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12 July 2024

Dear Arianne,

Thank you for your letter of 4 June, following on from my appearance before the Committee in April on Housing to 2040 and building safety, where I agreed to revert to the Committee with further information on a number of areas.

You also note in that letter – and your subsequent letter of 28 June – that the Scottish Government has declared a housing emergency and that you would welcome further detail on how we plan to respond to that, including additional information on the justification for declaring such an emergency in the first place.

To help the Committee consider its next steps in relation to scrutiny of the Housing to 2040 strategy, please find further detail on each of the areas I agreed to provide more information on contained within Annex A accompanying this letter.

On the housing emergency, while we have important strengths in housing in Scotland - with strong homelessness rights and delivering more than 128,000 affordable homes since 2007 - along with many other countries, we are seeing growing pressures in the housing system. In recent years we have stepped up our own efforts and continued to work with our partners to act to tackle rising homelessness and supply chain, workforce and inflationary pressures on new supply, but pressures have continued to build.

Therefore, in recognition of the now exceptional pressures on supply; the Scottish Housing Regulator's reports of rates of systemic failure in homelessness services; and a number of local authorities declaring emergencies due to a variety of local pressures - we declared a national housing emergency in May.

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Following on from this, I made a [statement to Parliament](#) on 20 June, setting out the Scottish Government's initial response to tackling the housing emergency. The plan sets out a range of action to respond to the emergency organised under three strategic pillars:

1. More high quality, permanent homes
2. The right homes in the right places
3. A permanent home for everyone

My statement made clear we continue to take action to address levels of homelessness and improve the supply of social and affordable housing - but truly tackling the housing emergency will rely on a joint approach between UK, Scottish and local government.

It is important to make clear that Housing to 2040 remains our key overarching strategy that sets out a vision and roadmap to ensuring everyone has a safe, good quality and affordable home by 2040. That has not changed and, alongside the Housing to 2040 Strategic Board and partners across the housing sector, we intend to review actions and priorities in the short-term to respond to the housing emergency and I am of course happy to keep the Committee updated as this works progresses.

I trust you find this update, and the further information provided in Annex A, helpful and I look forward to hearing from you in due course regarding the next steps in the Committee's scrutiny of the Housing to 2040 strategy.

Yours sincerely

PAUL MCLENNAN

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Further information on the Housing to 2040 strategy

The review of the affordable homes target brought forward from 2026-27 to this year.

The review of the Affordable Housing Supply Programme (AHSP) has been brought forward from 2026-27 and will be reporting to Ministers this summer. The Review is considering the responsiveness, impact, efficiency and cost-effectiveness of the AHSP. The affordable housing target itself is not being reviewed and remains unchanged. I would welcome the opportunity to come back to the Committee to discuss the review once I have received and considered its findings.

Indicators for the National Performance Framework.

We have a statutory duty to regularly report on progress towards our National Outcomes, which we do through the National Indicator Set. Although review of the National Indicators does not fall within the scope of our statutory duty to review the National Outcomes, we want to ensure the indicator set remains fit for purpose and focussed on measuring progress towards the updated National Outcomes. Therefore, indicator development is required to ensure the indicator set best reflects the new National Outcomes.

Currently we have 81 indicators in the National Performance Framework (NPF) across 11 National Outcomes, of which 6 indicators are still in development (as at May 2024). The indicator set is not designed to provide a comprehensive view of all available evidence but to give an indication of progress through some key headline measures, and the indicator set is being reviewed with this in mind. The NPF does not have time-specific commitments, because it is about continuous improvement.

We are assessing the relevance, need and quality of all current 81 National Indicators as well as exploring alternative measures that would better reflect the refreshed National Outcomes. The indicators will need to meet a minimum data quality level to be included in the updated indicator set, including a minimum frequency of publication to effectively track progress over time.

Better use and reporting of cross-cutting indicators to evidence multiple outcomes and show the links between outcomes is also being explored. Alignment of other monitoring frameworks and reporting mechanisms to the revised indicators and NPF links to the Sustainable Development Goals (SDGs) will be reviewed as part of indicator development. How we report on these interlinkages will be considered after the refreshed National Outcomes and National Indicators go live.

