealed the dramatic impact it could have on the lives of people with learning disabilities and autism. The research looked at how assistive technology can not only improve independence and quality of life for people requiring care, but also enable family and health professionals to spend more quality time with those they care for.

For example, utilising smart sockets to collect motion, temperature and power usage data. This can be viewed by family and carers to indicate the person is warm, drinking, eating and active. It also sends alerts when unusual behaviour, such as inactivity, is detected.

Smart watches were also used to track steps, calories and sleep. This is important for people with learning disabilities as it indicates whether a person was awake during the night or had a light or restful sleep. Health care professionals can then access the data prior to a home visit. The live research is being undertaken by a senior research assistant, who is living and working in one of the houses in order to gain a deeper understanding of the advantages and practicalities of assistive technology.

In terms of risk management, the benefits of assistive tech are considerable. As well as helping keep people safe, in a social care setting they also free up staff to deliver more value-added care, rather than spending large chunks of time doing checks.

Research findings will start to emerge in the coming months, with the bulk expected in the middle of 2020. Representatives from Home Group and Northumbria University will present the first phase of research to senior NHS (England and Wales) leaders at the Mental Health Network conference next week (March 5th), with a full research report due to be published later in the year.

Those findings should help us answer a plethora of questions relating to a range of topics and issues that we are sure the Scottish Government will find useful.” -  
*Registered social landlord*

## **Analysis of Question 5. Do you have any proposals that would help us respond to the global climate emergency by increasing the energy efficiency and warmth and lowering the carbon emissions of existing and new housing?**

Respondents provided a wide range of very detailed responses to this question and made a series of suggestions for increasing the energy efficiency and warmth, and lowering the carbon emission of existing and new housing.

Key issues raised included:

- The need for greater regulation and higher standards to be applied to new build housing across all tenures.
- The importance of ensuring that adaptations are made to existing housing stock.
- The importance of trialling new construction methods to enhance energy efficiency and reduce carbon emissions.
- The need to ensure a transition from oil and gas to other energy forms.
- The tensions between energy efficiency and heritage.
- The need for a mix of regulation and monitoring alongside education, advice and financial support across all tenures.

A more detailed analysis of the responses to this question is provided below.

### **New housing**

Many respondents made suggestions relating to increasing the energy efficiency and lowering the carbon emissions of new housing. Many observed that, in relation to social housing, good progress was being made (with room for further steps to be taken), but that more needed to be done to apply the same standards more consistently in relation to privately built housing.

Generally, respondents called for tighter regulations which required higher standards to be met. This included, for example, respondents calling for regulation to be introduced as a matter of urgency to ensure that new build dwellings do not continue to rely on natural gas as the main fuel source for heating.

Many respondents encouraged the introduction of more innovative construction methods including modular build, factory and off-site build; testing of new/alternative recycled building materials; and local sourcing of materials and labour to minimise impact to the environment (and improve affordability).

Passivhaus standards were frequently cited as an example of innovative construction methods which have demonstrated energy efficiency with positive impacts on health and wellbeing.

Some of the most frequently arising proposals made by respondents in relation to new housing are described in the table below.

**Table 6.1: Frequent proposals for increasing energy efficiency and lowering carbon emissions in new housing**

<p><b>Design &amp; Development</b></p>	<ul style="list-style-type: none"> <li>• Whole roof PV (and/or PVT (for example Consolar Solink)) (Use in 5GDHC)</li> <li>• Ensuring internal drying spaces</li> <li>• Including cycle storage in homes and other buildings</li> <li>• Work with structural engineers to step up to this challenge</li> </ul>
<p><b>Energy Efficiency</b></p>	<ul style="list-style-type: none"> <li>• Installing triple glazing as standard</li> <li>• Installing Solar panels on all new builds as standard that provide power to the home or can be linked up to contribute to the National Grid</li> <li>• Installing heat pumps</li> <li>• 4GDH ULTDH heat networks with inter-seasonal storage (e.g. BTES)</li> </ul>
<p><b>Carbon Reduction</b></p>	<ul style="list-style-type: none"> <li>• The use of sustainable and recycled materials as a means of reducing our carbon footprint</li> <li>• Requiring developers and builders to incorporate planting trees in new housing developments</li> <li>• The use of sunspaces and buffer zones to be included as eligible measures in developing low carbon homes and should be supported through planning and building standards</li> <li>• Target 50% reduction in embodied carbon in building design</li> </ul>

Three innovative approaches to increasing energy efficiency and lowering carbon emissions in new housing are summarised in the table below.

**Table 6.2: Innovative approaches to increase energy efficiency in new housing**

<p><b>Example 1: Private landowner</b></p>	<p>The Scottish Government could adopt a system similar to the Dutch 'Madaster Platform', a material passport within the construction process. A material passport approach could be accommodated within the existing 'Building Information Modelling' (BIM) process.</p>
<p><b>Example 2: Academics</b></p>	<p>Adopt a "Horizon Net Zero" approach. This can include:</p> <ul style="list-style-type: none"> <li>• designing for manufacture &amp; assembly (offsite)</li> <li>• designing for future disassembly</li> <li>• designing for material recovery and reuse by future generations (given future world shortages of material resources)</li> <li>• designing towards sequestration of carbon within buildings (greater use of timber, preferably home-grown where possible)</li> <li>• designing using recycled or reused materials (such as sand and demolition waste within concrete block and concrete products)</li> </ul>
<p><b>Example 3: Registered social landlord</b></p>	<p>In all our developments Home Group pursues environmentally friendly procurement through the evaluation of the environmental impact of the contracts awarded. This focuses on the use of whole life costs in procurement decisions, adopting the principle of 'reduce, reuse and recycle' or selecting low energy alternatives.</p> <p>As with other projects, at the Springburn Way development in Glasgow where we have created 40 high quality 2-bedroom homes for social rent, we have taken a fabric first approach and incorporated a range of sustainability initiatives which include:</p> <ul style="list-style-type: none"> <li>• Meeting the building regulations full silver standard 1-8</li> <li>• High efficiency boilers with heat recovery</li> <li>• Solar panels</li> <li>• Ducting for future electric car charging points</li> </ul>

One respondent suggested that the opportunity for housing sites to absorb carbon should also be prioritised.

“Carbon costing and careful development avoiding development on carbon rich soils is one of the initiatives that could be taken forward. Soils are good source of storing carbon and future housing development would have a huge impact on carbon loss. A policy at the local level would help to reduce losses from soil carbon.” - *Local authority*

A few respondents encouraged the Government to develop a national policy approach to green roofs and green walls that was “appropriate in a Scottish context and suggested there may also be a role for settings targets for green roofs in particular towns and cities where the need to manage surface water in a changing climate is a constraint on further development.” A few respondents went as far as to suggest that building regulations should mandate the use of green roofs on all residential buildings with significant areas of flat roof.

Assessment and review were also considered by many to be important. For example, some respondents suggested inspections following completion of new housing which specifically assessed energy efficiency. One respondent, for example, felt that the government should require 100% of new and refurbished homes to be subject to post-occupancy evaluation (POE) and building performance evaluation (BPE) which would be carried out within 12 months of completion of the work.

### **Infrastructure for electric vehicles**

Some respondents emphasised the importance of ensuring that there is provision for electric vehicle charging points. In new build housing, this would mean ensuring that appropriate cabling was laid at the point of construction. Alongside this, some respondents called for grants for electric vehicle charging points to be made available to people already owning or intending to invest in an electric vehicle.

Other related ideas included electric car clubs and electric cargo bikes.

### **Renewable energy and alternative heating options**

Many respondents made reference to the need to ensure that renewable energy and alternative heating options - including low carbon heating options and air source/ground source heat pumps - were embraced. They emphasised that models like the Home Energy Efficiency programmes need to be rolled out across the country across all tenures and quicker progress should be made on introducing low/zero carbon district heating schemes.

