
Report To: Safe, Sustainable Communities Committee Date: 1 September 2009

**Report By: Corporate Director, Environment and
Community Protection**

**Report No: ECP/Plann/
VK09/024**

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Subject: Retaining Social Rented Housing through Pressured Area Status

1.0 PURPOSE

- 1.1 To inform the Committee of the implications of applying for and securing Pressured Area Status (PAS) for the settlements of Kilmacolm, Inverkip, Wemyss Bay and Gourock.

2.0 SUMMARY

- 2.1 PAS is a mechanism which can be used by local authorities to retain social rented stock in areas of high housing need where 'Right-to-Buy' (RTB) sales are likely to further reduce limited levels of stock. The mechanism was introduced in the Housing (Scotland) Act 2001 and stipulates PAS can suspend Scottish Secure Tenancies (SST) with 'modernised' RTB terms for a period of up to five years.
- 2.2 PAS proposals must be aligned with the Local Housing Strategy (LHS) and must draw on the Housing Needs Assessment (HNA) that underpins the LHS. Inverclyde Council does not have an up to date HNA but is working with the other seven local authorities that comprise the Glasgow and the Clyde Valley Strategic Development Planning Authority, to produce a strategic Housing Needs and Demand Assessment (HNDA) which will inform the next LHS 2011-2016.
- 2.3 Kilmacolm, Inverkip, Wemyss Bay and Gourock are settlements where PAS could potentially be designated. Further research is required to determine this and is dependent on the production of the strategic HNDA, due in spring 2010. River Clyde Homes and Oak Tree HA own housing stock in these settlements and the Council would require their support for the PAS proposal to be made operational.
- 2.4 At present, only a small number of tenancies would be affected by the introduction of PAS but this is likely to increase as more tenancies complete the 5 year period of continuous occupation, so making PAS more effective. The Draft Housing (Scotland) Bill 2009 is also likely to change the criteria for the operation of PAS.

3.0 RECOMMENDATIONS

- 3.1 That Committee:

- a) note the case made for and against applying for PAS, especially in terms of the numbers that would be affected at present and the lack of supporting evidence currently held by Inverclyde Council; and
- b) endorse the option of waiting until the results of the HNDA are available and the outcome of consultation on the Draft Housing (Scotland) Bill is known next year, to assess whether PAS is a viable and appropriate mechanism for retaining more social rented housing in the settlements of Kilmacolm, Inverkip, Wemyss Bay and Gourock.

4.0 BACKGROUND

- 4.1 The Housing (Scotland) Act 2001 inserted new sections into the Housing (Scotland) Act 1987 that allowed the Scottish Ministers to designate any part of a local authority's area as a 'pressured area' following a proposal submitted by the local authority itself. The broad effect of designation is to suspend the 'Right-to-Buy' (RTB) for the local authority and Registered Social Landlord (RSL) tenants living in the area for a period of up to 5 years. The policy objective behind these provisions is to establish a mechanism for safeguarding the continued availability of social rented housing where the RTB could otherwise lead to serious shortages.
- 4.2 PAS suspends RTB for Scottish Secure Tenancies (SST) only, i.e. those tenancies introduced by the 2001 Act, and which came into force on 30 September 2002, and the suspension is for a period of five years. SST have 'modernised' RTB terms which are less generous than the 'preserved' rights enjoyed before that date and this change in itself, may serve to reduce the number of tenants exercising their RTB; the required length of continuous occupation has increased from two years to five years and the discount offered is substantially lower than previously.
- 4.3 The 2001 Act allows local authorities to propose the designation of any part of its area providing the specified criteria in guidance are met. Although the precise boundaries must be a matter for local determination, the areas should conform to recognised localities or neighbourhoods. In Inverclyde the areas considered worthy of examination for PAS are: Kilmacolm, Inverkip, Wemyss Bay and potentially Gourock. This preliminary assessment is based largely on the findings of the last HNA undertaken in 2004; the number of concerns expressed to Elected Members in these areas; and other anecdotal evidence recorded over the last 5-8 years.

Submission of Proposals : Requirements

- 4.4 A local authority is required to submit proposals to the Scottish Ministers which must satisfy the following criteria:
- the need for social rented housing (i.e. houses provided by the local authority or RSLs) in the area in question is, or is likely to be, substantially in excess of the social rented housing available; and
 - this situation is likely to be exacerbated by tenants in the area exercising their RTB.

The shortfall referred to in the criteria may be a current shortfall or one that is expected to arise in the future. The Scottish Government will be looking for detailed evidence that will demonstrate the criteria.

