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From: Derek Logie [derek@ruralhousingscotland.org]
Sent: 24 January 2008 13:55
To: Housing Consultation 2007
Subject: Response from the Rural Housing Service

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has been swept for the presence of computer viruses.

Please find attached the response to Firm Foundations from the Rural Housing Service.

This is attached as a PDF file. It has also been sent by post.

Regards

Derek Logie
Chief Executive
Rural Housing Service
55 Newtown Street
Duns
Berwickshire
TD11 2AS

01361 884698
07824318337
skype: rhsderek

derek@ruralhousingscotland.org
www.ruralhousingscotland.org

Firm Foundations: the future of housing in Scotland

Response from the Rural Housing Service



Executive Summary

- We welcome the proposed increase in overall housing supply. We would however also like to see targets for the delivery of affordable housing in rural Scotland. Specifically we would support targets for the development of affordable rented housing in rural Scotland. (Q1)
- We have concerns that the assessment of housing need and the means of meeting it is expected to take account of wider housing market areas. We do not believe that rural housing needs can be met by housing development in urban environments. This strategy will lead to the development of an exclusive countryside where only rich people can afford to live. We contend that in all rural areas the assessment of housing need and means of meeting it should be locally targeted. (Q2)
- We commend the role of Rural Housing Enablers in improving local authorities' and housing agency knowledge of housing needs in small rural communities to enable housing investment to be appropriately directed. They also have a vital role in increasing affordable housing opportunities by raising awareness of housing options. The Rural Housing Service has demonstrated the added value these posts bring to rural housing development in Argyll and Aberdeenshire, and we will be launching a new service in Moray in Spring 2008. (Q1)
- Rural Housing Enablers are also instrumental in bringing forward projects to diversify supply of rural housing through Rural Home Ownership Grants, Rural Empty Property Grant and rural leasing schemes. We welcome the support for these measures in the paper. (Q6, 12, 15)
- We commend the role of community land trusts in delivering land for housing. Communities such as Gigha and Knoydart have been instrumental in buying and releasing land to deliver affordable housing. More communities could perform a similar function given funds to acquire and assemble land through a national landbank fund.
- We welcome the proposals regarding alternative providers of affordable rented housing. We would like to see community trusts supported by grants to build and renovate housing in their communities enabling real community ownership of housing. We support the extension of subsidy to private landowners as this will help to increase and diversify the supply of rural housing particularly in small communities, Subsidy should be dependent on the landowner entering a landlord accreditation scheme. (Q24)
- We propose the rural proofing of local authority Local Housing Strategies and Strategic Housing Investment Programme proposals and the resultant large scale procurement tenders to ensure they address locational and rural priorities. (Q1, 3, 18)

- We support the abolition of Right to Buy for new build social housing but believe that the Modernised Right to Buy should be abolished to increase the stock of affordable rural housing in Scotland. (Q16)
- We believe that LIFT should be targeted to enable those in social housing who wish to enter home ownership to do so. (Q6, 16)
- We support the development of new settlements with high environmental and sustainability standards and believe these could be developed on a micro scale as small clusters of houses in the countryside, encompassing a variety of tenures. This measure is proposed in SPP 15 but has not been implemented by many local authorities. (Q5)
- We propose the introduction of compulsory purchase or the de-zoning of land which has not been brought forward for development. This is particularly important in bringing forward sites which have been allocated specifically for affordable housing. (Q4)
- Unblocking infrastructure constraints is a cross cutting issue and needs to be a focus for rural development policy as well as housing policy. (Q4)
- We propose the development of housing allocation policies to permit RSLs and local authorities to support a wider rural development and sustainability agenda in the allocation of their houses in small, remote and island communities. (Q23)
- The goal of creating sustainable mixed rural communities is dependent on the development of more social housing stock. (Q23)

Introduction

The lack of affordable housing is the most important issue in rural Scotland today¹. Rural Scotland is undergoing a renaissance; the population is increasing; half of all business start-ups take place in rural Scotland; broadband has increased the scope for education and employment; and young people are choosing to remain or return to rural communities. The quality of life in our rural communities means that more and more people are choosing to live in rural Scotland. This should be positive news, but with this population growth has come huge growth in house prices and a lack of affordable rural housing, resulting in people who grew up or who work in rural Scotland not being able to afford to live there: whilst a shortage of social housing means there are few alternatives to buying a house.

