



Scottish Government consultation on Housing to 2040

GWSF response February 2020

Summary of key points

1. The Housing to 2040 process represents a huge opportunity to embark upon fundamental change to our housing system. Some elements of the change that is needed may face resistance and so will need commitment and leadership.
2. Changing the way in which home ownership is seen as a means of storing wealth, and creating a system of land supply for housing which places the public interest at its heart, are among the radical changes required.
3. But what's working doesn't need mended. Investment in new supply of social and affordable housing has proven highly successful in recent years and must be maintained, as should the focus on regenerating Scotland's most deprived areas. It is critical that the road to 2040 does not start with a cut in housing investment
4. New social housing needs sufficient subsidy to ensure it is affordable to people on low incomes and to allow high quality provision of the right homes in the right places.
5. A new approach is needed to supporting councils and housing associations to work in partnership to tackle poor conditions in privately owned tenements, particularly in pre-1919 blocks. This does not require any short term legislative change, and would demonstrate the Scottish Government's commitment to meeting climate change targets, as the least energy efficient homes are in the private sector.
6. Locally informed and locally owned approaches must continue to play a central part in how investment in both new and existing housing is used. Real placemaking usually needs a community anchor body to drive the process, and community controlled housing associations have an impressive track record fulfilling this role.
7. Health and social care's recognition of the preventative role of housing should be demonstrated by greater willingness to fund community-based support services which enable older people and others to live independently.
8. The best way of maximising access to social housing is to provide more of it. Pressures will grow as the drive to house homeless people more quickly continues, and access routes to social housing should be monitored to ensure that access through the homelessness route is proportionate to that through other routes.

1 Introduction

On behalf of its 65 member associations, GWSF welcomes the opportunity to respond to the consultation.

As well as hosting a pre-consultation workshop session on Housing to 2040 at our Annual Conference in November 2019, our response has been informed by the views of our Board and our wider membership, including through discussion at our open membership meeting in mid-January.

We applaud the intention of securing a public consensus on the way forward. Housing has normally proved to be a difficult topic on which to engage the wider public, and so it will be interesting to see to what extent this consultation process is able to achieve its aims on this front.

Likewise the stated aim of achieving cross-party consensus on the way forward is to be welcomed. Securing such consensus may prove difficult if a cornerstone of future policy is reduced investment in housing.

2 General comments: combining radical new approaches with what's already working

We do not think we will be alone in finding this consultation especially challenging. It both signals a wish to be truly radical – most obviously in wishing to see a well-functioning housing system, but at the same time clearly urges caution in relation to the 'many challenges' which exist, with 'business as usual not an option'.

It may even seem confusing to some respondents that bold, imaginative solutions are being sought at a time when there are signals that housing investment could be significantly reduced, and the Scottish Government has made an ultra-cautious response to recent proposals for tenement reform (which will require predominantly traditional solutions).

But on the face of it, the July vision document implicitly suggests that real system change may be embarked upon, and this is to be warmly welcomed. Some critical elements of our housing system require a radical, new approach, not least in terms of how home ownership is seen as a means to building wealth, and in the supply of land for housing.

There are other aspects of the housing system which are not failing. With the Scottish Government's 50,000 new supply target on track for the end of March 2021, as a minimum we need to see current investment levels sustained.

There is some implication in the consultation document that just round the corner lurks a hitherto unidentified means of addressing major housing problems with innovative, low cost solutions. But history suggests that there are some fundamental

principles around intervention to address housing market failure which are very unlikely to change markedly in the future:

- In capital terms new housing requires significant money, but with all the longer term benefits to people, communities and the economy, it remains a key form of preventative funding
- Truly affordable social housing requires relatively high levels of subsidy to keep the financing of borrowing manageable for tenants. Excepting the disastrous subsidy cuts around 2010-2012, Scotland has a good record on recognising this, in comparison with the rest of the UK.
- Investment in private housing should be a matter for owners, but commonly owned blocks invariably deteriorate without public intervention and financial incentives
- There has not been a single initiative in procurement of new build social housing, including efforts to achieve mass and scale, which has delivered measurable and replicable efficiencies. Procurement efficiencies will be marginal, and as a result of best practice being refined and promoted.