- 4.5 There is a statutory duty on local authorities, before submitting proposals in respect of specific areas, to consult:
- every RSL with houses in the proposed area;
 - bodies representing the interests of tenants or other residents living in the area;
 - any other persons as they think fit.

Looking at the potential areas for PAS, River Clyde Homes (RCH) and Oak Tree HA have houses in Gourock, Inverkip, Wemyss Bay and Kilmacolm that would be affected by PAS designation.

- 4.6 Kilmacolm, Inverkip, Wemyss Bay and Gourock are areas that could potentially fulfil the PAS criteria as they show characteristics of relatively high house values and low levels of social rented accommodation. This would require further detailed research, particularly on house values, household income, housing need, turnover and RTB sales to reach the level of detail the Scottish Government is looking for in the submission. The Council does not hold this level of detailed information at present.

- 4.7 PAS proposals must be aligned with the Local Housing Strategy (LHS) and must draw on the Housing Needs Assessment (HNA) that underpins the LHS.

Current Local Housing Strategy

- 4.8 Inverclyde Council's LHS 2004-2009 states 'that the Council will examine the feasibility of PAS in the outer villages over the course of the LHS'. This was undertaken in terms of the Local Plan following the Reporter's conclusions and recommendations arising out of the Public Local Inquiry into the Plan in spring 2004. A consultation was undertaken on an Alteration to the Plan, followed by draft Supplementary Planning Guidance, but this was withdrawn in late 2007 due to objections and likely legal challenges to the proposed policy, given the absence of a sound HNA evidence base that showed a 'substantial quantitative shortfall' of affordable housing provision in Inverclyde's settlements (in particular Kilmacolm), as required by SPP3 'Planning for Homes' and PAN74 'Affordable Housing'.

- 4.9 The 2007 LHS Annual Update, agreed by the Environment and Regeneration Committee), due to other pressing priorities (the Reprovisioning Programme of the Area Renewal Strategy), and the absence of a substantial shortfall recorded in the 2004-05 HNA (above), concluded the case for PAS in these settlements should await a new HNA and be considered as part of the next LHS (2011-16).

**[Min Ref:
20/03/07,
Para 263]**

The Evidence Base

- 4.10 Inverclyde Council does not have an up to date HNA and, under new Scottish Government guidance on SPP3, LHS and Housing Need and Demand Assessment Guidance (HNDA), all published in 2008, Inverclyde Council is working with the other seven local authorities that comprise the Glasgow and the Clyde Valley Strategic Development Planning Authority, to produce a strategic HNDA which will underpin the next LHS 2011-2016. The HNDA is an extensive technical exercise that will assess the housing market in the Glasgow and Clyde Valley region and will produce a housing requirement for all tenures including a quantitative current and future social housing requirement for Inverclyde and its constituent sub areas. The outcomes of the HNDA should be available by the spring 2010.

The Council as Strategic Housing Authority, Not Landlord

- 4.11 As the Council is no longer a landlord, PAS would only affect RSL stock in the designated areas. This indicates that RSL co-operation is imperative before submitting a proposal for PAS.
- 4.12 RCH has the largest amount of RSL stock in the settlements of Gourock, Inverkip, Kilmacolm and Wemyss Bay and Oak Tree HA has a small number of houses in Wemyss Bay. A total of 47% of this stock has Scottish Secure Tenancies with 'modernised' RTB terms i.e. terms that are less attractive than 'preserved' RTB terms. PAS only affects tenancies with 'modernised' terms; tenancies with preserved terms are unaffected and are free to exercise RTB regardless of PAS designation
- 4.13 Tenancies with 'modernised' terms can only exercise RTB after a five year period of continuous occupation thus PAS would have no additional effect during this period. In this context, if PAS came into place before the year-end, it would in effect suspend RTB for only five tenancies in Kilmacolm and two in Inverkip as the remaining SST are still within the five year continuous occupation period.

