

Local Government and Communities Committee

Housing (Amendment) (Scotland) Bill

Submission from the Association of Local Authority Chief Housing Officers (ALACHO)

1. Introduction

1.1 As the representative body for Scotland's Local Authority Chief Housing Officers ALACHO welcomes the opportunity to respond to the Local Government and Communities Committee's call for evidence in relation the Housing (Amendment) (Scotland) Bill.

1.2 Whilst the bill deals largely with issues relating to the regulation of Housing Associations local councils have an interest in the measure arising from:

- our role as strategic housing authorities with an interest in the functioning of the local housing market and planning to meet housing needs and demands;
- our role in managing and directing investment in new affordable homes and the capacity of the RSL sector to meet the need and demand for new homes;

1.3 In preparing our response to the specific questions the committee has asked we have kept in mind both the key strategic issues and the long-term interests of current tenants. We deal with each of the questions in turn in the rest of this submission.

2. Do you agree that measures should be taken to influence the ONS to reclassify RSLs as private sector bodies; and if not, please explain why?

2.1 Yes, ALACHO agrees that the Scottish Government should take steps to ensure that RSLs are reclassified as private bodies. Without such a move RSL net borrowing will form part of overall Scottish Government borrowing. As well as impacting on other Scottish Government investment programmes such a change is also likely to limit the capacity of the RSL sector to invest in new social rented homes and to meet the Energy Efficiency Standard for Social Housing.

3. Do you have any views on the appropriateness of the measures proposed in this Bill to bring about this reclassification

3.1 We have had a number of discussions with Civil Servants about the options, the risk and the likely impact of not reversing the decision by the ONS and we are content that the measures in the bill are appropriate.

4. Do you have views on whether the aims of the Bill could be achieved by other means?

4.1 We are aware that the Director of National Accounts and Economic Statistics has indicated that a legislative solution is required to achieve the reclassification of RSLs in Scotland and that the proposals set out in the Bill are broadly consistent with those being put in place for England and Wales. We are not aware of any other specific options that could have been adopted.

5. Any other issues relating to the Bill which you wish to bring to the attention of the Committee?

5.1 Our main concern during discussion with the Scottish Government was to ensure that the regulatory framework for RSLs and Council landlords remain, so far as is possible, consistent. The proposals in the Bill appear to have achieved this. We are also fully aware of the concerns that have given rise to the limits on Local Authority influence over RSLs proposed in the Bill. We are not aware of any arrangements currently in place that would be impacted by these measures.

Tony Cain
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Association of Local Authority Chief Housing Officers