So whilst the scope for radical change in our overall housing system is substantial, levels of public investment in housing will *not* be shaped by approaches which no-one has previously thought of. Instead they will come from building on the recent successes. If, as the 2019 vision document suggests, the Scottish Government believes there are many barriers still being faced at the current time, and yet it wishes to reduce housing investment, it would be disingenuous for it to suggest that solutions to major housing problems are likely to be achieved in the next 20 years.

Innovation is likely to relate to specific initiatives, not to the housing system as a whole. The proposed initiative to address under occupation of larger family housing in Glasgow, which is described later in this response, is one such example of innovation which could be helpful.

3 Housing as a human right

GWSF is watching with interest the current debate on housing as a human right. It is a general principle we support, but it seems likely that the position on this will become clearer only with appropriate legislation.

We are wary, however, of the potential for human rights legislation to leave social landlords, amongst others, vulnerable to challenge when problems such as the shortage of affordable housing are not of their making: such legislation will help no-one.

It would not be right for the Scottish Government to legislate on housing and human rights but provide insufficient levels of housing investment. For this reason, whilst welcoming the general concept, we remain cautious about how the debate plays out in practice over the next few years.

4 The relationship between Housing to 2040 and the immediate post-2021 period

It seems clear to GWSF that Ministers are keen to separate out the longer term Housing to 2040 'road map' from the shorter term and more immediate issue of what happens to housing investment from April 2021 onwards, following the completion of the five-year, 50,000 homes programme. It is clear to us that this is why the original 'Housing Beyond 2021' process morphed into Housing to 2040.

Whilst GWSF appreciates the obvious differences between these two timelines, we think it is naive to suggest that the two are not closely linked. If the beginning of the journey to a new housing system in 2040 is marked by a dramatic fall in housing investment, this will very significantly affect our view of how committed the Scottish Government is to ensuring housing is a high political priority in the coming years. We cannot afford to see a situation where the most radical feature of the early part of the road to 2040 is a big cut in investment – thereby damaging the most successful element of the current housing system and casting aside one of the clearest policy achievements of the current administration.

For this reason the Forum makes no apology for the focus we, in partnership with other housing bodies, will be placing in the coming months on how housing is treated in the process which will culminate in the 2021/22 budget being announced around December 2020. It is neither desirable nor appropriate to divorce this from the Housing to 2040 process.

In this regard the early February 2020 announcement of £300 million housing investment for 2021/22 was very welcome. Our assumption is that this is a minimum sum to allow plans to be progressed, and a much more substantial sum will be confirmed in due course.

5 Taking steps to achieving a well-functioning housing system

GWSF warmly welcomes the first principle set out in the summer 2019 vision document, which states:

'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.'

Taken together with the second principle, which relates to government policy (through taxes and subsidies, for example) promoting house price stability, these statements illustrate the enormous potential scope for Housing to 2040 to identify the

right combination of legislative, policy and financial measures to achieve a housing system whose priority is to meet social objectives rather than being a vehicle for private profit.

At this stage it is difficult to be clear on exactly what mix of measures, and what period of time, will be needed to achieve this. But it will be seen as highly significant if, in the coming months, including in the lead up to the 2021 Scottish Election, Ministers signal their commitment to starting on the journey to this better housing system.

It is likely that a radical, new approach will include elements that represent a more interventionist approach, and some proposals may prove unpopular among some people and stakeholder organisations. But we would hope that the party political landscape in Scotland is such that sufficient consensus can be achieved on a way forward.

An example of the potential outcome of a radical approach is that it would be difficult for the Scottish Government to start to address the issue of housing being a means to storing wealth and still be giving money to people as a discount off buying a home privately. This is especially so when the evidence suggests this has had little impact on boosting the number of starter homes being built and has helped relatively few people at the lower end of the 'ladder'. A willingness to move away from this kind of electorally populist approach will be an early test of how genuinely committed Ministers are to a truly different vision for the housing system.