Local Authorities with Pressured Area Status

- 4.14 There are 12 local authorities which have secured PAS since the introduction of the 2001 Act:
1. East Renfrewshire - Eastwood area (October 7, 2005);
 2. Highland - all areas excluding Caithness, Sutherland and some estates in Inverness and Fort William (November 15, 2005);

3. South Ayrshire - 29 letting areas comprising much of Prestwick and Ayr, and rural settlements (February 10 2006);
4. Moray - Elgin, Lossiemouth, Forres and Forres rural (March 7, 2006), and Forres letting area (17 February 2009);
5. Fife - St Andrews and East Neuk (8 May 2006) and 13 west Fife villages (January 15, 2007);
6. Dumfries and Galloway - 69 villages of population less than 400 across the local authority area (June 5, 2006);
7. Perth and Kinross -21 letting areas across Highland Perthshire and in the rural areas around Perth (February 2, 2007);
8. Aberdeen - 35 letting areas across the city (September 5, 2007);
9. North Ayrshire -11 letting areas (14 May 2008);
10. Aberdeenshire - 88 letting areas (6 November 2008);
11. North Lanarkshire - Cumbernauld and Moodiesburn (2 February 2009); and
12. Stirling - 35 letting areas (26 March 2009);

4.15 At present there has been very little analysis completed by the Scottish Government which assesses the impact of PAS in the local authorities that secured the earlier designations.

Draft Housing (Scotland) Bill 2009

- 4.16 The Draft Housing (Scotland) Bill (published 27 April 2009) includes proposals for reforming pressured area designation that would devolve the process for designation to local authorities; there is also a proposal to increase the maximum designation period from five to ten years and to allow particular housing types and areas to be designated, which would enable local authorities to take local circumstances into account in addressing housing need through their LHS; given that the Bill is likely to be presented to the Scottish Parliament in 2010, it might be prudent to await the outcome of the parliamentary process.
- 4.17 The Background Paper that forms an annex to this report (Annex 1) provides more detailed analysis on the implications of securing PAS.

5.0 PROPOSALS

5.1 Taking the Background Paper into account and the key summary points outlined above, the following Pros and Cons of making a case for PAS can be stated.

Pros – the case for PAS

- 5.2 Designation would allow greater influence and control over the social rented stock, including the allocation of accommodation to households in need.
- 5.3 In the absence of any new build for social renting in the smaller settlements (not currently a priority for either RCH or the Scottish Government Housing Investment Division), designation would provide a means of controlling the future use of the limited social rented stock available.
- 5.4 On the assumption that it would take up to 9 months to one year to get Scottish Government approval for PAS, the potential estimated number of RCH households that would be affected could be almost doubled from the present estimates: from 5 to 11 in Kilmacollm; still extremely marginal in Inverkip (3); and from 41 to 74 in Gourrock.
[Note: there are no RCH tenants in Wemyss Bay and tenant information for Oak Tree HA was not available for analysis.]

Cons – the case against PAS

5.5 The existing HNA evidence base is inconclusive, for example the 2004-05 HNA concluded that there is no affordable housing provision shortfall in Inverclyde as a

whole, although a case could be made for a marginal requirement in some of the smaller settlements, including Kilmacolm and Inverkip, but based on a very small sample of households.

- 5.6 There is no up to date HNA: we have to await the Glasgow and the Clyde Valley SDPA strategic HNDA, due to be finalised in spring 2010.
- 5.7 Designation is of limited value and therefore likely impact, given the very small number of RCH households that would be affected by the suspension of RTB – currently a total of 48, made up of Kilmacolm (5), Inverkip (2) and Gourrock (41) combined; also limited impact in that it only covers a period of five years, although the Draft Housing (Scotland) Bill seeks to extend this to ten years.
- 5.8 While the 2001 Act states that local authorities should promote the case for PAS, in Inverclyde the case would require the full support and backing of RCH and Oak Tree HA, in addition to a full consultative process. It is unclear at this time whether RCH would have the appetite to progress with PAS given their substantial commitment to the on going priority of the Re-provisioning Programme.
- 5.9 We are unable to provide the evidence required to make the case for designation, for example an estimate of new social rented houses to be built in these settlements; evidence of demand for, and availability of, private rented accommodation that is affordable; and the impact on access to affordable housing of the increase in average house prices over the last 3 – 4 years.
- 5.10 Overall, designation would have a limited impact given the small numbers of ‘modernised’ RTB tenancies that would be affected by the introduction of PAS, and in contrast to the greater number that would fall outwith the policy (53% of all tenancies in the three settlements), although a higher proportion would be affected in Kilmacolm (currently 54%).

Summing-up

- 5.11 In respect of the key points for and against submitting proposals for PAS, it is proposed at present not to progress with it, rather to await the outcome of the HNDA in the spring 2010 and the outcome of consultation on the Draft Housing (Scotland) Bill. Once we have knowledge of the level of housing need in the areas concerned, we will be able to fully consider whether pursuing PAS is an appropriate mechanism to retain social rented housing in the designated settlements.