Rural Scotland urgently requires a housing policy which meets these challenges; a policy which delivers more affordable rural housing, enables people to remain, return to or choose to live in rural Scotland; a policy which supports the economic and social development of our rural communities.

The Rural Housing Service welcomes the opportunity to comment on the proposals outlined in the discussion paper, Firm Foundations, and we are heartened by the specific comments on rural housing made in the paper “to assist delivery, to encourage innovation and to address the obstacles which currently exist”.

¹ Rural Gateway

Many of the obstacles to the supply of rural housing are imposed by the current planning system and we will be making a full response to the SPP3 Planning for Housing consultation.

We welcome many of the proposals in Firm Foundations particularly those related to increasing the diversity of supply through alternative providers of affordable housing, the reuse of empty properties and rural leasing schemes; the proposal to abolish the Right to Buy for new build social housing; the steps to create a national landbank function; and the encouragement of the creation of new settlements.

We welcome the Government's commitment to engage with rural housing agencies to address rural housing issues and we welcome the encouragement of innovation to increase rural housing delivery. We believe that Rural Housing Enablers have a crucial role in delivering a diversity of affordable rural housing options and overcoming the obstacles which exist. Rural Housing Enablers will assist the implementation of the proposals on diversity of supply, assessment of housing need, reuse of empty property; community engagement and planning innovation. We have successfully piloted two Rural Housing Enablers in Aberdeenshire and the Argyll Islands and launch a new project in Moray in April. We believe they provide a locus for ensuring that rural housing issues are to the forefront of planning for the delivery of affordable housing and as an independent voice form an important link between communities, landowners and the public sector.

Rural Housing Service

The Rural Housing Service is a Scottish charity which supports rural communities to develop practical solutions to local housing problems. We provide advice and information on housing issues and help create new housing opportunities for local people by utilising all of the options available. The Rural Housing Service works with rural communities across Scotland and has helped communities such as Gigha, Laggan and Durness create affordable housing solutions. We are a free service and work with any rural community in Scotland to resolve local housing issues.

We employ a Chief Executive, a Rural Housing Enabler in Aberdeenshire and an Administrator. We are funded by the Scottish Government and charitable trusts. The Aberdeenshire Rural Housing Enabler is funded by Aberdeenshire Council, Cairngorms National Park Authority, Communities Scotland, MacRobert Trust and the SRPBA.

The Rural Housing Service is a membership organisation with members from across rural Scotland representing communities, local authorities, housing associations, trusts and others. The service is managed by a Board of Directors.

Derek Logie
Chief Executive
25 January 2008

Firm Foundations - Rural Housing Service responses to specific questions.

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?

At the core of rural housing issues is the lack of supply of affordable housing in rural areas. We therefore welcome the proposed increase in overall housing supply. We would however also like to see targets for the delivery of affordable housing in rural Scotland. Specifically we would support targets for the development of affordable rented housing in rural Scotland. There is a far lower proportion of social rented houses in rural areas and a significant need for this tenure.

The paper describes the lack of choice social tenants have in their landlords; in many rural communities there is no social housing choice; the choice of those in housing need is a private let, an expensive house, or to leave their community. We have concerns that the proposed reductions in subsidy will result in development of increased levels of LCHO at the expense of more subsidy intensive social rented housing.

