



EDINBURGH TENANTS  
FEDERATION

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Edinburgh's Federation of Tenants' and Residents' Associations

## Housing to 2040

### ETF Response – February 2020

#### 1.0 Background

Edinburgh Tenants Federation (ETF) is the umbrella organisation for tenants' and residents' groups in the city of Edinburgh and a Registered Tenant Organisation (RTO). Our purpose is to represent tenants at a citywide policy level and we aim to promote the improvement of the quality of life of residents and the housing conditions of all tenants.

ETF held a Focus Group for members on Thursday 13<sup>th</sup> February 2020 to find out their views on the Scottish Government's Housing to 2040 consultation. This response represents the ETF members' views on the questions most relevant to attendees at the event and has been shared with the Federation's Executive Committee. ETF welcomes the opportunity to contribute to this discussion paper.

#### 2.0 Discussion 1: Visions and principles/challenges and constraints

##### 2.1 Do you have any comments on the draft vision and principles?

Overall we agree with the draft principles and would like Scottish Government to note:

- The overall aim is to put people at the heart of communities and decision making **BUT** we think that most decisions are made before there is any participation or consultation. Tenants need to see that their input is making a difference;
- All housing in Scotland should be improved, maintained and built to a high quality and standard;
- We want to see action and decisions made based on facts and community consultation;
- We want to see “deliverables” within the vision sooner rather than later;
- We want to see increased enforcement powers across all tenures to ensure housing meets current and future needs are linked to wider / other services & developers;
- We consider that new build housing should not be “private developer led” and at all times should be built to meet needs of all population / people on housing waiting lists etc;
- Social housing is required to meet the SHQS and EESSH, which we understand social landlords are working on. We therefore suggest:
  - Scottish Government introduces the same standards for the Private Rented and Owner Occupied Sectors. We consider this would require enforcement by the Scottish Government and potential changes in legislation, with Local Authorities or other body having powers to enforce the improvements required. There may also be a requirement for funding or interest free loans to allow owners to improve properties to standards that address climate change, safety and other standards.

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Edinburgh Tenants Federation is a Scottish Charitable Incorporated Organisation (SCIO) SC048236, regulated by the Scottish Charity Regulator (OSCR)

- Effective and thorough tenant participation, consultation and scrutiny should be integral to the vision to meet with the legislation introduced in 2001 and Scottish Social Housing Charter as well as community engagement standards. There should be effective monitoring and evaluation mechanisms in place to gauge what is working well and what if anything needs to be improved;
- Landlords and owners should be encouraged and supported to improve existing housing to meet the changing needs of occupants in terms of access, adaptations and use of properties to assist people stay in their own homes for longer;
- New build housing should be built to a standard that will meet varying and changing needs as above;
- Where new build housing is proposed in both social and private sectors, the Scottish Government, Local Authorities, Housing Associations and others should be consulted on whether this should go ahead in terms of:
  - Impacts on wider community and its infrastructure such as schools, access to public transport, GP and dentist surgeries, community facilities, open spaces and parking etc.
- We would also like the Scottish Government to note that we consider EDINDEX, the Common Housing Register for Edinburgh does not work effectively and people are on waiting lists for years, whilst some properties remain vacant. The Ed-index can only be completed on-line, which affects those who are not computer literate or do not have access to a computer.

### **3.0 Discussion 2: Towards a route map (policy proposals)**

#### **3.1 Do you have any proposals that would increase the affordability of housing in the future?**

Overall we welcome the development of new build properties within the Social Rented Sector but feel this does not meet the needs of people on waiting lists, we would therefore recommend:

- There is less student accommodation built in the city;
- Ensure rents are affordable;
- Mid–Market Rent new build, although meeting a need for some people, the cost of this housing is still out of reach of many people. We therefore recommend a cap is introduced on the amount of Mid–Market Rent properties that can be built in the city to allow a balance to be struck between the availability of social rent, Mid-Market Rent and Private Rented Housing;
- Council funding to invest in current and new housing is increased. Some of this could come from the money raised when land is sold for Private Sector Housing or other enterprises;
- Ensure current homes are at an acceptable standard before new homes are built;
- Consideration is given to what we mean by affordability. NOTE some people are living in poverty, even if in work due to high housing and related costs.

**3.2 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)?**

We understand there is a growing older people population and that much of our existing housing stock across all tenures is not suitable for the needs of disabled people of all ages. We would therefore like consideration to be given to:

- New build properties should have a minimum of 2 bedrooms or be able to be converted to a 2 bedroom in the future to:
  - Allow families to grow;
  - Allow children, grandchildren, carers to stay or live with people when required to assist them remain in their own home.
- Encouraging additional care and support requires to be integrated or having housing of a size and type that allows intergenerational living i.e. grans and grandads living with families but with a level of independence such as “granny flats”. This would mean that housing would need to be adaptable or built to make this happen;
- Current housing is adapted where possible, to allow people to remain in own home and community and have access to support networks;
- Scottish Government conducts an assessment of current and projected needs to ensure housing is adapted or built to suit specific or changing needs;
- A review of the usage and designation of housing for older people is carried out as in some areas this type of housing is not being used as intended, causing a clash of lifestyles in some areas or fewer services provided than previously (such as wardens / co-ordinators);
- The need for improved and better communication and budget sharing between, housing, health and social care etc. to ensure people can access housing and support needed at different times in life.