6.0 IMPLICATIONS

- 6.1 **Legal:** there are no direct legal implications arising from this report, although if the decision of the Committee is to proceed with a submission for PAS, advice would be sought from the Head of Legal and Administrative Services.
- 6.2 **Finance:** there are no financial implications arising from this report.
- 6.3 **Personnel:** there are no personnel implications arising from this report.
- 6.4 **Equalities:** When delivering services to our customers, full cognisance is taken of equality and diversity processes and procedures, and in the case of this report, there would be no impact on the Council's Equalities Policy.

7.0 CONSULTATION

- 7.1 This report has been prepared with information provided from RCH and Oak Tree HA, but there has been no specific requirement for the Chief Financial Officer, the Head of Legal and Administrative Services or the Head of Organisational Development and Human Resources to make comment.

8.0 CONCLUSION

- 8.1 Having assessed the case for, and against, applying for PAS status for prescribed Inverclyde settlements, it is considered on balance that it would be prudent to wait until after the results of the HNDA are published in spring 2010, and the outcome of the parliamentary process on the Draft Housing (Scotland) Bill is known, before further consideration is given to the merits of applying for PAS.

9.0 BACKGROUND PAPERS

- 9.1
- (1) Pressured Area Status – A Case for the Settlements of Kilmacolm, Inverkip, Wemyss Bay and Gourrock
 - (2) 2007 LHS Annual Update (July 2007)
 - (3) Inverclyde Local Plan 2005: Supplementary Planning Guidance on 'Affordable Housing Provision' - Final Draft Report (August 2006)
 - (4) Draft Housing (Scotland) Bill (published 27 April 2009)

ATTACHMENT

Annex 1: Pressured Area Status – A Case for the Settlements of Kilmacolm, Inverkip, Wemyss Bay and Gourrock

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Greenock

7th August 2009

SSC Cmtee 2009 PAS Case Rpt (Sept 09)

Background Paper: Pressured Area Status - Case for Kilmacolm, Inverkip, Wemyss Bay, and Gourrock

1. Introduction

- 1.1 The settlements of Wemyss Bay and Gourrock and in particular the villages of Kilmacolm and Inverkip, are characterised by higher than average house prices and low quantities of social rented stock. To maintain a wide housing choice in these settlements, there is potentially a need to help preserve the social rented stock; Pressured Area Status (PAS) is a mechanism which can help do this. Below is an outline of the criteria for PAS proposals and the effect of PAS on designated followed by a brief investigation of how PAS could effect the settlements of Kilmacolm, Inverkip, Wemyss Bay and Gourrock.

2. Pressured Area Status (PAS)

- 2.1 The Housing (Scotland) Act 2001 inserted new sections into the Housing (Scotland) Act 1987 that allowed the Scottish Ministers to designate any part of a local authority's area as a "pressured area" following a proposal submitted by the local authority itself. The broad effect of designation is to suspend the RTB for certain tenants living in the area for a period of up to 5 years. The policy objective behind these provisions is to establish a mechanism for safeguarding the continued availability of social rented housing where the RTB could otherwise lead to serious shortages.

3. The Criteria for Designation

- 3.1 The 2001 Act sets out two specific criteria which must be met before the Scottish Ministers can designate an area:
- the need for social rented housing (i.e. houses provided by the local authority or RSLs) in the area in question is, or is likely to be, substantially in excess of the social rented housing; and
 - this situation is likely to be exacerbated by tenants in the area exercising their RTB.
- 3.2 The shortfall referred to in the first of the two criteria may be a current shortfall or one that is expected to arise in the future. It is necessary for both criteria to be met. The Scottish Ministers only have authority under the Act to designate areas where they are satisfied that these criteria apply.

4. The Effect of the Designation

- 4.1 The effect of the designation is to suspend the RTB for the following tenants living in the area:
- those who have taken out a new tenancy in the area on or after the introduction of the Scottish secure tenancy (effectively tenancies after 30th September 2002);
 - those with tenancies created before the introduction of the Scottish secure tenancy who did not previously have a RTB entitlement - these will be principally tenants of RSLs with assured tenancies (except for those with a preserved RTB);
 - all those who have succeeded, following the introduction of the Scottish secure tenancy, to tenancies initially created beforehand irrespective of the terms on which they would be able to exercise their RTB entitlement in the absence of the pressured area designation.
- 4.2 Tenants with tenancies created before the introduction of the Scottish secure tenancy (before 30 September 2002) and which were converted to Scottish secure tenancies will, therefore, not be affected by the suspension providing:
- before the introduction of the Scottish secure tenancy they had a RTB entitlement (whether or not this is with their current landlord), as a result of having a secure tenancy or an assured tenancy with a preserved RTB;
 - they have not succeeded to their tenancy after the introduction of the Scottish secure tenancy.
- 4.3 The suspension will be for a period of 5 years or less. Although 5 years is the maximum period allowed for each designation, it is open to local authorities to propose a further designation.