As with any radical new approach, a key challenge will be to what extent changes affect people in their current housing circumstances as opposed to signalling changes further into the future. We would imagine that it would be difficult to fully protect existing assets if the new approach is to take effect within a reasonable time period.

In the short to medium term we believe it would be helpful for Ministers to establish an expert group, in the way the Homelessness and Rough Sleeping Action Group was set up in 2018 to consider future homelessness policy, to make recommendations on both shorter and longer term tax and legislative changes needed to radically improve our housing system. As part of this approach, relevant data which already exists should be collated to inform the group's recommendations.

The supply of land for housing

It will also be important for early signals to be given that a radically new approach to the supply of land for housing will be developed. The Housing to 2040 process is the opportunity to begin the move away from a system that sees land valued for what it may be used for in the future, leading to speculative purchases and developers then holding onto land for long periods. This is not good for the housing market and not good for communities.

We welcome the call from the Scottish Land Commission and other bodies for the development of a system based on the principle that the assembly and allocation of land for housing must be in the public interest and led by the public sector. This overarching principle needs to be made into reality through mechanisms such as land value capture – i.e. using part of the uplift in value (that comes with planning permission) for public benefit such as the provision of green space and improved transport links.

Current/future powers relating to housing and the housing market

The task of making major housing market changes which will eventually mean that housing is not primarily a means to store wealth will put a sharp focus on the extent of current powers available to the Scottish Government. The hugely welcome abolition of the right to buy in 2016 was a radical use of existing powers and one which demonstrated a wish to move away from placing undue emphasis on home ownership at the cost of other tenures.

However, we think realism is needed here and that some aspects of a wholesale reform of the overall housing market system in Scotland are likely to be difficult under current powers. Furthermore, stronger or full tax powers would give no guarantee of helping achieve housing market reform, as much would depend on politicians' willingness to use those powers effectively.

6 Principles around capital investment in housing

It seems to be in the DNA of Ministers to be susceptible to being persuaded by officials that a more effective way of investing in housing is just within our grasp. But whilst innovative funding approaches are always welcome, we know from the past that addressing market failure in the housing system primarily requires subsidy.

Investment in new social housing works and should feature prominently post-2021 so as not to set in place a permanently lower scale of provision. We do, however, believe some realignment of investment priorities is necessary to create a new funding approach to tackling private housing, as covered below.

Issues around ensuring high quality homes, the right homes (e.g. larger family housing) and placemaking can only be embedded in the investment approach if there is a fit for purpose subsidy system. We cannot talk up the importance of these issues and then use subsidies which have the effect of squeezing providers to ignore or compromise on them. The higher the quality of the homes we build, the lower the longer term fuel and maintenance costs will be, directly supporting our efforts to keep rents affordable. Furthermore, we must ensure that lending across our sector remains at levels which are manageable and sustainable over the full period of the loans, so that we are not creating undue pressure on rents which only manifests itself in future years.

In Glasgow's Gorbals, thousands of homes built through innovative methods and unsustainable financing have been demolished within 20 to 40 years of their construction. By way of contrast, homes traditionally built and appropriately subsidised by the local CCHA nearly 30 years ago are still regarded locally as new build.

GWSF believes it is and will remain crucial to retain a clear link between housing investment and the ongoing need for the regeneration of areas of multiple deprivation. This is especially important if housing's contribution to alleviating child poverty and promoting inclusive growth is to continue.

This also means there is a very strong argument for retaining the share of future investment made in Glasgow and the west of Scotland. We recognise that there will always be specific arguments and demands from different areas, but what remains unchanged is the greater levels of poverty and deprivation in Glasgow and the west, and the consequent need for ongoing regeneration programmes with new social housing supply at their centre. The geography of deprivation in Glasgow and the west of Scotland is closely matched to the neighbourhoods where CCHAs are based. CCHAs own housing in the 20% most deprived data zones in Scotland, based on the Scottish Index of Multiple Deprivation.