“The use of green infrastructure to reduce energy demand insulating and cooling and to reduce exposure - planting around housing can help to address climate change while delivering wider co-benefits such as health and wellbeing and for biodiversity etc.” - *Local authority*

**Table 6.3: Renewable energy and alternative heating proposals**

<p><b>Renewable Energy</b></p>	<ul style="list-style-type: none"> <li>• Solar panels on all new builds as standard that provide power to the home or can be linked up to contribute the National Grid</li> <li>• Deployment of solar arrays on brownfield sites to promote biodiversity growth</li> <li>• If water can be used for hydrogen production, Scotland has a plentiful supply. Should keep Scottish Water as a publicly owned company but partner with Scottish Gas Network (SGN)/Centrica etc. for supply</li> </ul>
<p><b>Alternative Heating Options</b></p>	<ul style="list-style-type: none"> <li>• Heat pumps central/local (both may be best: central district heating heat pump, plus micro booster HP in properties)</li> <li>• 4GDH ULTDH heat networks with inter-seasonal storage (e.g. BTES)</li> <li>• Heat from sewers to be used to heat tenements – small block by block systems (SHARK project at the Borders College in Galashiels uses sewers to heat buildings)</li> <li>• Community-based local heat and energy schemes</li> <li>• Easy to introduce hydrogen heating, especially in cities where there are apartment blocks – most properties will have access to the gas network and would not require massive disruption to convert/introduce</li> <li>• Community heating systems may be viable and have greater buy-in in rural areas. However prohibitively expensive to retrofit – should be considered for industrial/commercial builds</li> </ul>

Some respondents highlighted the challenges posed currently – including sustainable and renewable energy options for heating homes unable to compete with the low cost of gas, making them an unviable option for many people.

In addition, some respondents noted a need for there to be more equality around standards for energy (Energy Efficiency Standard for Social Housing<sup>17</sup> (ESSH), etc.) across all tenures and grants for those who cannot afford to participate.

<sup>17</sup> <https://www.gov.scot/policies/home-energy-and-fuel-poverty/energy-efficiency-in-social-housing/>

## More extensive use of timber in new-build housing

Some respondents emphasised the importance of using more wood in new build housing to reduce the impact on the environment (and respond to the global climate emergency).

They suggested that there should be more focus on reducing the whole-life carbon impact of new homes and that policies would be needed to support the increased use of timber frame construction systems. Furthermore, they felt that the construction and manufacturing sectors should explore options for offsite construction, which could significantly reduce construction site emissions.

Some respondents also felt it was important to highlight that the timber should come from certified sustainable sources.

## Existing housing

Many respondents identified the need to ensure that existing stock was also improved in relation to energy efficiency and warmth, with some emphasising the importance of accelerating the process of retro-fitting.

Many also emphasised the need for higher standards, as applied to social housing, to be applied across the wider domestic sector and for this to be appropriately regulated. Some acknowledged that this may require financial incentives, coupled with awareness raising and education to encourage compliance.

**Table 6.4: Suggestions for improvements and changes to existing housing**

<b>Encouragement/ Support for Private Landlords/Owners</b>	<ul style="list-style-type: none"><li>• The need to incentivise owner occupiers to make improvements to energy efficiency standards by setting minimum EPC ratings and require those to be met before able to sell.</li><li>• Put more pressure on private landlords and homeowners to comply with targets and standards to make homes energy efficient and fit for purpose, perhaps through a prohibition on re-sale of houses that have not met the energy rating standard. Financial support mechanism may be required beyond simply expecting them to take out a loan to do so.</li></ul>
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	<ul style="list-style-type: none"> <li>• Encourage more private rental co-operatives – these stand out for their ability to build up significant surpluses that can be reinvested in eco-efficiency measures. These co-operatives meet their costs (mortgage, maintenance, administrative) from the rent paid by their member-tenants. Over time these co-operatives build up operating surpluses which cannot be distributed to members and must instead be reinvested in the co-operative, held in reserve.</li> </ul>
<p><b>Changes to Standards Assessment</b></p>	<ul style="list-style-type: none"> <li>• Relax restrictions on listed buildings to enable energy efficiency improvements to be made (e.g. double glazing)</li> <li>• EPC's and SAP assessment methodology needs to change – currently more geared towards fuel poverty than sustainability</li> </ul>

A few respondents noted the value of partnership working to address improvements to energy efficiency. One example of how this could work in practice is provided below.

“Carbon reduction and environmental sustainability is a major concern for us all. [We], in common with other landlords in the social rented sector, has invested heavily in addressing these challenges and have made great progress. As a result, we recognise that some of the most significant challenges remain in the owner occupied and the private rented sectors. However, there is a positive potential role for the collective strength of the social rented sector to provide the critical mass in local markets to sustain a contractor base to install and maintain a range of stock improvement measures. We intend to work with our new economic development agency in the South of Scotland to explore these matters further and enable the pace of delivery to be increased to meet the challenging carbon reduction targets that we face. This is another example of the future potential of the affordable housing sector to have an impact beyond simply serving the needs of our own tenants/customers, with the appropriate level of support.” - *Registered social landlord*

## Improved transport provision

Improved transport options and links were frequently cited as key to improving energy efficiency. For example, some respondents emphasised the importance of having fewer cars on the road by ensuring housing is built close to employment hubs. Others referred to the need to promote sustainable travel and active travel through housing policy that reinforces a more holistic and integrated approach which recognises that cycle routes and walking paths are essential to creating a more sustainable transport network.

## Revisions to the EPC Framework

A few respondents called for a review of the EPC framework and some questioned the efficacy of the current process of assessments.

“I think the current moves to display the EPC on adverts and require landlords to meet certain EPC ratings are a good start, but I think more needs to be done. I think the EPC rating itself needs to be improved and modernised.” - *Individual*

Another respondent described the EPC process as:

“no longer fit for purpose. By treating every property as individual and not replicating or cloning EPCs a better picture of current stock can be gathered and every home can be recommended appropriate measures (not just what current funding allows for). Funding can then be used wisely and for varying recommended measures which will also help stabilise the boom or bust energy efficiency and renewable trades.” - *Local third/community sector organisation*

Another respondent raised concerns that the auditing of these surveys has reduced over time and that there is experience of like for like properties being assessed at different EPC bands.

## Funding to improve the energy efficiency of homes

Respondents made a range of comments with regards to potential funding routes for improving the energy efficiency of homes. These are summarised in the table below.

**Table 6.5: Suggestions for funding routes to improve the energy efficiency of homes**

<b>Mortgages and Loans</b>	<ul style="list-style-type: none"><li>• The Scottish National Investment Bank to have a role in leading strategic investment not just in housing, but the required associated infrastructure and green finance</li><li>• Home equity release schemes operated locally</li><li>• 0% interest loans for energy efficiency upgrades repaid on sale of house with a charge on the property for repayment</li><li>• Green mortgages offering cheaper rates for properties that achieve an EPC A or B rating (some lenders already offering this)</li></ul>
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## Grants

- Grants for works to upgrade older properties across tenures for energy efficiency measures such as upgrading heating equipment, insulation installation and replacement window programmes

## Education

A few respondents noted the importance of increasing education and awareness raising in relation to energy efficiency and climate change with regards to housing. It was noted that this should include wider availability of clear, easily accessible information about the options open to people in different kinds of homes to reduce their emissions and tackle the climate emergency.

One described behaviour as being a significant part of the problem with regards to fuel poverty, energy efficiency and climate change, and that from an early age people needed to be encouraged to fundamentally change how they think about their environment.