We are also considering further data improvements from the feedback received through the NPF Outcomes review consultation as part of the indicator development process. The ability to disaggregate data and report progress across geographies and groups (such as equality characteristics) is an important criterion in the development of the refreshed indicator set. How we can better disaggregate current indicators will be considered as part of this.

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We are at the end of the drafting and engagement phases of NPF indicator development and moving into the approval phase so changes will only be made where a strong need is evidenced. We will have a refreshed set of National Indicators ready to launch alongside the refreshed National Outcomes.

Whilst we are aiming for all the indicators included in the next iteration of the NPF to be able to report data from the beginning, in some instances where the first data collection is in progress then we may not be able to publish data immediately.

Housing to 2040 contains a commitment to a single set of standards for housing quality and accessibility, and a consultation will be issued shortly.

Plans on this remain the same as when I wrote to you on 23 January this year. The intention is to publish a consultation on a new tenure-neutral housing standard in 2025. We will then examine the responses to this consultation and further develop our policy proposals. I look forward to continuing to work with the committee and our stakeholders as we take forward this crucial area of work.

Confirmation of the membership and remit of the Housing Investment Taskforce.

The remit and membership of the Housing Investment Taskforce is published on the Scottish Government website (see [Housing Investment Taskforce - gov.scot \(www.gov.scot\)](https://www.gov.scot/resources/consultations-petitions/html/2024/2024-00010)).

Work with ALACHO and COSLA on empty homes, voids and allocations in responding to homelessness.

The Scottish Government wants to increase housing options for people to move to a permanent home by minimising the number of empty social homes. In 2023-24, we provided £2 million to the local authorities with the greatest temporary accommodation pressures to support effective housing stock management. This included flipping temporary accommodation to permanent tenancies, more effective management of void properties, increasing allocations of social homes to homeless households and bringing empty homes back into use. We are now seeking feedback from local authorities on the impact this funding has had.

Voids

The Scottish Government recognises that stock management issues do not impact all local authorities universally and that there can be a range of reasons that properties are void, which is why these decisions are a matter for local authorities. However, in my engagement with Housing Convenors, I have heard that issues with utility companies and workforce challenges are the main issues contributing to longer void turnaround times. For that reason, we intend to send a joint letter with COSLA to individual energy suppliers on the impacts delays in reconnecting utilities is having on void turnaround times, to be followed by official level engagement with energy suppliers over the summer, and we will support the work of local authorities and registered social landlords to better understand what they need to do to reduce turnaround times for empty homes and voids. The declaration of a housing emergency asks all partners to play their part, therefore, I would hope that relevant organisations in the energy sector heed this call to action and respond quickly and satisfactorily to the concerns local authorities have raised.

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Allocations

Likewise, allocation policies are set by individual local authorities in response to the circumstances and housing needs in their areas. Since 2020-21, we have seen percentage lets to homeless households by local authorities remain fairly static (50% in 2020-21 vs 49% in 2022-23).

However, there has been a reduction in percentage lets to homeless households by registered social landlords (RSLs) over the same period (38% vs 35%), which has reduced the average lets across all social landlords (44% to 41%). Following the declaration of a housing emergency, we will invite local authorities and associations to revisit their allocations policies and check that they remain fit for purpose.

Empty homes

Bringing empty homes back into use is one of the most cost-effective ways of increasing housing stock, however, we know the reasons why homes become, and stay, empty are complex. The [independent audit](#) undertaken by the Scottish Government in 2023 showed that having dedicated empty homes officers in each local authority to work with owners to bring homes back into use is the most cost effective intervention. I want to see every local authority recognise the benefits of this successful approach and to work with the Scottish Empty Homes Partnership to consider all options to return more homes to active use. This approach is enhanced by a range of other actions, including a new grace period from the council tax premium to help incentivise the purchase of homes empty for longer than 12 months and further consideration given to compulsory purchase reform.

Further information on the work Professor Ken Gibb is undertaking on the definition of affordability.