A renewed focus on investment in regeneration should also facilitate appropriate alignment between the new build programme and the improvement of existing private sector housing, and, in particular, commonly owned blocks (as covered later in this response). Left to continue to deteriorate, poor private housing becomes a blight on the local area and also threatens a fundamental facet of the built heritage of our towns and cities.

Healthy levels of investment – in both new and improved homes – in the areas where GWSF members operate will continue to bring huge added value to our communities. When community controlled housing associations invest they do so with an intimate understanding of the wider needs of the area. Community empowerment becomes real and meaningful when it is communities building for communities: new build provision by local associations invariably brings with it a range of additional benefits for the community, including new open space, office and meeting space for local organisations, and employment and training opportunities.

A greater focus on quality and choice

Whilst overall quality, including space standards, remains far superior in the social sector than in private housing, it is concerning that our space standards in particular compare so badly with those of so many other European countries. The original Parker Morris standards are very much a thing of the past, and a review of the Building Regulations is needed with a view to arresting what seems to have become a race to the bottom on space within our homes.

The facilitation of digital connectivity too needs to become a standard element of how new homes are designed and built. Combined with cheaper 'social' broadband packages, the journey to making more and more low income households properly connected should become a standard part of the Scottish Government's approaches on child poverty and inclusive growth.

References to 'increasing choice' can sometimes seem clichéd, but on issues such as the availability of larger (four and five bedroom) family housing, they are critical. Those parts of Scotland – including Glasgow – making the greatest contribution to housing refugee households face the greatest shortages of larger housing. The system of subsidy needs to recognise this and not place undue barriers in the way of increasing the proportion of larger homes provided.

Future decisions – at a local authority level – on where to build new homes will increasingly need to recognise that, as expectations and aspirations continue to rise, some existing social housing will become more and more difficult to let and, eventually, obsolete. This applies most obviously to some post-war blocks. The fact that new build provision displaces need from less popular stock is clearly not a reason not to build, but a realistic, honest approach to hard to let stock is needed within Local Housing Strategies and Strategic Housing Investment Plans.

7 Local approaches led by communities

When innovation in housing investment is under discussion there is a common tendency for decision makers to look for 'at scale' solutions which, it is often argued, will bring down the unit cost of new development. This is misguided, firstly because any new approach – such as off-site construction and modular homes – will only account for a small proportion of the overall programme. And secondly because provision at scale carries with it the very significant risk that the role of meaningful placemaking will be relegated.

We must ensure that locally informed and locally owned approaches continue to play a central part in how investment in both new and existing housing is used. Real placemaking is unlikely to happen without the central involvement of one or more community anchor bodies to drive and facilitate the necessary processes, and in many areas community controlled housing associations have an impressive track record fulfilling this role.

History demonstrates that some of the greatest successes tackling difficult issues come from approaches that focus on a specific local area, and often led by the local housing association. The original Housing Action Area approach to tenemental improvement is one obvious example, with significant resources and, just as important, significant powers accompanying this status.

Although it may not always have been badged as such, community controlled housing associations have always been involved in placemaking. For the past four decades, this holistic approach, combining physical, economic and physical regeneration, with local people leading, has helped transform neighbourhoods and continues to do so.

GWSF very much welcomes the statement (in the summer 2019 vision document) that 'local communities should be empowered to respond to housing need in their area'. But there will sometimes be challenges in terms of different local and national priorities. Ideally, the setting of national priorities – including through legislation – will still leave leeway in how these are addressed locally. The Forum supports Scotland's strong homelessness laws but they are an example of where national priorities can make it less easy for our members to respond adequately to other types of housing need locally.

Democratic structures in Scotland, as in the rest of the UK, are such that the average number of people in each local authority, and then in each ward, is far greater than in most European countries. That makes truly community-based democracy extremely difficult to achieve, and community controlled housing associations are therefore an important vehicle through which significant and meaningful influence over many local issues can be exerted by local people.