4.4 It is important to note that the PAS is for designation of all houses in the specified area and cannot be used to designate houses of a particular size or type unless the area entirely consists of houses with these characteristics.

5. Selection of Designated Areas

5.1 In drawing up proposals, the Scottish Government expects local authorities to take account of their local housing strategies or, if these have not yet been finalised, any preliminary work that has been undertaken. Although the process of approving proposals for the designation of pressured areas is separate and distinct from the submission of local housing strategies to the Scottish Ministers, the Scottish Government will expect such proposals to be consistent with the local housing strategy. It would be for the local authority to decide whether to also include detailed supporting evidence in its local housing strategy or simply identify in the strategy relevant areas for designation, the rationale for this designation and how it would be implemented.

5.2 The 2001 Act allows local authorities to propose the designation of any part of its area providing the specified criteria are met. Although the precise boundaries must be a matter for local determination, the Scottish Government view is that the aim should be to identify recognised localities or neighbourhoods. In rural areas, these may well be recognised settlements; in urban areas they might be identifiable estates or neighbourhoods.

5.3 There is a statutory duty on local authorities, before submitting proposals in respect of specific areas, to consult:

- every RSL with houses in the proposed area;
- bodies representing the interests of tenants or other residents living in the area; and
- any other persons as they see fit.

5.4 It will be for local authorities to decide what information should be submitted to demonstrate that the statutory criteria are met. The Scottish Government will expect the information submitted in support of the designation to address both of the statutory criteria (above), but the precise nature of the information required is likely to vary according to the size and nature of the proposed pressured area. It is anticipated that local authorities will want to draw on the assessment and analysis of housing needs which underpins their local housing strategies where these are available and current. In very broad terms, the Scottish Government will look for information along the following lines:

- Evidence of a substantial shortfall in social rented accommodation in relation to need:
 - the number of social rented houses expected to become available for let to households not currently in the social rented sector in the area through relets and new building over the period of the proposed designation, together with any evidence of land values having an adverse effect on the ability to build;
 - an estimate of the need for social rented housing from households not currently housed in the sector over the period proposed for the suspension;
 - where possible, it may also be helpful to examine evidence of pressure in the private sector, arising from the demand by households for the available private housing stock or a reduction in the supply of private sector housing - relevant evidence might be above average increases in house prices in the area in question.
- Evidence on the impact of the RTB on the shortfall of social rented housing in relation to need
 - an estimate of the annual average number of RTB sales and, where possible, an estimate of the percentage of the total social rented sector in the area (including those that are exempt from the RTB) that have been sold since 1980;
 - an assessment of whether the current annual average sales is likely to change over the period of the designation with the reasons for this assessment;
 - evidence on the impact or likely impact of RTB sales and, in particular, whether re-sales have led, or are likely to lead to a shortage of housing for households in housing need.

5.5 Evidence of this manner can only be extracted from a formal housing need assessment such as the Glasgow and Clyde Valley Housing Need and Demand Assessment (GCV HNDA) which Inverclyde Council is currently involved in. The assessment will produce a housing requirement for all sectors including the social rented sector and the owner occupied sector. The results of this assessment

will show whether there is a strong need in certain areas in Inverclyde and how this is likely to change in the future. The GCV HNDA is projected to be completed by the spring/summer of 2010.

- 5.6 Evidence on the impact of RTB is more difficult to pull together as it requires some assumptions about the future behaviour of households but the GCV HNDA is likely to assist with this.