One respondent felt that education on carbon off-setting, funded by the government, should be introduced to help people understand how best to achieve this. Others felt it should have a greater emphasis within the school curriculum. Another person observed that there needed to be more information sharing with regards to options already available for upgrades.

Another respondent suggested that those engaged in the construction sector also required enhanced training around the “urgency of climate emergency and design and construction strategies to stop contribution to climate emergency.”

## Analysis of Question 6. Do you have any proposals that would improve the quality, standards and state of repair of existing and new housing?

Respondents made various suggestions, with the most common themes discussed in response to this question being:

- Repairs and maintenance to existing housing stock
- Adaptations
- Skills development in the construction industry and trades
- Regulation of tradespeople
- Innovative construction models
- Measures to improve the quality of new build housing
- Issues around empty homes.

We discuss each of these themes below.

### Existing housing stock: repairs and maintenance

Many respondents referred to the importance of repairs and maintenance in improving the standard of Scotland's existing housing stock, and some observed that this should be a higher priority than building more new housing.

“Local authorities must invest in older housing stock and not only prioritise new build housing.” - *Local third/community sector organisation*

“We need to think beyond just building new homes as the primary solution to national housing problems.” - *Architects and design/development organisation and professional/umbrella organisation*

Comments related to several aspects associated with repairs and maintenance, including ensuring consistent standards across tenures and between new build and existing stock, as well as suggestions for promoting improved levels of maintenance in Scotland's existing housing stock. We discuss these issues below.

### Consistent standards related to repairs and maintenance across tenures

Many respondents commented on the differences in standards related to repairs and maintenance between social housing and properties that are owned by private landlords or owner occupiers. There was a commonly held view that, while the Scottish Housing Quality Standards ensure high standards in the social housing sector, there were no equivalent standards in the private rented and owner occupier sectors, where standards of repair and maintenance tended to be lower: “Levels of

disrepair in the private sector housing stock are stark". The consensus among many respondents was that this was particularly true in the private rented sector, with a view expressed by a minority that "private landlords often focus on maximising revenue income potential rather than longer term asset management which requires capital investment and ongoing maintenance".

Consequently, there was widespread support for the development of a single set of standards that would apply to all housing, regardless of tenure, to ensure that property owners maintain their housing in a good state of repair. The comments below are illustrative of the responses from many respondents.

"There should be a single set of quality standards across all tenures to ensure standards are of high quality, flexible and adaptable." - *Local authority*

"Charters [should be] in place for both the social and private rented sectors which set out minimum standards and which continue to be refreshed annually." - *National third sector organisation*

Some also indicated that these standards should have a legislative foundation so that property owners would have a legal obligation to maintain the housing effectively.

Some respondents noted that the standards should encompass general repair and maintenance as well as energy efficiency standards. A few referred specifically to the Energy Efficiency Standard for Social Housing (EESH2) and commented that this should be applicable to private landlords too. One respondent urged the Scottish Government to ensure that the private rented sector is "held to the same high standards as social housing" as "otherwise they will hinder social landlords meeting EESH2 in mixed tenure common blocks". A few respondents referred to other recent legislative changes that had led to improvements in fire safety in social housing and noted that these should be extended to the private sector too.

"Private landlords should be held to the same health and safety and energy efficiency standards as social landlords." - *Local authority*

While most comments related to improvements required among owner occupiers and private landlords, some respondents also noted that investment was needed in social housing stock.

### **Consistency in standards for existing housing and new builds**

A common view among many respondents was that existing homes should be updated, with repairs and improvements carried out to ensure they meet the same standards as new build properties, particularly in terms of energy efficiency. A few respondents specified that this could involve the installation of new doors, windows, insulation materials and heating systems.

“Support needs to be provided for thermal performance upgrades such as insulation and windows. There needs to be choice and availability of systems for replacing current gas, oil and other carbon-based heating systems.” - *Architects and design/development organisation and professional/umbrella organisation*

A few respondents discussed the specific challenges associated with updating Scotland's older housing stock from the 20<sup>th</sup> century or earlier.

“A step change is needed to address the challenges with pre-1919 tenements and this requires a more holistic approach to assessing building performance and developing a package of works which includes carrying out essential repairs as well as retrofitting all required elements to decarbonise heat and energy supply and improve thermal efficiency.” - *Local authority*

### **Financial support for private landlords and owner occupiers to undertake repairs and maintenance**

Some respondents noted that owner occupiers and landlords must be encouraged to maintain their properties adequately and some felt that potential resistance from owners and landlords to invest in their properties to bring them up to the required standards is a significant threat to working towards the Housing to 2040 vision.

Suggestions for support that could encourage private landlords and owner occupiers focused on financial assistance including loans and grants, and VAT reform. We discuss these issues below.

#### **Loans and grants**

A common suggestion from many respondents was that the provision of low interest loans and grants could help private landlords and owner occupiers to make repairs. Often, respondents provided little further detail beyond advocating the need for financial support, but a few gave more detailed suggestions such as enabling access to low or zero interest loans, home equity loans and/or grants. Two suggested that the newly formed Scottish National Investment Bank could provide loans for home improvements.

A few others cited the Scheme of Assistance, which is “critical in maintaining and promoting housing quality in the private sector and should be a key element of any future vision for housing quality, particularly given the scale of private sector stock”. One suggested a review of the scheme to evaluate how well it is working locally, and a few others suggested providing more resources for local authorities to deliver the scheme, such as “grants or incentives for private sector repairs”.

#### **VAT reforms**

Some respondents noted that charging VAT on repairs to existing properties “is clearly a disincentive” and “actively discourages repair and renovation of existing buildings”. There was consensus that VAT on repairs to existing properties should be reduced or removed.

“The Scottish Government needs to address and rectify the inequity of VAT liabilities on existing buildings. We feel that applying VAT on housing repairs, refurbishments, conversions of existing property and not on new build harms retrofitting and refurbishment.” - *Private landowner*

Again, a few respondents commented that the private sector compares poorly to social housing, and the Government could consider how tax incentives or regulations could be used to encourage the private sector to follow the better practice of the social housing sector.

### **Enforcing the standards**

As well as providing financial assistance to support private landlords and owner occupiers to carry out repairs, there was a clear feeling among respondents that more needed to be done to compel owner occupiers and private landlords to maintain their property adequately.

Many respondents called for greater support and/or resources for local authorities to enable them to apply the enforcement powers they have under the Housing (Scotland) Act 2006 where property owners fail to undertake critical repairs.

Other respondents suggested that local authorities should penalise property owners through, for example, fines, an increase in council tax, or a charge made for compulsory work carried out, where they fail to adequately maintain their housing.

A few felt that local authorities should have compulsory purchase or lease powers where a property is at risk of disrepair to enforce against the neglect and abandonment of our existing buildings. Another suggestion made by a few respondents was to give more power to tenants to compel landlords to carry out necessary repairs, or to carry out the work themselves and deduct the expenses from their landlord.

A few respondents suggested that mortgage providers could play a role in obliging property owners to undertake repairs and maintenance work. One suggestion was made, for example, that mortgage providers should take into account the future repair and maintenance costs of a property when carrying out affordability checks at the approval stage, and another was that conditions related to property maintenance could be built into mortgage agreements.

In terms of the private rented sector specifically, some respondents suggested that the process for registration of landlords could be strengthened to ensure that they maintain their properties adequately. The view was that the registration process is currently quite light touch, and a stricter system could be implemented.