This makes it all the more crucial that the diversity of the housing association sector in Scotland is nurtured and further developed, with community controlled housing associations continuing to flourish and be supported to do so. We are concerned at what we see as threats to sector diversity, with the most obvious example being the imminent demise of the 10,000-unit Dumfries and Galloway Housing Partnership as it is absorbed into the Wheatley Group.

So whilst local housing associations have long been used to dealing with the challenges of a growing role, not least as the volume and quality of public services (such as cleansing) decline in many areas, our members are keen that Ministers think openly about how associations can be vehicles for new ways of making things happen on the ground in our communities. As long as we ensure that we do not place an undue burden on the rents our tenants pay, we owe it to the people in our communities to maximise our role wherever possible, because we know 'local' is so often the most successful approach.

This makes 'wider role' funding sources particularly important to housing associations. It has been disappointing that so many of our member associations were unsuccessful in their recent bids to the Investing in Communities Fund. It would take only a relatively small amount of additional funding to facilitate many more initiatives which will help maximise the contribution local people make to improving their communities.

Mainstreaming placemaking

The use of a place making approach is still in its relative infancy and needs to be rolled out. This is as much about culture change as anything else, with significant scope for imaginative approaches to help organisations get over their silo thinking and bring things down to the right basics – ‘how do you want to feel when you walk down this street?’. We should better disseminate learning from what has worked in the recent past, such as the community activism that led to the regeneration of the Mid-Steeple Quarter in Dumfries, which started with the vision, through to the strategy and then the delivery, involving multiple partners but community-led.

A greater emphasis on local place plans will need resourcing, as planning departments do not want to raise expectations which they then cannot meet for lack of staff. One facet of place making is going to be the NIMBY challenge: if we are to provide the right homes in the right places, some gap sites and open spaces will need to be built on. This will require the right community development skills within local authorities so that they feel comfortable having conversations with communities on this.

8 Housing’s contribution to climate change targets

It is right that housing’s contribution to reducing carbon emissions should be maximised. The main challenge facing the Scottish Government is that the greatest gains will come from improving the energy efficiency of the 75% of our housing stock which is privately owned.

This is not to suggest that further improvements cannot be made to social housing. The second iteration of the Energy Efficiency Standard for Social Housing – EESSH 2 – will mean many homes achieving an EPC rating of ‘B’ in the coming years.

But there is a law of diminishing returns here, with some types of housing requiring what could be a disproportionate amount of expenditure to make relatively small gains in energy efficiency and in reducing fuel bills for tenants. The burden placed on tenants through their rents must not be unreasonable, as swapping fuel poverty for rent poverty must be avoided, and in any event social landlords already face immense pressure – not least from the Scottish Housing Regulator – to keep rents down.

In relation to private housing, energy efficiency has to be considered in the overall context of the condition of the stock. As set out in the next section of this response, GWSF believes that the most acute problems are in pre-1919 tenements, where serious disrepair such as to stonework and roofs will make the installation of energy efficiency measures extremely difficult in many cases. Initiatives which combine funding support for both repairs and energy efficiency, with work being carried out as one project, will often be the most effective approach.

9 The need to invest in existing private housing

GWSF welcomes the greater emphasis which the Scottish Government has recently been placing on the need to better maintain our existing housing stock.

The main issue at stake here is the 75% of Scotland's housing which is privately owned, as the general standard of stock owned by social landlords is high as a result of ongoing improvements to meet the Scottish Housing Quality Standard and Energy Efficiency Standard for Social Housing.

We recognise that, in principle, the condition of private housing is a matter for private owners. This is a reasonable principle to apply to self-contained properties, but the situation relating to commonly owned blocks is entirely different, as we know that the task of carrying out repair and improvement work is plagued by the difficulties of getting owners to work together and fund required maintenance.

The problems are especially acute in traditional pre-1919 tenements, which were the focus of our report in November 2019 – [The case for investing in tenement housing](#). Whilst we acknowledge that not all local authorities feel able to prioritise addressing poor private tenements, those that can do this have nowhere near enough resources to properly deal with even just the worst properties, despite usually having willing local housing associations with whom they can work in partnership on particular blocks/streets.