6. Gourock, Inverkip, Kilmacolm and Wemyss Bay

- 6.1 As outlined above, the Housing (Scotland) Act 2001 sets out the criteria which local authorities follow in order to achieve PAS for a designated area it sets out the effect of the designation. PAS will only suspend RTB for tenancies that started after 30 September 2002 (the day the Act came into force) for a period of five years. Tenancies after this date are called Scottish Secure Tenancies and contain less generous RTB terms than previously i.e. the size of discount is smaller and the length of time before a tenant is eligible to exercise RTB is longer. These are often called 'modernised' RTB terms. Tenancies that were undertaken prior to the 30 September 2002 have 'preserved' RTB terms i.e. the original RTB conditions have been preserved despite the introduction of the Housing (Scotland) Act 2001 and the new tenancy agreement.
- 6.2 The table below shows the RTB terms for River Clyde Homes (RCH) tenants in Kilmacolm, Inverkip and Gourock on the 31 March 2008. RCH does not hold any stock in Wemyss Bay but Oak Tree HA has eight properties there together with 40 properties in Gourock. Unfortunately, information on Oak Tree HA tenancies was unavailable for this analysis. The tenancies with modernised RTB terms represent households that would be affected by the suspension of RTB through PAS.

Table 1: RTB terms for RCH tenants in Kilmacolm, Inverkip and Gourock

| Settlement | Preserved RTB | | Modernised RTB | | Total |
|------------|---------------|-----|----------------|-----|-------|
| | No | % | No | % | |
| Kilmacolm | 33 | 46% | 39 | 54% | 72 |
| Inverkip | 11 | 69% | 5 | 31% | 16 |
| Gourock | 219 | 53% | 193 | 47% | 412 |
| Total | 263 | 53% | 237 | 47% | 500 |

- 6.3 The table illustrates that across the three settlements just under half of RCH's tenants have tenancies with modernised RTB terms i.e. they would have their RTB suspended if the area was designated as pressured. It's worth highlighting here that the modernised terms are a lot less generous than preserved RTB terms and modernised terms in their own right are likely to contribute to a decline of RTB sales. A tenancy with modernised RTB terms can obtain a discount of 20% for any property following five years continuous occupation, rising to a maximum discount of 35% or £15,000 whichever is the lower. Discount levels increase by 1% for every year of continuous occupation following the initial two year qualifying period. In comparison, a tenancy with preserved terms can obtain a minimum discount of 32% for a house and 44% for a flat following two years occupation, rising to a maximum discount of 60% for a house and 70% for a flat. Discount levels increase by 1% for every year of occupation for a house and 2% for every year of occupation for a flat following the initial two year qualifying period.

- 6.4 The table below shows the length of occupation by tenancies with modernised terms.

Table 2: Tenancy length for tenancies with modernised terms in Kilmacolm, Inverkip and Gourock

| Year: | 2009 | 2010 | 2011 | 2012 | | | | Total |
|--------------|-----------|-----------|-----------|-----------|-----------|-----------|----------|------------|
| Settlement | 6 years | 5 years | 4 years | 3 years | 2 years | 1 year | <1 year | |
| Kilmacolm | 2 | 3 | 6 | 12 | 5 | 9 | 2 | 39 |
| Inverkip | 2 | 0 | 1 | 1 | 1 | 0 | 0 | 5 |
| Gourock | 20 | 21 | 32 | 45 | 27 | 43 | 5 | 193 |
| Total | 24 | 24 | 39 | 58 | 33 | 52 | 7 | 237 |

- 6.5 The table shows there are 48 tenancies with modernised terms that are over 5 years length therefore able to exercise their RTB. This means if these areas were designated as 'pressured' today only the RTB of 48 tenancies would be suspended; in Kilmacolm this would only affect 5

tenancies and in Inverkip it would only affect 2 tenancies. In the future, this number is likely to increase due to more tenancies reaching the 5 year benchmark to exercise RTB.

7. Summary

7.1 Below is a summary of the key points:

- PAS suspends RTB for Scottish secure tenancies;
- Scottish secure tenancies have RTB terms which are less generous than previous tenancies;
- PAS proposals must be aligned with a local authority's LHS and must draw on the housing need assessment that underpins the LHS;
- Inverclyde Council's LHS 2004-2009 states that the Council will examine the feasibility of PAS in the outer villages over the course of the LHS;
- Inverclyde Council does not have an up to date housing needs assessment and is working with the local authorities in the Glasgow and Clyde Valley area to produce a regional HNDA which will underpin the 2011 LHS;
- RCH has the largest amount of RSL stock in the settlements of Kilmacolm, Inverkip and Gourock; 47% of the stock has Scottish secure tenancies with modernised RTB terms; and
- If PAS came in to place today, it would in effect suspend RTB for 5 tenancies in Kilmacolm, and 2 tenancies in Inverkip - these are tenancies where the RTB is currently 'live'.

Planning and Housing
Inverclyde Council

May 2009 File Ref: H.1.3/VK

[H: Pressured Area Status Case (11 05 09 (2))]