“A landlord is not currently required to submit/upload any of the certificates/checks that they are required to undertake when they seek a landlord registration, instead they are only required to confirm that they have done them... this approach allows the less trustworthy landlords to bypass undertaking these checks.” - *Local authority*

“PRS licencing should include a system for enforcing quality standards – the cost of enforcement should be added to the licence cost rather than passed on to the Local Authority.” - *Local third/community sector organisation*

## Shared ownership blocks

Shared ownership blocks, with flats owned by different landlords and owner occupiers, were singled out by some respondents as presenting difficulties related to repairs and maintenance. Residents in these properties can encounter difficulties in arranging for repairs to be carried out unless all owners agree and contribute financially, which is not always straightforward. To address this, respondents made various suggestions, including the involvement of factors where appropriate, the introduction of mandatory owners’ or residents’ associations, a local authority-backed missing share scheme, mandatory communal building maintenance funds that owners must contribute to and, where appropriate, the involvement of factors to help facilitate these measures.

## Adaptations

Several respondents commented on the importance of ensuring that residents are able to make adaptations over time to their housing in response to their changing needs. This might include creating office space in order to work from home, extending a property to make space for a growing family, and/or adapting a property to react to reduced mobility caused by illness, disability or old age. This is an issue that we discuss in more detail in the analysis of Question 4 of the consultation.

## Skills development in construction and trades

Another theme identified by some respondents relates to skills development in construction and related trades. A few commented on a skills shortage in the sector, particularly as the UK leaves the EU and tighter restrictions on migrant labour are introduced. The importance of Scottish Government investment in education, training and skills in the sector was a theme highlighted by a few respondents.

“This investment will ensure we have a workforce capable of delivering high-quality buildings and manage and provide high-quality services.” - *Private landowner*

## Regulation of tradespeople

Regulation of tradespeople was another issue identified by a few respondents, in terms of:

- legislating for minimum standards of work with penalties for companies that do not meet these standards;
- providing routes for residents to seek recompense when sub-standard work is completed; and

- ensuring that tradespeople involved in the work have achieved a minimum level of training and obtained recognised qualifications.

## **Innovative construction models**

There was a view among some respondents that making greater use of innovative construction models could help to enhance the quality, standards and state of repair of new housing. Most notably, respondents described off-site construction as a method with the potential to:

- increase quality and standards;
- save time and money; and
- increase productivity and reduce waste.

We also discuss the potential of innovative construction models in the analysis of Question 3.

## **New build housing**

Many respondents made comments specifically related to improving the quality and standards of new build housing in response to this question.

One suggestion provided was awarding contracts for new build social housing to smaller, local housing builders, rather than relying on a small number of large, national builders. One respondent noted, for example, that small and medium-sized builders might require capacity building support to help them develop bids that can compete with larger builders that employ bid consultants/staff.

A few respondents commented on Housing for Varying Needs, which provides spatial standards for new build social housing. There was a feeling among a few respondents that these standards should be reviewed and refreshed, and extended to the private sector, to ensure that private developers cannot circumvent design standards for reasons of profitability.

A few also commented that there should be more governmental regulation over the quality and energy efficiency of the materials used in new build developments, with a particular focus on reducing the amount of plastic and MDF used in construction.

Some respondents felt that more should be done to ensure that new build developments suit local needs and contribute to the local community. A few noted the importance of ensuring that the views of local communities are taken into account when making planning decisions, and that local authorities are empowered and resourced to enable forms of development which seek to enhance existing places, and to resist poor quality housing that is not sustainable and does not contribute to the quality of our places.

Some suggested the need for a more formal inspection process for new build homes (in the social and private sectors) to ensure they meet quality standards, along with rights for residents to address snagging issues.

## Empty homes

Another theme identified by some respondents was the importance of bringing empty homes back into use which would provide valuable additional housing stock. A few noted that this would reduce the antisocial behaviour and vandalism that empty homes sometimes attracts. A few respondents felt there was a role for central government in supporting local authorities and housing associations to acquire empty homes.

“The Scottish Government must be bolder with enabling legislation such as enforced sale or a quicker, more streamlined version of compulsory purchase once a home has been empty for a period of time.” - *Local authority*

“We recommend an incentive/ enforcement regime to reduce numbers of empty private houses. Support should be enhanced for Local Authorities and Housing Associations to acquire empty private housing.” - *Health and social care body or professional/umbrella body*

A few referred to the Council Tax levy and noted the importance of this in disincentivising owners retaining empty properties.

“The current Council Tax levy on empty homes should be continued and enforced throughout Scotland to de incentivise having these out of the housing system for use.” - *Local authority*

Another suggestion from a few respondents was that local authorities should invest more in empty homes, for example by appointing Empty Homes Officers in every local authority. A few others suggested providing financial assistance to support the re-introduction of empty homes into Scotland’s housing stock.

“We need to provide loans and grants to help bring empty homes back into use. The introduction of the Empty Homes Loan Fund was welcomed but property owners haven’t engaged due to the conditions of the loan.” - *Local authority*

## **Analysis of Question 7. Do you have any proposals that would improve the space around our homes and promote connected places and vibrant communities?**

Consultation respondents felt strongly that the space around our homes can play a significant role in promoting connected places and vibrant communities, in enhancing individuals' health and wellbeing, and in responding to the climate emergency.

“The Scottish Government must invest in housing solutions that enable people to live well and contribute to the ecological sustainability of our planet.” - *Private landowner*

“Well-designed places play a key role in ensuring wellbeing, delivering positive health outcomes, creating social connections and providing access to services.” - *Health and social care body or professional/umbrella body*

### **Access to shared green and/or open spaces**

A common theme among respondents was the importance of ensuring that people have access to green and/or shared open spaces around their homes. Many respondents commented that green and open spaces provide valuable opportunities to enhance individuals' physical and mental wellbeing, to undertake activities that address the climate emergency, and in the provision of communal facilities.

“Open space should be capable of serving a range of functions including sport and leisure, socialising, habitat creation and food growing.” - *Local authority*

### **Communal spaces versus private gardens**

There was some disagreement amongst respondents over the relative merits of private gardens and communal green spaces. A few placed more emphasis on private gardens, however, the consensus was that the focus should be on communal spaces that include shared facilities and opportunities for interaction.

“Clean, green, safe places should be provided on new developments but it sometimes may be preferable to combine these over several developments to create larger, more useable spaces.” - *Registered social landlord*

### **Green/open spaces and climate change**

There was consensus among many respondents that green and open spaces could help to address the climate emergency, by reducing the risk of floods, providing

spaces that promote biodiversity and healthy ecosystems, and enabling communities to take part in environmentally friendly activities.

### **Flood risk**

Some respondents emphasised the importance of green and open spaces in reducing the risk of floods by ensuring that the land can soak up excess water. A few referred to the issue of 'urban creep' where green spaces are being reduced through people paving over their gardens, and noted that ensuring there is adequate communal green space could help to negate the negative impacts of this on flood management.

“The space around our homes could be used for better surface water management by ensuring permeable green space is retained, giving multiple benefits in terms of reduce flood risk, biodiversity, air quality and heat reduction.” - *Local authority*

### **Promoting biodiversity and healthy ecosystems**

Some respondents commented that spaces around our homes could be used to promote biodiversity and healthy ecosystems by providing space for trees, plants and wildlife.

“[There should be] areas that promote a healthy eco-system (e.g. wild flowers for pollinators, water for animal life, retention of dead matter for insect life). It could also combine housing needs with carbon sequestration (e.g. new woodland creation, peatland restoration).” - *Local third/community sector organisation*

“Garden ground, green networks, tree planting and Sustainable Drainage Systems (Suds) have key roles in climate change adaptation, in addition to enhancing biodiversity and the amenity value of an area.” - *Local authority*

### **Community-based environmental activities**

A recurring theme among many respondents was the importance of encouraging communities to take part in environmentally-friendly activities on the green and open spaces around their homes. Ideas included tree planting, community allotments and gardening projects, recycling and food growing initiatives.

