

East Renfrewshire Council Response to Scottish Parliament’s Local Government, Housing & Planning Committee January 2025 Letter

How you have defined the housing emergency:

Since 2019, East Renfrewshire Council has seen a significant increase in homeless applications. This has had an impact on both the demand for services and how services are being delivered.

The Scottish Housing Regulator (SHR) have stated that several Councils are facing “systemic failure” of their homelessness services. East Renfrewshire Council is in this group of Local Authorities. As a result the Council meets on a quarterly basis with the SHR to provide an update on what actions the Council has taken to address this risk.

The main driver of this decision by the SHR is the use of hotel accommodation which is deemed unsuitable accommodation. The Homeless Persons (Unsuitable Accommodation Order) (Scotland) 2014 states that homeless households should not be placed in temporary accommodation that is 'unsuitable' for more than 7 days. “Suitable” temporary accommodation pursuant to section 5 of The Homeless Persons (Unsuitable Accommodation Order) (Scotland) Order 2014 (as amended) is required to be not **“outwith the area of the local authority which is subject to the duty to accommodate”**. In recent years, East Renfrewshire Council has increased its use of hotel accommodation, much of which has been external to our local authority area and consequently has been and continues to be in regular breach of this order.

Whilst East Renfrewshire Council is not alone in this crisis, the local housing market makes it challenging to respond to this increased and sustained demand. As detailed in the table below, East Renfrewshire has very high owner occupation levels and the smallest percentage of social housing in mainland Scotland. In addition, the high costs to purchase or rent privately in East Renfrewshire means that accessing housing in the private sector is out of reach for many local residents.

Tenure	East Renfrewshire	Scotland
Owner Occupied	82.0%	59.2%
Private Rented	6.6%	14.2%
Registered Social Landlord (RSL)	3.8%	10.8%
Council	7.6%	12.1%

The turnover of Council housing has also reduced over the past 5 years from 260 to around 190 homes per year. However, from 2017 East Renfrewshire Council has had a target to deliver on average 45 new affordable homes through the provision of new council housing and in partnership with local social housing providers. In the previous 6 years, 413 new homes have been provided against a cumulative target of 270 homes. This delivery continues with the accelerated delivery of a further 105 homes in 2024/25.

Even setting aside these stock issues, East Renfrewshire Council is now receiving between 400-450 homeless applications each year and have duty to house approximately 70% of them. Historically East Renfrewshire Council received between 300-350 homeless applications each year, this change in demand is a significant challenge.

Furthermore, in 2023/24 the Council had only 116 of the available properties that could be used to meet the needs of homeless households. The remaining properties were either sheltered housing or used for temporary or supported housing. Consequently, our total available lets therefore equates to less than 50% of the households with whom we have accepted a duty to house, before even factoring in the needs of others in housing needs, for example overcrowding or health needs as just two examples.

The table below compares homeless presentations and the number of households in temporary accommodation for East Renfrewshire Council and across Scotland between 2019 to 2023. These levels initially increased during the COVID 19 pandemic and have not returned to normal levels. The table below influenced the decision to declare a housing emergency as it showed that whilst homelessness has increased across the country, it has disproportionately increased within East Renfrewshire. Full details can be found, <https://www.gov.scot/collections/homelessness-statistics>.

	No New Applications		No in Temporary Accommodation	
	ERC	Scotland	ERC	Scotland
Sept 2018 – 2019	315	36,375	60	11,432
Sept 2022 - 2023	481	40,024	135	15,625
% Increase	53%	10%	125%	37%

New national data published for the period September 2023 to September 2024 has shown a decrease in applications at 442. However the numbers in temporary accommodation in East Renfrewshire at the end of September 2024 increased by 44% from the same period the year before, compared to a national average of 6%. It is also worth noting that East Renfrewshire live homeless cases at the end of September 2024 increased by 38% compared to a national average of 6%.

The data demonstrates that the local housing market cannot respond to even small changes in homelessness as there is not a suitable supply of permanent accommodation. Owner occupation and the private rented sector is out of reach of many of our residents who are in housing need, on cost grounds. Social housing is proportionately much less available in terms of total stock numbers when compared against most of the rest of Scotland, and this general lack of availability is underlined by an exceptionally low level of turnover and availability when compared to the rest of Scotland.