The Scottish Government has committed to developing a shared understanding of housing affordability for Scotland and in 2022 convened a working group of stakeholders and experts from across the housing sector, to assist with this task. The group is chaired by Professor Ken Gibb, Professor of Housing Economics at the University of Glasgow.

Professor Gibb is in the process of finalising the group's report and recommendations to Ministers, which will be shared with the Scottish Government this summer.

On retrofitting, an update on timescales for the report by the Green Heat Finance Taskforce

The Green Heat Finance Taskforce (GHFT) [Part 1 Report](#), published in November 2023, focused on how to increase the range of private finance products for individual property owners, identifying opportunities to develop new products at scale. The GHFT Part 2 report will be published later this year and will focus on financing mechanisms that might apply across multiple properties through communal and area-based mechanisms.

A formal Scottish Government response setting out which recommendations (from both Taskforce reports) it will take forward, how and with whom, will follow shortly after the publication of the Taskforce's Part 2 report.

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Further information on Building Safety

Further reflections on the idea of a buildings database and building MOTs.

The Scottish Government have carried out initial research into how the existing building standards statutory registers that provide information on buildings which have been subject to the building warrant process could be more accessible as public data.

However, Building Standards Registers only provide information on buildings which have been subject to the building warrant process (new buildings, alterations and extensions for example) and by legislation have a retention period of 25 years with some exceptions. In order for any wider database that captures information related to all buildings to be useful, it would need to be maintained, which would be a significant undertaking. This requires further consideration in terms of resources at local and national level.

As I set out when I wrote to you on 23 January, we recognise that any future work on cross-tenure housing standards would benefit from considering the recommendations from the Tenement Maintenance Working Group made in 2019 for 5-yearly building inspection reports. In taking forward this work, we can consider how to improve the information we have on the condition of our buildings in this important area of the built environment.

Update on the Scottish Law Commission's work on building maintenance.

The Scottish Law Commission published its Discussion Paper consulting on reform of tenement law in terms of compulsory owners' association on 25 April 2024. The closing date for comments is 1 August 2024, after which the Commission will consider the responses received.

The Commission intends to report to the Scottish Government with their findings from this work, and their recommendations for legislation, by Spring 2026.

Further information on guidance on damp and mould.

We are aware of concerns that poorly designed solutions to improve the energy efficiency of homes could impact negatively on condensation, damp and mould.

We will be working with the sector to ensure that this is considered as we develop energy efficiency standards. We will also be considering what is appropriate in terms of tackling the serious issue of damp and mould as we continue to develop cross-tenure housing standards.

The recent consultation on Delivering Net Zero for Scotland's Buildings included a proposal for a heating and energy efficiency technical suitability assessment. This would aim to provide building owners with more detailed information about the suitability of their building for different heating systems and energy efficiency measures. The proposals in the Social Housing Net Zero Standard consultation were co-developed as part of the review of ESSH2, and are consistent with plans for the wider housing stock. The consultation sought views on a standard that will require social landlords to improve fabric efficiency, and install clean heating, across their stock, where it is technically feasible and cost-effective to do so.

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Where energy efficiency improvements increase the air tightness of a building, monitoring air quality can have an important role in preventing unintended consequences. Where such a risk exists, landlords should also consider the need for Mechanical Ventilation with Heat Recovery. Within the consultation, it was proposed that landlords should be required to devise a ventilation and monitoring strategy to accompany energy efficiency interventions in cases where mechanical ventilation isn't installed.

Following the independent analysis of responses, the Review Group will be asked to consider the final design of the proposed Social Housing Net Zero Standard, ahead of the Scottish Government publishing its final response.

In relation to RAAC, outcomes of options appraisals being undertaken by Aberdeen and Clackmannanshire Councils.

In relation to RAAC, the options appraisal process is still ongoing for both Aberdeen City and Clackmannanshire Councils. We are continuing our engagement with both local authorities as they progress through this process.

I will continue to update the committee when we understand more about the options available, and the likely costs involved.

In terms of interlinked fire alarms, figures for their instalment as drawn from the Scottish Household Survey.