We welcome the more strategic approach suggested to ensure that sufficient land is allocated to meet housing needs. There is however a need for local housing needs analysis and Local Housing Strategies to be sufficiently fine grained to recognise need arising in small rural communities to aid the allocation of land in villages.

We commend the role of Rural Housing Enablers in improving local authorities and housing agency knowledge of housing needs in small rural communities to enable housing investment to be appropriately directed. They also have a vital role in increasing affordable housing opportunities by raising awareness of housing options and helping develop new housing in villages.

There are over 40 RHEs working across rural England and supported by DEFRA and the DCLG. The recent Affordable Rural Housing Commission wholeheartedly endorsed their role in delivering affordable rural housing. The approach is also supported in recent research by Tribal HCH². The Rural Housing Service has demonstrated the added value these posts bring to rural housing development in Argyll and Aberdeenshire, and we will be launching a new service in Moray in Spring 2008.

The supply of affordable rural housing also depends on a revision of the *planning default position* that “assumes that rural communities are basically unsustainable unless they enjoy the full panoply of services – shop, post office, school, pub, public transport... (and) that, from a greenhouse gas perspective, rural settlements are intrinsically unsustainable”³ This position prevents housing development in small rural communities and excludes people on low incomes from these communities. We believe this definition of sustainability is too narrow and consider sustainability to encompass social, economic and community as well as environmental considerations.

In addition to an overall change in planning culture, there are specific instruments which can be adopted to secure affordable rural housing; such as Rural Exceptions policies and the allocation of land specifically for affordable housing.

² Allocation Of Land For Affordable Housing Through The Planning System Tribal HCH 2006

³ Stuart Burgess, Commission for Rural Communities speech to the ACRE Conference 2007

While we support the aspiration to the integration of land use highlighted by the Prince's Foundation, this can only be achieved where sufficient land is allocated for development. Housing land is an artificially scarce resource in rural communities necessitating its exclusive use for housing.

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

Whilst we recognise that housing market areas cross local authority boundaries we believe that targets for rural housing development should be developed within the context of the rural strategy of each local authority. The housing requirement for a housing market area may be satisfied by several large urban developments, however rural housing development, particularly affordable rural housing development may be required for reasons of social equity, economic development, service delivery and community development. Rural housing development is intrinsically linked to our ambitions and strategy for our rural areas.

We have concerns that the assessment of housing need and the means of meeting it is expected to take account of wider housing market areas. We do not believe that rural housing needs can be met by housing development in urban environments. This strategy will lead to the development of an exclusive countryside where only rich people can afford to live. We contend that in all rural areas the assessment of housing need and means of meeting it should be locally targeted. For example housing need in Barra can not be met by building housing in Stornoway; similarly housing need in Humbie is not addressed by building in Haddington.

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?

We believe there is a role for a specialist national function in the strategic planning of housing. From a rural perspective we would expect the function to help local authorities **rural proof** their strategic housing plans to ensure that the needs of rural communities are adequately met. To help local authorities better understand rural housing needs, the specialist national function could provide support to develop a network of Rural Housing Enablers alongside local authority funding.

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?

Infrastructure constraints are a continuing blockage on rural housing development. Further resources are required to provide adequate water and sewerage capacity to enable new housing development in many rural communities. This investment is a national priority;

important to meet rural housing need but also important to help sustain and develop our rural communities; as such, unblocking infrastructure constraints is a cross cutting issue and needs to be a focus for rural development policy as well as housing policy.

We would support the introduction of compulsory purchase or the de-zoning of land which has not been brought forward for development. This is particularly important in bringing forward sites which have been allocated specifically for affordable housing, where experience suggests some landowners/developers will sit on this land waiting for a wider housing designation.

The viability of some housing association developments can also be hit by the request for developer contributions by local authorities for affordable housing development.

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?

Planning for Rural Development (SPPI5) highlights how rural areas are changing; there are more people now able to live and work in the countryside, broadband is making many different kinds of employment and business start up possible in rural Scotland. It does not follow anymore that new house building in the countryside will increase commuting.

