Introduction
1. Angus Council welcomes the opportunity to comment as part of the consultation with the Financial Committee’s scrutiny of the Financial Memorandum.

Consultation
2. Angus Council did take part in the Scottish Government consultation exercises which preceded the Bill, and we did make comments on the financial assumptions made.

3. We believe that our comments on the financial assumptions have been accurately reflected in the Financial Memorandum.

4. We had sufficient time to contribute to the consultation exercise.

Costs
5. The Bill will have financial implications for us, but we believe that the assumptions being made are reasonable.

6. The estimated costs and savings set out within the Financial Memorandum and projected over 15 years for each service sound reasonable. However, we are concerned with the potential cost implications of Part 5 – mobile home sites with permanent residents. The Bill only deals with permanent sites and does not address the issue of “holiday” sites. The boundaries between the two in practical terms are very often blurred, as many sites have a mix of permanent and so called holiday lets. It can be very difficult (and therefore resource intensive) to police licensing and planning permission issues on the ground. It is also currently unclear where migrant worker sites sit within these classifications – our belief is that they should be included as permanent sites, but again, this has cost implications in terms of administration for local authorities.

7. In Angus, breaches of planning permission and breaches of site licence are quite common, so we are not convinced that the Bill has sufficient cost efficient tools and penalties to deter and tackle misbehaviour until further legislation is introduced which also addresses holiday and migrant worker sites.

8. We are confident that we will be in a position to meet the financial costs that will be associated with the Bill with the exception of Part 5, mobile home sites with permanent residents where there could be a risk financially as we have explained in question 5.

9. The Financial Memorandum accurately reflects the uncertainty associated with the estimates and the timescales over which such costs would be expected to
arise, again with the exception of Part 5, mobile home sites with permanent residents.

**Wider Issues**

10. We believe that with the exception of part 5, the Financial Memorandum does for the most part capture associated costs with the Bill. However, there it is likely that there would be additional costs to the council to take action where there are breaches of site licence until further new legislation is introduced.

11. We believe that for the most part there will be no direct costs associated with this part of the Bill, with the exception of Part 5 – mobile home sites with permanent residents. However; at the moment it would be difficult to quantify any future costs that might arise until the Bill comes into force.

**Conclusion**

12. Angus Council welcomes the opportunity to work with The Scottish Government to help improve housing in Scotland. We have high quality housing stock which will meet the SHQS by 2015, have the fourth lowest rents, and have a low level of borrowing. We therefore have a track record of managing our business for the benefit of our customers in a way that delivers real housing outcomes for both tenants and the wider community. We believe that the new Housing Bill will strengthen our position without imposing too many additional costs. However we are concerned that there could be resource issues for local authorities, particularly with Part 5, mobile home sites with permanent residents. If further legislation was introduced which addressed the wider issues around holiday and migrant worker sites, this would help to clarify the sector within Angus and elsewhere, and Angus Council would be in a better position to assess cost implications in the round.