The Scottish Government provided a total of £2.1 million between Care and Repair (£1.1 million) and Scottish Fire and Rescue Service (£1 million) during 2021/22 to support those in greatest need or at greatest risk of fire, to meet the new standard. An announcement was made on 22 January 2022 about the original funding for Care and Repair being doubled to just over £1.1 million to meet demand. All the money has been allocated and spent.

In 2022 the Scottish House Condition Survey asked the following new question on fire alarms: Has the dwelling satisfactory equipment for detecting fire and giving warning in the event of fire or suspected fire? Responses were recorded as a yes or no answer, and in order to be recorded as 'yes' a dwelling must have interlinked fire alarms installed meeting a number of criteria. In 2022 around 638,000 (25%) dwellings were recorded as not having satisfactory equipment for detecting and warning in the event of fire (not necessarily due to alarms not being interlinked).

While all dwellings meeting the fire alarm criteria have interlinked fire alarms, there may be some dwellings recorded as having insufficient fire detection equipment that do have interlinked fire alarms but failed the fire alarm criteria due to other factors such as insufficient number of alarms, improperly powered alarms, or improper locations of alarms. However, due to the yes / no mode of question this number cannot be quantified from 2022 SHCS data.

From 2023 the SHCS question on fire alarms will provide details as to why a dwelling's equipment for detecting a fire is unsatisfactory which will allow analysis in this area from 2025.

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Concerns about the quality of the data informing the Scottish House Condition Survey.

We have confidence that the information on housing conditions, and specifically on damp and mould, from the Scottish House Condition Survey gives us a robust and clear picture. In 2009, the SHCS was designated as a National Statistics product by the UK Statistics Authority (UKSA) and in October 2020, following a compliance check by the Office for Statistics Regulation (OSR), it was confirmed that these statistics should continue to be designated as National Statistics. This demonstrates that the SHCS statistics are accurate, trustworthy, and compliant to the high standards required of National Statistics.

The SHCS consists of an interview with householders and a physical inspection of the dwelling they occupy, which provides a picture of Scotland's occupied housing stock. It covers all types of households and dwellings across the country - whether owned or rented, flats or houses. The physical data about the dwelling is recorded by surveyors trained to collect detailed information on housing characteristics, condition and state of disrepair, compliance with housing quality standards, energy efficiency and other details. Surveyors are required to be fully professionally qualified and they are recruited from a variety of different dwelling-related professions such as: chartered surveyors, architects, civil and structural engineers, environmental health officers and building control officers. New recruits attend a five-day residential training course, including fieldwork practice, so that they are fully proficient with the methodology used in the SHCS.

Questions H10 – H13 in the survey record the extent of rising damp, penetrating damp, condensation, and mould present within each room, and also for the whole dwelling, on an 8 point scale. These measurements are based on evidence present at the time of the inspections such as lifting floor tiles, or discolouration of walls. As mould may occur intermittently or be cleaned prior to the survey appointment, surveyors are prompted to ask the occupant about any mould growth to ensure accurate results.

These measurements then feed into the surveyors assessment of the tolerable standard in question T2. Dwellings showing persistent visible rising damp are recorded as failing due to rising damp while dwellings with penetrating damp that covers: 10% of the overall wall space in one apartment (habitable room) in the dwelling; or 10% of the ceiling in one apartment (habitable room) in the dwelling; or 20% of overall wall space or ceiling in one or more other spaces in the dwelling are recorded as failing due to penetrating damp. For a full description of how surveyors record and assess damp, mould, and condensation as well as a comprehensive list of characteristics surveyors look for as evidence of damp mould or condensation see section H (from page 78) and section T2 (pages 279 – 282) of the [SHCS Surveyor Manual](#).

As part of the SHCS, we record and analyse levels of damp, mould, and condensation present in our housing stock. For the 2022 survey, levels of mould, damp and condensation were similar to those seen in 2019: 90% of properties were free from any damp or condensation and 91% were free from mould. Levels of damp mould and condensation can vary depending on dwelling and household characteristics. For example in 2022 3% of owner occupied dwellings were recorded as having any damp, compared to 4% in the social sector. Similarly in 2022 tenements (10%) were more likely to have condensation than detached properties (6%).

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