Underlining the above point, in terms of permanent rented stock, the Council has circa 3,200 units and the main partner Barrhead Housing Association circa 1,000. With turnover little more than 5% per year typically, which is very low in comparison to most other areas, our ability to move people on from temporary to permanent stock is limited in perhaps the way that it is less so for others.

At present the Council has up to 370 households accepted as homeless and awaiting an offer of accommodation.

In addition to the core homeless duties, the supply of affordable housing stock in the area also must support and meet other key duties including:

- Corporate Parenting Duties both domestic and Unaccompanied Asylum Seeking Children (UASC) via the National Transfer Scheme.
- UK & Scottish Government policy decisions in relation to the provision of support and accommodation to people displaced by conflict.

It is also worth noting the impact of the removal of the local connection test from November 2022 has increased pressure on services. East Renfrewshire is viewed as an attractive place to live but the local housing market cannot meet the demand for social housing for local residents and is under significant pressure from households presenting from outwith East Renfrewshire. At present East Renfrewshire Council is receiving approximately 20% of applications from outwith the area, this includes those granted leave to remain from either Glasgow or south of the border.

In addition we have seen instances of “homeless tourism” whereby applicants are making multiple applications to different authorities. This is often because many authorities are unable to provide temporary accommodation. This is an unintended consequence of the removal of local connection.

Therefore in response to the first question posed by the committee; the Council cannot house all of those to whom we have a duty from available stock turnover. Current new build rates for affordable and/or social rented housing will not make a substantial difference to these challenges though it will help offset them to a limited degree.

An update on the action taken in East Renfrewshire to tackle the emergency and what progress has been made:

East Renfrewshire has put in place several actions in recent years to respond and mitigate the impact of this issue, this includes:

- More than doubling the provision of temporary accommodation from around 60 units in 2019/20 to over 145 units currently in use.
- Increasing the % of lets to homeless households to 70% for existing stock and 40% for new build accommodation. However, it should be noted that whilst these targets are met for new build accommodation, the % of lets to homeless households for existing stock averages around 50-60% as supply does not meet demand in terms of household size and area preferences.
- Reviewed existing agreements with local RSLs.
- Reviewing internal process to focus on a prevention approach. This includes:
 - Good housing advice services delivered by a dedicated team but training also extended to Neighbourhood Housing Officers.
 - The development on self-serve online advice services.
 - Review and development of a protocol to ensure Care Experienced Young People are not assessed as homeless.
 - Tenant Support Fund focused on rent arrears.
 - Establishment of multi-partnership strategic group to review services for homeless households. The purpose of this group is to review the homeless service from start to finish. This includes ensuring that partners work together to prevent homelessness from occurring, where possible. In addition to ensure households receive the correct advice and service from all agencies involved.

In order to address the shortage of temporary accommodation and reduce the ongoing breach of the Homeless Persons (Unsuitable Accommodation Order) (Scotland) 2014 the Council is:

- Extending Overlee House. This is a temporary accommodation site in East Renfrewshire that has 10 properties and support officers on site at an estimated cost of £927k. Completion of an additional 5 units (including 2 adapted properties) is expected early 2026.
- Approved £1m to purchase stock from the open market to increase the stock of temporary accommodation. The Council have purchased (or are finalising the purchase) of 5 properties with the aim to purchase 2 more in scope.
- A report to Cabinet on 6th Feb approved an additional £1m investment to continue this programme in 2025/26.
- The Council is estimated to spend £2.4m on hotel accommodation to ensure the legal duty to provide temporary accommodation can be met.
- Partnership approaches – regular discussions with local Housing Associations, Private Landlords and Developers.

The Council will undertake a land audit to consider whether a modular site can be developed and a review of buildings owned by the Council to determine if they may be suitable for conversion into temporary accommodation.

The Council are also taking a number of actions to maximise the provision of new housing and ensure it is delivered to those most in need, this includes:

- Review of the local Letting Policy to ensure that it is meeting the greatest needs. This included seeking urgent cabinet approval to change the lettings targets. The change allocated more new homes to existing council tenants. This approach created a secondary let from the homes that the tenants vacated. These secondary lets were used to re-house homeless households and others on the waiting list in housing need.
- A fully revised Letting Policy will be presented for approval later in 2025.