“It’s important to lower carbon emissions by engaging the community in activities such as tree planting, intergenerational gardening and recycling. We think that encouraging these activities can educate and promote environmentally friendly behaviours.” - *National third sector organisation*

“Allowing simply for ‘green spaces’ within future housing developments will not help significantly to address the global climate emergency... Community groups with aspirations to develop local food growing on a larger scale should be supported by public funds on a timescale of at least five years to form partnerships with the owners of suitable land, train more local people in producing and preparing food themselves, and develop outlets in the community for their produce... The increase in collaborative activity will benefit communities and ‘food miles’ will be reduced.” - *Individual*

A few noted that green spaces could further promote other environmentally friendly behaviours in communities by, for example, providing community recycling and laundry facilities.

### **Green/open spaces and wellbeing**

Many respondents referred to the positive impacts that green and open spaces can have on physical and mental health and wellbeing, with some respondents discussed the importance of green and open spaces for children in particular.

Some pointed to the potential of green and open spaces in encouraging interaction between people, thereby reducing loneliness and social isolation. A few referred specifically to the potential of intergenerational projects including tree planting, gardening and recycling to “bring younger and older people together”.

Another respondent suggested that community food growing initiatives could help to increase access to fresh, healthy food and thereby reduce inequalities of access. Others said that green and open spaces provide important activities for people to be active and take part in exercise (we return to this issue later in this chapter).

“Planning for new development and regeneration projects should require placing more emphasis on creating sustainable outdoor spaces and encourage the community to stay active.” - *Registered social landlord*

### **Community centres**

As well as communal green and open spaces, some respondents commented that community buildings are also important. These can provide a space for community groups and clubs to meet and for social events to be held.

“Community facilities, halls and centres where groups can meet and have access to resources for various groups to flourish.” - *Local third/community sector organisation*

## Empowering communities to manage shared green and open spaces

Some respondents identified a role for community members and organisations in planning, developing and maintaining shared spaces (including green and open spaces and community centres), particularly in the context of local authority budget shortages which can detract from the maintenance of these spaces.

“To have connected and vibrant communities it is essential that communities are empowered to shape and influence proposals.” - *National third sector organisation*

“There needs to be proper management and/or factoring of open spaces, with local organisations being encouraged/commissioned to manage these.” - *Registered social landlord*

A few suggested that communities should take the lead in planning events and activities that would make use of communal green and open spaces.

“Communities should be encouraged and supported to provide opportunities for regular and periodical social interactive events for everyone to engage in and which promote a strong community values which underpin these events.” - *Local third/community sector organisation*

There was a view expressed by some respondents that involving the community in the day-to-day maintenance and management of shared spaces could help to foster a sense of community pride and belonging.

“Help communities to be proud of their area by actively working together, aiding local groups to be set up to make areas litter free, safe play areas for children, green areas and policed.” - *Individual*

A few respondents acknowledged that communities might require funding, training and support to empower them to take on this role.

“Communities require capacity building to have the skills, confidence and knowledge to be equal partners in this process. This requires adequate funding, training, information and support to be in place.” - *National third sector organisation*

A few respondents suggested that registered social landlords could act as community anchors, working with and supporting local communities and residents to deliver community projects.

## Active and sustainable travel

A common theme discussed by many respondents was the importance of ensuring that spaces around homes provide the infrastructure for active and sustainable modes of transport, including:

- well-lit and safe walking and cycling routes;
- charging points for electric vehicles;
- community car and bicycle sharing schemes;
- areas for secure bicycle storage; and
- easy access to reliable and affordable public transport.

Other suggestions from respondents included prioritising opportunities for active and sustainable travel, including improve cycle networks; active travel connectivity, public transport connectivity close to where people live; electric vehicle infrastructure; and opportunities for car-share, bicycle-share and electric bike schemes.

### **Benefits of active and sustainable travel in addressing the climate emergency**

Many respondents described the importance of active and sustainable travel in helping to address the climate emergency. A recurring theme was that these modes of travel enable and encourage households to reduce their carbon footprint, most notably by reducing their reliance on cars powered by conventional combustion engines.

“Take climate action – walking is a carbon neutral mode of travel. Walking is also the best link to mass transit modes and the more people who choose to walk, the less people are travelling by more polluting forms of transport particularly for the first and last mile of a journey. Equally, the infrastructure requirements for walking require less embedded carbon.” - *National third sector organisation*

“The importance of combating car dominance in residential developments is paramount to address the climate emergency and create more sustainable, connected and welcoming places to live.” - *Local authority*

### **Benefits of active and sustainable travel for public health and wellbeing**

Many respondents also described the benefits of active and sustainable travel for public health and wellbeing. Active modes of transport provide an opportunity for people to take exercise, which has benefits for their physical and mental health.

Another important benefit, noted by many respondents, was the positive impact that active and sustainable travel can have on community connectedness and social isolation. Respondents stressed that reducing reliance on cars, and making it easier and safer for people to move around on foot, bicycle or public transport, results in increased opportunities for social interaction which can help to reduce feelings of isolation.

“Connected places and communities are extremely important for the wellbeing of those who live in that area. If there is poor public transport provision, people are much more likely to be housebound. If the pavements are in a poor state of repair or there aren’t enough street lights, or there are hills and steps, then older people are much more likely to be isolated.” - *National third sector organisation*

“Places that are poorly connected to active travel networks, public transport links and community facilities can add to feelings of isolation and exclusion. New developments should be barrier free, encourage active travel for people of all abilities and include links to the green network.” - *Local authority*

## Access to services and amenities

A recurring theme among many respondents was the importance of ensuring that spaces around homes should facilitate easy access to services and amenities including shops, exercise and leisure facilities, employment opportunities, post offices, restaurants, pubs, education, healthcare and cultural activities. Many respondents felt that people should be able to access these services using active and sustainable modes of travel.

“The provision of housing should also be directly linked to that of services. Whether this is local, accessible shops or larger scale interlinked transport options, successful planning on both a local and national infrastructure level would be key to achieving this. Low cost, accessible public transport options would also be key to achieving this.” - *Local authority*

A few respondents referred to the principle of a ‘5-10 minute walking neighbourhood’ or the ‘20-minute neighbourhood’. This idea is based on the concept that residents should be able to access all essential amenities within a reasonable time by foot, bicycle or public transport.

“The 20-minute neighbourhood concept is that all people in cities and towns should live in homes within a 20-minute walk (or bike ride) from their everyday amenities like schools, shops, green space, and health services... It is in successful operation in neighbourhoods in urban centres such Melbourne, Freiburg im Breisgau (Germany), and Portland, Oregon... There are different concepts of a 20-minute neighbourhood – depending on the amenities, it can be a 20-minute walk, cycle or bus ride. Key to success is housing densities. These should be a minimum of 22-25 dwellings per hectare.” - *National third sector organisation*

## Community safety

There was consensus among respondents that promoting the use of green and open spaces as well as active and sustainable travel opportunities is important for the health and wellbeing of residents as well as the environment. However, some noted that people need to feel safe in order to use green and open spaces and active and sustainable modes of travel.

A few respondents referred specifically to the importance of ensuring that green and open spaces are safe to enable children to use them. Other comments around community safety related to local policing. One respondent, for example, called for a higher police presence for a feeling of community safety and another said it was important to have local police who know the people in their patch.

Other comments focused on practical elements of the design of green and open spaces that could enhance people's feelings of safety, including adequate lighting, paving, and locating green and open spaces in visible and busy locations.

## Specific groups

We discuss the housing needs of specific groups, including older and disabled people in our analysis of Question 6, but it is worth noting here that a few respondents made comments specifically about how spaces around homes can be adapted to suit the needs of these groups.

A few respondents identified the needs of people with dementia, with particular reference to the principles of Dementia Friendly Communities and how these might influence the design of outdoor spaces to enhance their accessibility and functionality for people with dementia.

