



Draft Rented Sector Strategy Consultation

Quakers in Scotland

The Religious Society of Friends (Quakers) is a faith group committed to promoting peace, equality, truth, simplicity and sustainability within Scotland's society. Through Quaker Housing Trust, Quakers have worked with grassroots housing organisations across Scotland to help them to provide decent homes for people in often desperate need of housing. This includes housing projects in Glasgow, Mull, Arisaig, Glenurquhart, South Ayrshire, and Staffin. We welcome the chance to respond to the Scottish Government's consultation on its draft rented sector strategy. Housing and housing policy do not exist in a vacuum. They are part of the whole social and economic life of the nation: housing is one of the few areas that affects everyone all the time. Quakers believe that a secure home with adequate space and amenities is an essential foundation for individuals and households to grow. It is a vital part of making true community. This concern is firmly rooted in our spiritual values and our understanding that inequalities in housing are inextricably related to other inequalities: poverty, unemployment, health, education, prejudice and other causes of social marginalisation. Our concern for housing is, therefore, not 'just about' housing.

Key points:

The vision, Aims and strategic outcomes

- We warmly welcome the vision and strategic aims laid out in the draft strategy. Particularly the requirement for everyone to have access to a warm, safe, affordable and energy efficient home that meets their needs; the need for total housing costs to be kept proportionate to people's average incomes, [especially] those on low to modest incomes; the importance of tenants having a voice; and the role that the rented sector has in supporting community empowerment in Scotland.
- We welcome the Rights based approach laid out in the draft strategy and the stated desire to *"ensure that people don't just have theoretical rights but can practically realise those rights"*. This will require significant resource and engagement, some of which is reflected in the strategy.
- We believe that the draft strategy is a significant opportunity to respond positively and creatively to the Climate and Ecological Emergency and the cost of living crisis that we are currently facing. While acknowledging the scale of the task at hand we believe that the strategy could push for a more rapid pace of change given the urgency of these twin crises.

Tenants' rights

- We welcome moves to increase tenants' rights within Scotland. We particularly welcome the Strategy's focus on marginalised groups and look forward to more work being done in this area to fix the housing system, which currently disadvantages people with disabilities, women and people from ethnic minority backgrounds.
- We believe that having a Tenant Participation Panel is an important step in ensuring that tenant voices help shape housing policy in Scotland. We would encourage the Scottish government to work directly with marginalised groups to ensure that their voices are heard and views represented.
- The onus should not be solely on tenants to tackle poor and illegal practice. Regulatory powers need to be rigorous to help rebalance the tenant/landlord relationship.

- We welcome regulation that ensures high levels of quality, affordability and fairness within the sector. We would like to see these outcomes more clearly defined.
- We welcome the moves to introduce pre-action protocols on a permanent basis in the private rented sector. Within this we also welcome an obligation to ensure that domestic abuse risk has been fully considered before commencing legal action to recover possession of a property for rent arrears. We support keeping all grounds for eviction discretionary as this provides an important extra protection for tenants against eviction and the often-resulting homelessness.
- We support the intention behind the proposals to make restrictions on winter evictions permanent. We understand that the rationale is to ensure that no one is forced to leave their homes during the coldest months of the year. This is a pragmatic, understandable policy to protect tenants during a difficult time of year when, for example, high fuel bills make rents harder to meet. Nonetheless, the protection we are looking for is to ensure evicted tenants are not put into a position of homelessness, winter or summer, rain or shine. This is particularly important as Scotland's weather becomes more extreme and erratic as a result of climate change. Before any eviction there should be negotiation between tenant and landlord and, if the situation is moving towards eviction, the landlord and tenant should be required work through an independent 3rd party to ensure that the tenant has a home to go to if eviction is the outcome. Eviction must be made the last recourse.
- We believe that there should be no eviction by social landlords into homelessness. Housing charity Shelter Scotland state that as much as 43% of households evicted from social sector homes went on to be assessed as homeless.