Through the development of the Strategic Housing Investment Programme (SHIP), East Renfrewshire Council and our partner social landlords continue to increase the supply of affordable housing. However it is important that the committee are aware of the following issues:

- Financial capacity of social landlords – in the development of capital programmes, the Council (and all other social landlords) have a legal duty to ensure existing homes meet all current and future statutory standards. The introduction of the Social Housing Net Zero Standard (SHNZS) is expected to place significant investment pressures in the coming years.
- Affordable Housing Supply Programme (AHSP) – the existing Strategic Housing Investment Plan (SHIP) 2025-30, which was agreed on 24 October 2024, is based on the 24% AHSP reduction. Whilst the Council welcomes the decision to return funding to previous levels, the committee must also be aware that the increasing cost to build is a challenge for landlords.

Land Supply and Infrastructure – whilst new homes are needed, a challenge remains to identify available land and the infrastructure to meet this need. In East Renfrewshire school capacity represents a significant challenge.

Measures taken to reduce the number of voids or empty properties

East Renfrewshire Council employed an empty homes officer in July 2024 to target the 124 of long-term empty homes in East Renfrewshire and return them to the housing market. Engagement with empty and second home owners in conjunction with the council tax levy being applied has resulted in a 12% reduction in the number of empty homes and a 7% reduction in the number of second homes.

The Council is also undertaking a full review of voids processes to minimise any avoidable delays. At present the Council has no unlettable stock. As with all local authorities, East Renfrewshire Council face void delays to reset debt or damage to utility meters. The Council works with a void energy management service to improve to turn around of voids. However, where the issue requires an engineer to attend from a utility supplier, significant delays can occur.

The Council welcomes the Scottish Government's work to engage with national energy suppliers to develop an approach to ensure complex utility supply issues do not continue to be an issue in re-letting void properties.

Reduction of people and children living in temp accommodation

As at the end of September 2024, East Renfrewshire Council has 194 households in temporary accommodation (66 in hotels). As the end of December 2024, this has reduced slightly to 182 households in temporary accommodation (57 in hotels)

With regards to children and pregnant women, whilst they can at times be placed in hotel accommodation, they are prioritised to be placed in suitable accommodation above all other households. At the end of September 58 households (119 dependants) were in suitable temporary accommodation, again this reduced slightly at the end of December 2024 to 55 households (102 dependants) in suitable temporary accommodation.

Whilst the supply of new housing is needed and will assist in addressing the crisis, this will help mitigate the crisis but not resolve it. In addition, despite the actions already taken East Renfrewshire Council, as noted by the Scottish Housing Regulator, still remains at risk of “systematic failure”.

Appendix – Letter Received from the Scottish Parliament’s Local Government, Housing & Planning Committee



The Scottish Parliament
Pàrlamaid na h-Alba

Local Government, Housing and Planning Committee

Steven Quinn
Chief Executive
East Renfrewshire Council

20 January 2024

Dear Steven

Inquiry into Housing

The Local Government, Housing and Planning Committee has been carrying out an [inquiry into Housing](#), which has explored the response to the ongoing housing emergency at both national and local levels.

To support the Committee’s understanding of the current position, I am writing to each of the local authorities which have declared a housing emergency for an update on the current position. The Committee will publish a report into its inquiry and will draw on the information provided.

I would therefore be grateful if you could provide the following:

- How you have defined the housing emergency.
- An update on the action taken in your area to tackle the emergency and what progress has been made.
- The Committee is particularly interested in whether measures have been taken, where relevant to your authority, to reduce the number of property voids or empty homes, or to increase the acquisition of properties.
- Whether you are experiencing a reduction in the numbers of people and children living in temporary accommodation, or who are homeless, as a result of those actions.
- Details of how you measure progress towards tackling the emergency, including indicators and how these are monitored.

I would be grateful for a response by Friday 14th February.

Yours sincerely,

Ariane Burgess
Convener, Local Government, Housing and Planning Committee