For this reason our report's main call was for the Scottish Government to introduce, from April 2021, direct, ring-fenced funding where a local authority has evidenced a strong case for investment and has active plans to work with local housing associations to take forward work to private and mixed tenure blocks.

We believe it would normally be appropriate for local authorities to demonstrate a willingness to invest some of their own resources such that the additional funding complements that.

10 Housing, health and social care

We know that housing, health and well-being are intrinsically linked. Bodies of evidence demonstrate that good housing is one of the essential lynchpins which helps support an individual's health and wellbeing. We also know that the preventative work which our members carry out in their role as community anchors is crucial. It makes a real and tangible difference to people's health and wellbeing, through a range of activities which enable them to stay at home, and in their communities, for as long as possible.

In our opinion, the biggest opportunity afforded by health and social care integration is the chance for the housing sector to engage with, and influence, the scope and shape of services at the local level, *and* for the key role of the sector to be

recognised by health and social care partners. Such recognition should include funding appropriate community-based services, including those which support older people to remain independent in their homes, and which enable people to return from hospital knowing that their home environment is suitable for them.

The inclusion of Housing Contribution Statements in Health and Social Care Partnerships' Strategic Plans on integration is an essential factor in ensuring a prominent profile for the housing sector, but whilst this is obviously welcome, we would argue that these statements need to be meaningful in their reach and intent, and not just pay 'lip-service' to the role of housing.

Additionally, it is critical that there is a read-across in the pivotal role of housing in relation to other key national and local authority policy areas: robust Housing Contribution Statements provide a vehicle for facilitating this holistic approach.

11 Rent affordability

The consultation asks for views on affordability. This remains a crucial issue for our member associations and for the people in our communities.

We would first comment on the ongoing importance of a cross-tenure perspective being taken on affordability, taking in the related but also quite separate issues of affordability in the social rented sector, private rented sector and in owner occupation. All too often the debate focuses too narrowly on social housing, where the most affordable housing costs are (we comment further on this below).

We recognise that addressing rent affordability in the private rented sector, and also house price inflation in the owner occupied sector, will remain particularly challenging in the absence of greater powers over both the social security and tax systems. GWSF is not qualified to comment on the merits or otherwise of different options for introducing rent controls in the private rented sector, but we know that in its current shape, that sector remains inaccessible to many people in housing need and on low incomes. One consequence is the general unsuitability of the PRS for housing homeless households, which puts extreme pressure on social housing providers in many areas.

In the social sector, keeping rents affordable remains a major priority for our member associations. It is also a significant challenge in the face of mounting pressures, including rising arrears as a result of austerity and the rollout of Universal Credit, and the decline of public services which puts an ever-increasing onus on social landlords to plug the gaps.

The Scottish Government and Scottish Housing Regulator often talk about affordability but do not comment on existing affordability measures or other specific ways of assessing affordability (excepting the important benchmark rent figures used in the affordable housing supply programme).

The sector does not operate in a vacuum here. The majority of associations in Scotland have always used whatever measure is in use at the time through SFHA (and, currently, jointly through SFHA and HouseMark Scotland). If the Scottish Government wishes to more proactively explore the detail of social sector affordability further, GWSF is more than happy to participate in these discussions. Our caveat would be that exploration of this should be proportionate to the relative scale of affordability challenges across the whole rented sector.

12 Accessing social housing

The consultation seeks views on access to social housing and how it can be improved.

Maintaining overall supply

Our first comment, and an obvious one, is that access to social housing becomes easier when more of it is being provided. Any reduction in the future new supply programme will just make accessing social housing even more challenging than it is now. This is especially the case given the inevitability that in areas such as Glasgow, improvements as part of the implementation of Rapid Rehousing Transition Plans will lead to a much greater proportion of overall housing association lets going to homeless households.