Affordable rents

- We welcome moves to collect and publish data on rents in the private sector. This will increase understanding and support action to address affordability issues.
- We believe that increasing the stock of social homes is a significant lever in increasing affordability and delivering the right to adequate housing. Large numbers of people in poverty are trapped in the private rented sector due to a scarcity of social homes. Stepping up the supply of social homes would provide them with a viable alternative.
- The Living Rent campaign advocates for a points based system that links the maximum rent a landlord can charge to the quality of the property; this would encourage improvements. They also advocate for these rents to be limited to a specific Rent Affordability Index. We would strongly encourage the Scottish government to actively explore and trial this model.

Supply of rented homes

- We are pleased to see that the draft strategy is considering both Rights and supply as part of its rented sector strategy, as these will both have a significant bearing on affordability and quality.
- However, it is imperative that the Scottish Government recognise that increasing the supply of social housing in the right places should be a priority as this will provide alternatives to the private rented sector for those in need while also better enabling the government's ability to deliver the right to adequate housing.
- An increase in the volume of social housing would lessen Local Authority reliance on the private sector to provide homes for the vulnerable, and therefore lessen the impact of private sector rental increases due to market forces outside LA control. We think this could

help to make Local Authority finances more resilient in the longer term, reducing the drain of public finance into the private sector.

- An increase in the proportion of social housing in Scotland's housing mix would have the additional benefit of accelerating the achievement of reducing carbon emissions through steps outlined in the Heat in Buildings Strategy, since low-carbon requirements for social housing have the earliest target dates.

Short-term lets

- The introduction of local authority powers to control and manage short-term lets in April 2021 is welcome. However, to make a real impact in relation to the supply of private rented homes, these measures need to be enhanced. Property owners should be incentivised to offer long-term tenancies, and local authorities can assist this by a) making it more difficult to use their property for Airbnb-type short lets; and b) by measures such as ensuring good management of housing benefit, and supporting landlords through training and implementation of good practice.

Housing Standard

- We welcome plans for the creation of a housing standard for the private sector, although would like to see more detail about this as this will have a crucial bearing on Scotland's climate ambitions.
- The strategy calls for all private rentals achieving an Energy Performance Certificate of C by 2028 "*where technically feasible and cost effective*". We are unclear what percentage of Scotland's houses this would exempt, and are concerned that such a loophole could well undermine Scotland's attempts to achieve its climate targets.
- We are also concerned that the strategy outlines that the requirement to install zero, or very near zero emissions heating in existing buildings will not begin in on-gas areas until 2030, and that all buildings will not be required to meet this standard until 2045. While we recognise the scale of retrofitting required, we would question whether a period of 23 years from the present day is genuinely necessary for this transition.
- We would like to see a bold plan of refurbishment to improve the energy efficiency of houses, cut fuel bills and contribute to reducing Scotland's carbon footprint. We believe that the strategy should reflect the urgency of the Climate and Ecological crisis, and the cost of living crisis, and should be clear who will bear the direct costs and how these will be shared between landlords, tenants and the tax payer. The benefits of this transition must not be restricted to those who can afford to make the investment for themselves.
- The cost of such a refurbishment would require significant government investment. The Scottish government should consider ways in which it can creatively use the taxation powers at its disposal to support this.

Rural Issues

- There appears to be little 'rural-proofing' in the consultation document. The balance of housing supply in rural areas, particularly remote rural, is significantly different from urban settings; there tends to be more private ownership and rental, and less social housing.
- Community housing initiatives have a major part to play, particularly where small numbers of new properties make a significant difference to a community (eg in [Ulva Ferry](#) on Mull, a

project that was supported by Quaker Housing Trust). Housing associations face big barriers in such developments, and it is often up to local communities themselves to take the initiative. Support bodies such as Rural Housing Scotland and the community housing trusts in Highland and Dumfries & Galloway play an important role in educating and facilitating such work, and should be supported.