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## RESPONDENT INFORMATION FORM

### FIRM FOUNDATIONS: THE FUTURE OF HOUSING IN SCOTLAND

Please complete the details below and return it with your response to the above address. This will help ensure we handle your response appropriately. Thank you for your help.

Name: WILLIAM KYLE

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APPLECROSS DEVELOPMENTS

1. Are you responding: (please tick one box)

(a) as an individual  go to Q2a/b and then Q4

(b) on behalf of a group/organisation  go to Q3 and then Q4

### INDIVIDUALS

2a. Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government website)?

Yes  (go to 2b below)

No, not at all  We will treat your response as confidential

2b. Where confidentiality is not requested, we will make your response available to the public on the following basis (please tick one of the following boxes)

Yes, make my response, name and address all available

Yes, make my response available, but not my name or address

Yes, make my response and name available, but not my address

### ON BEHALF OF GROUPS OR ORGANISATIONS:

3. The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Government website). Are you also content for your **response** to be made available?

Yes  No  We will treat your response as confidential

### SHARING RESPONSES/FUTURE ENGAGEMENT

4. We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for the Scottish Government to contact you again in the future in relation to this consultation response?

Yes  No

## **Questionnaire**

### **Firm Foundations: The Future of Housing in Scotland**

As a private house builder we have chosen to answer only those questions where we have a detailed knowledge of the topic or where there is a significant impact on our sector of the industry.

**Question 1:** Do you agree that aiming to increase the rate of new housing supply in Scotland to at least 35,000 a year by the middle of the next decade is a sensible and realistic ambition, and that this will help set a necessary political context for acceleration in housing supply?

**Response:** The aim to increase housing supply to at least 35,000 per annum should be a realistic goal, indeed it should be possible for the industry to deliver closer to 50,000 per annum. The context set through this exercise will need to be followed through the Strategic Development Plan and Local Development Plan process to have any chance of delivery. A strong link between government and local authority will be required to deliver this. The preparation of SDP and LDP is being changed significantly at present and this will inevitably cause a delay before any changes can take effect. It should also be acknowledged that a number of delays occur at committee stage and it is essential that applications reaching this stage are decided upon by a group who are in possession of all the relevant information and well versed in the processes and procedures they operate within.

**Question 2:** Do you agree that, to give practical effect to the ambition, local authorities should co-operate regionally in setting realistic housing targets for housing market areas, and in enabling the delivery of these targets? If so, what arrangements should be put in place to support and provide incentives for such co-operation between relevant local authorities?

**Response:** It is essential that relevant local authorities co-operate, particularly in Scotland's main City Regions. This will be required to ensure that housing is directed to locations which meet demand, ensure sustainable growth in housing numbers which are targeted towards main employment centres and can be adequately serviced i.e. linked to key transport corridors. It is clear that cross local authority working will require a greater time commitment and a more strategic view than working in isolation. It is important to ensure that staff are well enough trained to do this and that local authorities have sufficient funding and resources allocated. Clear direction should also be provided to Local Authorities from the Scottish Government via SPP3 and similar guidance.

**Question 3:** Is there a role for a specialist national function to provide expert support for local authorities in strategic planning for housing? What expertise do you think this function would require?

**Response:** It would certainly be of benefit to have specialised national function to support which Local Authorities can draw on, preferably from within the Scottish Government team responsible for producing the planning legislation. This would provide a consistency of approach to the implementation of planning aims at a

Scotland wide level. There should, within each local authority, be the relevant expertise to deliver the authorities strategic planning for housing within the national framework provided that framework is robust and workable enough to provide the proper direction and the national function would exist to support and guide this. The status of many Local Plans would suggest that local authorities are currently under resourced in terms of strategic planning for housing and other development so a national function may be able to provide support for this also.

**Question 4:** Even when land has planning permission there are still blockages that prevent new housing being built. What additional arrangements would, or could, accelerate development on land with planning permissions to help ensure that future housing supply targets are met?

**Response:** It is essential that when planning permissions are granted that they are for deliverable developments that best meet market demand in a particular area. It is also vital to differentiate between “consent” and “implimentatble consent”. Land with outline consent should not be automatically considered as implimentable when the reserved matters process can be complex and add considerable delay and uncertainty. That aside, delays in the provision of infrastructure, particularly water and power connections can cause considerable delays. Early engagement with utility providers by developers is essential to ensure that sites which are likely to be consented for housing. There needs to be a willingness to engage all parties at an early stage to deliver this.

Delays can also result from the requirement for complex S.75 or other planning agreements. Some standardisation in the type of agreements requested could simplify this process.

**Question 5:** We have proposed that much expanded or new, stand-alone settlements may be a valid solution. How should we best encourage the development of new, sustainable communities that are sympathetic to Scotland's landscape and environment?

**Response:** It seems clear that much expanded and perhaps new, stand-alone settlements will need to be developed to meet the housing targets proposed. Brownfield and infill development alone cannot provide the numbers or range of housing required. Planning policy together with Strategic Development Plans and Local Plans need to support and encourage the identification of locations which can provide sustainable solutions. There must be an acknowledgement that the best physical locations may well exist within Green Belts and that policy needs to be flexible enough to allow the right proposals to proceed in these locations. New communities adjacent to settlements can provide additional support for existing local facilities and can benefit from locations close to main transport corridors, allowing existing public transport to be supported. Efficient use of infrastructure including transport, water, power and other resources are essential in identifying the most sustainable locations for new development.

**Question 8:** Should the Government provide direct cash grants to first-time buyers?

**Response:** There would not appear to be any a case for such a direct intervention in the housing market to aid first time buyers. Any available funding here would be better allocated to alternative measures. Direct contributions to first time buyers is likely to lead to increased inflation in the very area of the market which first time buyers are attracted to. Not all first time buyers are in the same financial situation and contributions to those who can already afford to join the housing market will not aid the first time buyer market as a whole.

**Question 9:** How can the private house-building sector play a bigger role in providing, without public subsidy, increased provision of affordable starter homes?

**Response:** While current planning advice would suggest that affordable housing can take a number of forms, planning authorities individual policies are more prescriptive in terms of proportion of units and often the only acceptable tenure will be via S.75 agreement and involvement of a registered social landlord.

Clear, practical guidance to be adopted by planning authorities as to what would constitute "affordable" housing out-with the remit of a Registered Social Landlord would be helpful. e.g. 1 bedroom flat at c.600sq ft sold at £x. Calculations can be based on single or double salary based on expected occupancy of units. House-builders would quickly adapt to providing this in lieu of land to an RSL or as a balanced package with some RSL units.

Space standards within building regulations and the Variable Needs Assessment results in homes being larger than the private sector would build and that the market would demand for first time buyers / affordable rent. These restrictions, while ensuring that homes are adaptable and can cater for all sectors of the market prevent some genuinely affordable homes being made available.

**Question 16:** Do you agree that we should exempt new build social housing from the Right to Buy?

**Response:** It seems clear that there is a continued need for social housing which is available to rent, an area of the market previously supported by considerable stocks of council housing. It would not seem appropriate to continue to develop social housing, some of which will be delivered via Local Authority Affordable Housing Policies, only for this to be sold on and then become part of a privately owned sector which is not available to those in need of housing.

**Question 24:** Do you think that subsidies for development should be provided to bodies other than registered social landlords?

**Response:** With the correct structure in place it would seem that bodies other than Registered Social Landlords would be capable of providing affordable housing for rent, and therefore be eligible for development subsidies. This could extend to landowners, developers and other commercial organisations but would need to be governed by a well considered framework to ensure that the aim of affordable housing provision is met and retained in the future.