**3.3 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?**

- Ensure a higher standard of windows, doors, heating systems, insulation installed in current and new housing;
- New builds to be built using sustainable materials;
- Recycled materials used in housing investment projects i.e. plastic; incorporated into bricks, roads, pavements, play areas etc;
- Skilled people supervising and controlling new build and improvement works to ensure the highest standard and value for money;
- Wider use of renewable energy in housing and other developments;
- Information should be provided to children at primary school and increased communication with secondary school pupils.

**3.4 Do you have any proposals that would improve the quality, standards and state of repair in existing and new housing?**

- Increased inspections;
- Increased enforcement powers across all sectors to ensure housing meets standards of repair, energy efficiency and value for money etc;

- Changes in the law to encourage / enforce owners and private landlords to do the work that is required to their properties to meet high standards;
- Up to date Repairs Policies for landlords.

### **3.5 Do you have any proposals that would improve the space around our homes and promote connected places and vibrant communities?**

- Ensure there is space around people's homes to store all the refuse and recycling bins that we now have;
- Consider needs of people living in flats in terms of refuse collection and recycling;
- Increased powers to ensure people manage and maintain their own gardens and for council to so this work and recharge tenant / owner / private landlord;
- Ensure adequate parking spaces in communities for current and future homes;
- Work with communities to enhance play and recreational facilities and services such as: shops, schools, GP's Dentists, public transport, parks, community centres etc;
- Consider changes to and development of road layouts;
- Ensure there is public transport that connects communities;
- Listen to local people;
- Work with others to mitigate the effects of social problems such as drugs, antisocial behaviour, alcohol misuse and vandalism etc;
- Encourage and support communities to increase their involvement and work together to improve community spirit – MORE JOINT WORKING.

### **3.6 Do you have any other comments?**

- We are concerned about the amount of student accommodation being built when there are not enough houses for people to live in as their home;
- We think some new build projects are being rushed and therefore have concerns about its quality, future maintenance and investment costs and long term viability. All housing being built now should be built to last;
- We are concerned that the location of some housing may not be great in terms of climate change, potential flooding, dampness etc. if close to flood plains, canals, rivers and sea, etc;
- Child poverty is a real concern for us and poor housing exacerbates this. Scottish Government should be ensuring all children (and adults) live in safe, warm and affordable homes that allow them to flourish;
- Consideration is required on the housing and support needs of children with additional needs and how good quality, suitable housing can assist them and their families;
- We are concerned that high housing costs, high fuel costs, continual rent increases, no or limited increases in incomes have negative effects on peoples' lives, and this contributes to child poverty and deprivation. We therefore consider that the Scottish Government should be looking more at how a new housing system can improve circumstances such as:
  - High rents;
  - High heating costs;
  - Addressing issues caused by welfare reform;
  - Integrated transport and community facilities and services.

- We consider that social housing waiting lists and housing need does not always reflect the investment made in housing, especially in areas of high demand or suitability of location or type of housing. We recommend a thorough housing need and demand assessment is carried out across the country, and investment targeted at areas of most need;
- Scottish Government, Councils, Housing Associations and others need to evidence they are really listening to people and taking action to reflect their views, needs and concerns;
- We are concerned that some people are already struggling to pay rent or in rent arrears and therefore poverty, will little or no wage increases and Welfare Reform meaning people have less income in real terms;
- The Bedroom Tax is an issue for the Scottish Government:
  - How long can Discretionary Housing Payments be made?
  - People unable to downsize due to lack of suitable housing in areas needed, especially in social housing.
- We consider the Scottish Government needs to work with the UK Government and others to have the bedroom tax and Universal Credit removed;
- We are concerned that sheltered housing has changed and support services required are less – the Scottish Government needs to consider how people can live independently with support, as this will cost a lot less than people having to move into care homes or being unable to leave hospital.

## Respondent Information Form

**Please note this form must be completed and returned with your response.**

To find out how we handle your personal data, please see our privacy policy:

<https://beta.gov.scot/privacy/>

Are you responding as an individual or organisation?

- Individual
- Organisation

Full name or organisation's name

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The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

- Publish with name
- Publish response only (without name)

### Information for organisations:

The option 'Publish response only (without name)' is available for individual respondents only. If this option is selected, the organisation name will still be published.

- If you choose the option 'Do not publish response', your organisation name may still be listed as having responded to the consultation in, for example, the analysis report.
- Do not publish response