Some others spoke about older people more generally and the importance of communal facilities, especially in housing designed specifically for older people.

“There is a range of work ongoing to make the most of communal facilities in older people's housing to reduce isolation and reduce loneliness which can impact on physical and mental health. Such facilities could be used for social activities or for health services. This would bring services closer to people and generate an income for residents' and tenants' groups.” - *Local authority*

A few described alternative housing models that use the space around homes to promote access to services and social interaction. For example, describing park home communities which often, through residents' associations, provide for their own needs in terms of welfare, education, fitness, transport, entertainment and leisure. Co-operative and shared housing models were also cited positively.

Another respondent referred to the benefits of a 'core and cluster' model, where self-contained mixed accommodation has a central community 'core' that can incorporate shops and other community based services such as health and wellbeing services other community groups and businesses, for example, libraries, hairdressers, gymnasiums.

One respondent commented that consideration needs to be given to the materials used in the spaces around homes to ensure they are suitable and accessible for all groups including older people, disabled people and people with health conditions.

## Town planning

A common theme among some respondents was the role that local authority planning services could play in ensuring that spaces around homes meet the needs of communities and promote use of green/open space, active and sustainable modes of travel, and easy access to services.

“Planners need the knowledge, skill and experience to define and control strategic infrastructure, recognise what makes an effective street composition, [and] encourage the right mix of uses, house types and tenures.” - *Architects and design/development organisation and professional/umbrella organisation*

### **Meaningful community consultation**

Some respondents emphasised the need for meaningful community consultation in planning processes to ensure that new developments meet the needs of local communities. A minority referred to the Place Standard specifically as an important tool in facilitating community involvement and in ensuring that spaces meet the needs of communities.

“Scottish Government needs to take opportunities to co-ordinate communities’ engagement in processes which shape their places and to get more people involved, for example through the Place Standard, which is proven as an effective tool for the engagement of a broad cross section of society including of seldom heard groups and young people in both community and development planning.” - *Architects and design/development organisation and professional/umbrella organisation*

### **Planning and developers**

A few respondents observed that planners could place requirements on developers that would enhance the design of open and shared spaces in new developments, including issues around access to green spaces, active travel, public transport and local services.

“Ensure developers are required to plant trees/shrubbery (native) and wild flowers as a minimum whenever a new build scheme is erected. Ensure that active travel and public transport is adhered to as part of these new builds.” - *Individual*

“Planners should ensure that adequate retail and community space is provided in larger developments and also that this and other infrastructure provision (e.g. transport links, schools and health centres) does not lag behind housing development... There needs to be transparency by developers about the use and spending of money in the ‘amenity’ fund (from Section 75 payments) for new developments.” - *Registered social landlord*

### **Planning and health and wellbeing**

Another theme identified by some respondents was the influence that planning decisions can have on residents’ health and wellbeing, in terms of enabling access to green and open spaces, active and sustainable travel and services and amenities. For example, one respondent suggested that health professionals could be more involved in planning decisions.

“Planners should work with Occupational Therapists and public health colleagues to design environments that support good physical and mental health for all, and enable access to work and leisure destinations.” - *Health and social care body or professional/umbrella body*

A few respondents referred to fast food outlets in particular, and suggested that planning decisions could play a role in reducing accessibility to these, thereby helping to address issues around obesity.

“We know that areas of high deprivation have greater concentrations of fast food restaurants and advertising compared to more affluent areas. Therefore, children who live in these areas are more likely to be exposed fast food on a regular basis which can have a significant impact on their diet, affecting health outcomes later in life. The Scottish Government should consider ways to limit the presence of fast food restaurants and advertising in these areas while promoting access to affordable, healthy food options for all children, young people and their families.” - *National third sector organisation*

### **Example of an idea: living towns**

One respondent gave a very detailed account of their proposals to develop ‘living towns’ with easy access to amenities and services as well as opportunities for active and sustainable travel. Their response is below.

#### “Background

Reshaping and regenerating our town centres is one of four key pillars in our plan for delivering economic regeneration in [our local authority area]. This aligns with the national priority of putting town centres first. We aim to create ‘living towns’, driving investment into both new housing in and around town centres and into the conversion and refurbishment of existing town centre buildings. Reshaping our towns in this way has a wide range of social and economic benefits and will provide for truly sustainable homes and communities – making best use of existing resources (buildings and infrastructure, including public transport and active travel routes) and allowing homes to be built at greater density and in closer proximity to amenities and services.

However, we are constrained in doing so by a number of factors. These include difficulties in connecting to utilities (current Scottish Water policy prevents developers discharging surface water into combined sewers, which are often the only viable way of doing so in town centres) but also by the high costs of conversion/refurbishment, which are typically greater than for new build. Our proposal is for town centres to be put first by a series of measures which make developing town centre housing viable.

Three specific measures are proposed:

- Increased subsidy for town centre sites, to reflect the additional costs and risks, and the priority which should be given to town centre development
- Relaxation of Scottish Water Surface Water Policy for town centre sites
- VAT reclaim for town centre sites – investment in existing buildings attracts VAT at 20%; the Scottish Government should lobby for a reduction to 0% for town centre works but in the meantime could rebate 10% of the VAT paid, representing the half of VAT receipts raised in Scotland which is assigned to the Scottish Government budget

Who needs to make it happen and what type of action is required?

The Scottish Government should action the measures proposed above.

Scottish Water should consider its Surface Water Policy, which is prohibiting development sites generally, but particularly in town centres where watercourses are often significant distances from sites.

How much will it cost and who will pay?

A full cost analysis would have to be carried out by the Scottish Government. This could be done by collating priority sites/developments proposed by local authorities and trialled on a pilot basis. While on the face of it, the proposal to rebate VAT could be seen as reducing Scottish Government revenues, it is likely that the impact would be muted - as many schemes may not be viable without it, and additional revenues (business rates, income tax from job creation etc.) would be raised.

Who is needed to do the work?

Scottish Government officials in partnership with other agencies and local authorities.

How long would the proposal take to implement and is it a temporary or a permanent measure?

These proposals could be considered and developed within 12 months. In some instances (e.g. VAT proposal) enabling legislation may take longer to be developed and implemented.

When in the period 2021 to 2040 should it begin and does anything need to be done first?

Work should begin immediately.

Who will benefit? Who might lose out and how could this be mitigated?

Town centre regeneration benefits all in our communities, but particularly lower-income groups and our ageing population, which will benefit from improved local services and increased economic opportunity. Our early consultation suggests that town centre housing will be particularly attractive to younger and older households, providing housing options for the start and end of residents' housing careers. These groups currently have a lack of market opportunities and this approach would provide greater fairness and equity in the housing market.

How does it help deliver the draft vision? Does it align with draft principles?

It aligns particularly with principles 10 and 12." - *Local authority*

# Conclusions

In July 2019, the Scottish Government published its draft vision for our homes and communities in 2040. Between 2 December 2019 and 28 February 2020, Scottish Government undertook a public consultation process on the draft vision which included eight open-ended questions about the vision.

Some 202 responses were received to the consultation and this report presented the analysis from this consultation process.

Responses received were detailed and balanced, and there was significant consensus across the responses and across sectors. As noted in the introduction to this report, there were no significant variations in response between sectors, or significant tensions between responses. There was a great deal of commonality in relation to proposals made for change and future development. Many constructive, creative and innovative suggestions were made for future developments. This is encouraging, and a positive position from which to move forward.

## Visions and Principles

There were 166 responses to this question, 22 from individuals and 144 from organisations.