Because of this it will be particularly important to monitor how people are accessing social housing, to ensure as far as possible that access through the homelessness route is proportionate to access through other routes. If it transpires that the legislation is effectively preventing proportionate access, this needs to be openly discussed and not brushed under the carpet.

Addressing property mismatch

There will always be challenges thrown up by the fact that the size, type and location of available properties do not match the prevailing need and demand. This has been exacerbated in two particular ways in recent years. Firstly, the bedroom tax, along with the desire to keep rents affordable to smaller households, has made it less common for single or couple households to be offered a two-bedroom property. With this size being the most common within the housing association stock in Scotland, and the relative lack of one-bedroom homes, this brings real challenges, not least in offering suitable housing to homeless applicants.

Secondly, the need for larger family housing has become much more marked in some areas. Whilst the needs of refugee households are not the only factor here, the steep rise in the proportion of larger homes needed for refugee households has put even more pressure on social landlords in areas such as Glasgow.

A willingness – on the part of both central and local government – to fund a bigger proportion of larger new build homes is one part of the answer, but we believe there is greater scope for making better use of existing social housing stock by offering incentives to people to downsize. GWSF members in Glasgow are looking forward to participating in the forthcoming initiative, led by Glasgow City Council, to offer both a financial incentive and practical assistance with moving, to older tenants and others who are under occupying four bedroom or larger homes. Ultimately only a small proportion of such tenants are likely to move, but any increase in the capacity to relet such property will be a positive and very cost-effective step.

More broadly, GWSF believes that to further make the best use of our existing stock, serious consideration should be given to bringing back a modernised Tenants Incentive Scheme (TIS), which originally offered tenants a cash sum (£10,000 at the time) to help them buy privately and release their social rented home. This time round, we would see such a scheme being at the landlord's discretion rather than a right for all tenants, as it would be dependent on there being sufficient demand for the type, size and location of the property in question: there would be no point in someone vacating a home which may then be difficult to relet.

This would not be an unreasonable promotion of home ownership and, we believe, would be a better use of public funds than the current Help to Buy scheme, which appears largely to benefit those who could already have afforded to buy and does not normally release a social rented home. A revamped TIS would represent a relatively inexpensive way of boosting social sector relets.

How disabled people access social housing

One of the more complex issues facing the social housing sector is the ongoing difficulty facing disabled people seeking to access a more suitable home. It is complex because despite periodic national reports on the shortage of appropriate housing for disabled people, many social landlords say reletting adapting housing and even, in some cases, letting new, specially designed homes, is not straightforward.

We believe that one of the factors at play here is the need for a home to be suitable for a particular individual household, as needs among disabled people are inevitably quite specific and personal. Easier, quicker and more flexible access to funding for adaptations is one (relatively inexpensive) solution, but we also feel we need to better understand why the national shortfall in suitable homes does not lead to it always being easy to let adapted property.

Housing for older people

Increasingly, as tenure patterns change, the majority of older people will be less likely to be looking to the social rented sector for their housing needs to be addressed. Nonetheless a significant minority of older people will always be looking

to the social sector, and it will be important for appropriate provision to be made, both through new build and, where appropriate, re-provisioning of existing stock.

Even when sheltered housing provision was at its height, the vast majority of older tenants in the social sector were living in mainstream housing, and this will continue to be the case. The traditional specialist providers have largely been moving away from such provision and are instead focusing on provision of housing which is accessible, easy to manage and conveniently located – little different from what most people of any age would want.

There should not be unnecessary barriers to making such provision and, where it accords with the local authority's Local Housing Strategy, making some of it available exclusively for older people. There remains some uncertainty over the legal validity of such provision, which does not have the same extent of specialist design features that sheltered housing generally has had, and GWSF would like to see this lack of clarity addressed.

13 Next steps

GWSF looks forward to engaging proactively with Ministers, officials, our partner housing bodies, and of course our members, as the Housing to 2040 process progresses during this year.

It is important that there is adequate opportunity for the sector to be consulted on the Scottish Government's proposals, as none of the consultative processes so far have included any specific measures intending to be taken.