In general, the draft vision and principles were broadly supported by respondents and received praise for being both ambitious and comprehensive. Some respondents expressed doubt over how realistic and achievable the aims were given the challenges that the housing sector faces. In some cases, respondents suggested revisions to the particular phrases in the draft vision and principles in order to strengthen statements or clarify points further.

## Comments on the scenarios and resilience of the route map

Respondents' comments on the scenarios and resilience of the Housing to 2040 route map or constraints were disparate, with mixed views expressed within all respondent types, i.e. there were no obvious trends or preferences by sector interest, which is, of itself, interesting.

The most commonly discussed themes included Scotland's ageing population and the challenges this poses for the housing sector in ensuring that people can adapt their homes to meet their needs as they get older. There were also comments related to the challenges presented by various social, economic and environmental trends, including the increasing proportion of single person households, the gap between life expectancy and healthy life expectancy, the growth of holiday lets and student accommodation, and climate change.

Other themes that were identified as relevant across Scotland, but particularly in rural communities, included availability of affordable high-speed internet, access to active and sustainable travel, and depopulation.

Some respondents commented about the cost of achieving the Housing to 2040 vision, with a sense that local authorities will require financial support from the Scottish Government to deliver the vision, while others emphasised the importance of enhancing the skills and availability of construction and trades workers, particularly in the context of Brexit.

## **Proposals for increasing the affordability of housing in the future**

Many respondents called for affordability to be more clearly defined in relation to housing and for there to be a common definition to which everyone could work.

Some respondents considered increasing the supply of housing to be key to improving affordability, while others suggested that a range of factors needed to be implemented. These included maximising the benefit of public sites; implementing a range of more innovative construction methods (such as off-site construction); enabling more investment and offering incentives; increasing support for home-buyers and home ownership; and making changes to taxation, with LBTT being most commonly cited.

## **Proposals for increasing the accessibility of existing and new housing for older and disabled people**

Many respondents identified a significant shortage of accessible housing and the need for this to be addressed. Comments were made in relation to both existing and new housing.

Many respondents emphasised the need to make adaptations to existing housing stock but recognised that this was challenging due to a range of factors including cost and planning constraints. Nevertheless, a range of specific suggestions were made, including adaptations such as widening doorways, installing showers as standard and installing charging points for electric wheelchairs.

There were mixed views in relation to the development of new housing – with some respondents arguing that all future housing should be fully accessible, and others arguing that investment should focus on a minimum number of units. Many agreed that building in flexibility at the outset, to allow for changes based on need to be made at later points was desirable.

Some respondents suggested that alternative building types and methods could improve accessibility, for example co-housing models, and incorporation of more communal spaces into new build developments.

Others advocated for more self-build opportunities since these can offer more affordable, flexible options and can be tailored to meet individual needs.

A few respondents raised issues pertinent to specific groups, including people living with dementia, people with motor neurone disease, people with learning disabilities and gypsy/travellers, and called for their need for accessible housing to be better met in future.

Some respondents highlighted a need for better regulation of adaptations and new housing – suggesting that further prescription was needed from Government, that regulations should apply across tenures, and that meaningful targets should be set. Some called for a single government framework for adaptations regardless of tenure. However, some respondents also highlighted challenges with enforcement.

Other issues raised included calls for further support for independent living; support to people wishing to downsize; and the increased use of technology to improve accessibility.

## **Proposals to help Scottish Government to respond to the global climate emergency by increasing the energy efficiency and warmth and lowering carbon emissions of existing and new housing**

Respondents provided a wide range of detailed suggestions to help the Scottish Government respond to the global climate emergency.

Key issues raised included the need for greater regulation and higher standards to be applied to new build housing, ensuring that adaptations are made to existing housing stock and the importance of trialling new construction methods to enhance energy efficiency and reduce carbon emissions.

Respondents also discussed the need to ensure a transition from oil and gas to other energy forms, tensions between energy efficiency and heritage and the need for a mix of regulation and monitoring alongside education, advice and financial support across all tenures.

## **Proposals to improve the quality, standards and state of repair of existing and new housing**

The most common suggestions for improving the quality, standard and state of repair of housing focused on repairing and maintaining existing housing stock. Respondents emphasised the importance of developing a single set of standards for maintenance across all tenures. Various penalties, such as fines or increased Council Tax, and incentives, such as loans and grants, to encourage owners to maintain their properties adequately were suggested.

Many felt that local authorities need more resources and support to apply their enforcement powers when owners do not undertake critical repairs.

Energy efficiency was a key consideration, with some respondents noting that the standards for maintenance should encompass improvements designed to enhance a property's energy efficiency, while some noted that existing housing should be upgraded to meet the same standards as new build properties, especially in terms of energy efficiency.

Other suggestions included enhancing the skills of people working in the construction industry and related trades, introducing greater regulation of tradespeople, exploring the use of innovative construction models such as off-site

construction, bringing empty homes back into use, and various measures to improve the quality of new build housing such as reviewing and refreshing the standards set out in Housing for Varying Needs.

## **Proposals to improve the space around our homes and promote connected places and vibrant communities**

There was a strong emphasis among many respondents on the importance of shared green and/or open spaces in improving the areas around our homes and promoting connected places and vibrant communities. There was a common view that shared green and open spaces can contribute to climate change adaptation and mitigation, as well as promoting physical and mental health and wellbeing among residents.

Many respondents also identified the importance of spaces around homes being designed to enable people to access active modes of travel and/or public transport safely and easily. Respondents noted that this might require enhancements to local infrastructure, such as upgrading street lighting or cycle paths.

Again, respondents emphasised the benefits of active and sustainable travel for climate change and health and wellbeing.

Another recurring viewpoint was that spaces around homes should enable easy access to services and amenities such as shops, exercise and leisure facilities, education and healthcare.

## **Next steps**

The findings from the housing to 2040 consultation will inform the final vision for, and route map, to 2040.

# Appendix 1: List of organisations that responded to the consultation

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## **Academics**

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Common Weal and The Energy Poverty Research initiative (EPRi)

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HCI Skills Gateway, Edinburgh & SE Scotland City Region Deal

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Institute for Sustainable Construction, Edinburgh Napier University

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## **Architects, design/development organisations and professional/umbrella organisations**

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Anderson Bell Christie

---

Andrew Woodburn Development & Regeneration Consulting

---

Arcadis

---

Architecture & Design Scotland

---

British Blind and Shutter Association

---

Chartered Institute of Housing Scotland

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Construction Industry Training Board

---

Existing Homes Alliance Scotland

---

Fraser/Livingstone Architects, The Common Weal and Scotland's Towns Partnership

---

Heads of Planning Scotland

---

Heat Pump Association

---

Homes for Scotland

---

Liquid Gas UK

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NaCSBA

---

National House Building Council

---

Offsite Solutions Scotland Ltd

---

Places for People

---

Royal Institution of Chartered Surveyors

---

RTPI Scotland

---

Scottish Ecological Design Association

---

Scottish Property Federation

---

Sustainable Energy Association

---

The Institution of Civil Engineers, Scotland

---

The Nrgstyle Project

---

The Royal Incorporation of Architects in Scotland (RIAS)

---

UK Collaborative Centre for Housing Evidence (CaCHE) (Scotland KE Hub)

---

Whiteburn Projects

---

**Agencies, advisory groups and other national bodies**

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Accessible Housing Group

---

Age, Home and Community Monitoring and Advisory Group

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COSLA

---

Cross Party Group on Housing Sub Group

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Crown Estate Scotland

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Equality and Human Rights Commission

---

Highlands and Islands Enterprise

---

Historic Environment Scotland

---

Scottish Fire and Rescue Service

---

Scottish Land Commission

---

Scottish Natural Heritage

---

Scottish Parliamentary Working Group on Maintenance of Tenement Scheme Property

---

Scottish Water

---

Strathclyde Partnership for Transport

---

UNISON Scotland

---

**Health and social care bodies and professional/umbrella organisations**

---

Aberdeen City Health and Social Care Partnership

---

Dumfries and Galloway Health and Social Care Partnership

---

East Dunbartonshire Health and Social Care Partnership (EDHSCP)

---

Healthcare Improvement Scotland (ihub)

---

Housing Advisory Group and Homelessness Health Group on behalf of Healthcare Improvement Scotland and NHS Health Scotland

---

NHS Health Scotland

---

NHS Highland

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NHS Lothian Public Health

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Physical Disability & Long Term Conditions Team – Midlothian HSCP

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Royal College of Occupational Therapists

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Scottish Health Promotion Managers group endorsed by Scottish Directors of Public Health group

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Social Work Scotland

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**Local authorities**

---

Aberdeen City Council

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Aberdeenshire Council

---

Angus Council

---

Argyll and Bute Council

---

City of Edinburgh Council

---

Comhairle nan Eilean Siar

---

Dumfries and Galloway Council

---

East Dunbartonshire Council

---

East Lothian Council

---

East Renfrewshire Council

---

Falkirk Council

---

Fife Council

---

Glasgow City Council

---

Inverclyde Council

---

Midlothian Council

---

North Ayrshire Council

---

---

North Lanarkshire Council

---

Perth and Kinross Council

---

Renfrewshire Council

---

Scottish Borders Council

---

Shetland Islands Council

---

South Ayrshire Council

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South Lanarkshire Council

---

The Highland Council

---

The Metropolitan Glasgow Strategic Drainage Partnership (MGSDP)

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West Dunbartonshire Council & WDC Strategic Housing Providers Forum

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West Lothian Council

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**Local third/community sector organisations**

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A Cohousing group based in Edinburgh

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Astley Ainslie Community Trust

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Built Environment Forum Scotland

---

Central Scotland regional Network of Registered Tenants Organisations

---

East Ayrshire Federation of Tenants and Residents

---

Edinburgh Tenants Federation

---

Fife Federation of Tenants & Residents Association Ltd

---

Forward Mid

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---

Scottish Regional Network 3

---

South Harris Community Council

---

South Lanarkshire Tenant Participation Coordination Group (TPCG)

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Stirling Tenants Assembly

---

Sustainable Cupar

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The Highlands Small Communities Housing Trust

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The North Harris Trust

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The Pairc Trust

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Tenants of Dundee City Council

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TPAS / Regional Network 1 Consultation

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TPAS / Regional Network 2 Consultation

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West Harris Trust

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**National third sector organisations**

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2050 Climate Group

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Age Scotland

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ALACHO

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Alzheimer Scotland

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Care and Repair Scotland

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Child Poverty Action Group in Scotland

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Children in Scotland

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Citizens Advice Scotland

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Crisis

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Electrical Safety First

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Energy Action Scotland

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Generations Working Together

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Housing Options Scotland

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Housing Support Enabling Unit

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Inclusion Scotland/Glasgow Centre for Inclusive Living (joint response)

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Keep Scotland Beautiful

---

MND Scotland

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National Trust for Scotland

---

National Union of Students Scotland

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Outside the Box

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Paths for All

---

Rural Housing Scotland

---

Scottish Care

---

Scottish Cohousing Network

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Scottish Commission for People with Learning Disabilities (SCLD)

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Scottish Confederation of Park Home Residents Associations

---

Scottish Empty Homes Partnership

---

---

Scottish Women's Convention

---

Shared Lives Plus

---

Shelter Scotland

---

sportscotland

---

Sustrans Scotland

---

Tenants Information Service (TIS)

---

Tenement Action Group

---

Veterans Scotland Housing Group

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**Private companies**

---

Assemble Collective Self-build CIC

---

Carbon Dynamic (Scotland) Ltd

---

Changeworks

---

Mitsubishi Electric Europe B.V. UK Branch

---

Norscot Joinery Limited

---

Precon Bricks

---

Sesame Bankhall Group

---

SGN

---

SNRG Ltd

---

Tighean Inse Gall

---

xCONx

---

---

**Private landowners**

---

Kincardine Estate

---

Scottish Land & Estates

---

**Registered social landlords**

---

Blackwood Homes and Care

---

Craigdale Housing Association

---

Cunninghame Housing Association

---

Dalmuir Park Housing Association

---

Eildon Housing Association

---

Fyne Homes Ltd

---

Glasgow and West of Scotland Forum of Housing Associations

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Hebridean Housing Partnership

---

Home Group

---

Kingdom Group (Kingdom Housing Association)

---

Maryhill Housing Association

---

Orkney Housing Association - Residents Panel and Management Committee response

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Parkhead Housing Association

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Port of Leith Housing Association

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Scottish Borders Housing Association Ltd

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Scottish Federation of Housing Associations

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West Lothian Housing Network

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Western Isles Housing Association Community Forum

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**Trade associations**

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BEAMA Ltd

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Co-operatives UK

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STA

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UK Finance

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## Appendix 2: List of acronyms

Acronym	Meaning
4/5GDH	4 <sup>th</sup> /5 <sup>th</sup> Generation District Heating
AHSP	Affordable Housing Supply Programme
BPE	Building Performance Evaluation
CCLH	Co-operative and Community-led Housing
DDA	Disability Discrimination Act
EESHS	Energy Efficiency Standard for Social Housing
EHRC	Equality and Human Rights Commission
EPC	Energy Performance Certificate
EU	European Union
H&SC	Health & Social Care
LIFT	Low-cost Initiative for First-Time Buyers
LBTT	Land and Buildings Transaction Tax
MMC	Modern Methods of Construction
MND	Motor Neuron Disease
NHS	National Health Service
POE	Post-Occupancy Evaluation
PRS	Private Rented Sector
RBS	Royal Bank of Scotland
RCOT	Royal College Of Occupational Therapists
RIHF	Rural and Island Housing Fund
RPA	Resource Planning Assumption
RSL	Registered Social Landlord
SAP	Standard Assessment Procedure
SDLT	Stamp Duty Land Tax
SEPA	Scottish Environmental Protection Agency

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SGN	Scottish Gas Network
SHIP	Strategic Housing Investment Plan
SME	Small or Medium Sized Enterprise
TEC	Technologically Enabled Care
TRA	Transformational Regeneration Area
ULTDH	Ultra-Low Temperature District Heating
VAT	Value Added Tax
WC	Water Closet

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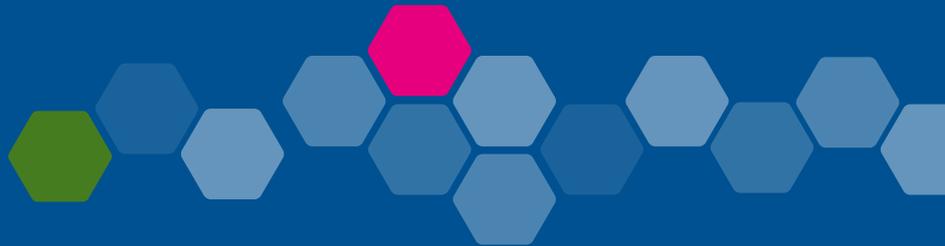
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This document is also available from our website at [www.gov.scot](http://www.gov.scot).  
ISBN: 978-1-80004-059-5

The Scottish Government  
St Andrew's House  
Edinburgh  
EH1 3DG

Produced for  
the Scottish Government  
by APS Group Scotland  
PPDAS50390 (03/21)  
Published by  
the Scottish Government,  
March 2021



Social Research series  
ISSN 2045-6964  
ISBN 978-1-80004-059-5

Web Publication  
[www.gov.scot/  
socialresearch](http://www.gov.scot/socialresearch)

PPDAS761026 (03/21)