We therefore support the development of new settlements with high environmental and sustainability standards and believe these could be developed on a micro scale as small clusters of houses in the countryside, encompassing a variety of tenures.

While we support larger developments such as such as Tornagrain and An Camas Mòr which are proposed as distinct/ separate settlements; new settlements which lead to the virtual coalescence of neighbouring towns/villages should be avoided.

Land Assembly

We support the development of solutions to permit disposal of public sector land at less than market value to secure affordable housing, and welcome the review of the Scottish Government's estate. While we believe that there may be a role for central government in land assembly we commend the role of community land trusts in delivering land for housing. Communities such as Gigha and Knoydart have been instrumental in buying and releasing land to deliver affordable housing. These sites are often released by landowners specifically for affordable housing and through rural housing burdens imposed by community trusts, housing built on this land can be retained as affordable in perpetuity. Community trusts complement the activities of rural housing enablers providing land on which projects developed by Enablers can be realised. More communities could perform a similar function given funds to acquire and assemble land through a national landbank fund.

Question 6:

How should different types of assistance within LIFT be targeted?

Rural first-time buyers are a rare breed even rarer than their urban counterparts. We are therefore very pleased to note the focus on initiatives for first-time buyers. The primary mechanism proposed is shared equity, this has been successful as Homestake and we

support the expansion of the open market version which we believe has particular application to rural areas.

We note that it is intended to review the operation of shared equity alongside Rural Home Ownership Grants. RHOGs have been an important grant support to enable the construction of new low cost homes in rural communities and we would like to see the continuation of support for low cost new build. We help promote RHOGs in the Scottish Borders and are aware that as land and tender prices increase the level of grant required for RHOGs has increased substantially as have the income levels required to be able to develop through RHOGs. The proposed review should investigate whether the grant should be replaced by an equity stake.

Both LIFT and RHOGs need adequate promotion, advice and information provision. An analysis of RHOGs across Scotland reveals that where this is not in place there is poor uptake.

Where we have operated Rural Housing Enablers, in Aberdeenshire and the Argyll Islands there has been a corresponding increase in interest in RHOGs. We believe that Rural Housing Enablers perform a crucial role in raising awareness of affordable housing opportunities and can help extend the reach of LIFT and RHOGs.

The development of RHOGs or shared equity self procurement requires a planning system which provides opportunities for the development of affordable housing in the countryside. We would like to see SPP3 providing further guidance on how planning authorities can enable low cost home ownership in rural areas; through exceptions policies and specific land allocations. The further progress of these LCHO routes also requires a local housing land assembly role for community land trusts with the ability to use rural housing burdens to prevent leakage to the 2nd home market

To extend its impact, assistance from LIFT should be targeted at social tenants (freeing up more social housing) as well as people who wish to remain in their home community but cannot afford local house prices (reducing migration).

Question 7:

How could the Government stimulate more innovative mortgage and related products and services to assist people in purchasing their first home?

RHOG applicants are often restricted in the mortgages they are able to access because lenders have little information or understanding of RHOGs. Dedicated information for lenders outlining the grant process may assist in more lenders working with RHOG applicants.

Question 8:

Should the Government provide direct cash grants to first-time buyers?

We believe that any direct cash grant to first time buyers should be means tested.

Question 9:

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

The private sector should be encouraged to participate in Homestake or an alternative shared equity model. The development of these houses could be the fulfilment of the affordable housing quota on a site where LCHO is prioritised and prices agreed with the local authority.

Question 10:

What issues do you consider should be taken into account when considering the increased use of private sector lets to house low-income and homeless households?

The lack of social rented housing in rural areas means the private rented sector is a significant tenure in rural Scotland. Whilst there are some poor landlords, the sector has made great strides in recent years to improve the quality of its product and the security of tenure for its tenants. We would support the increased use of private landlords who are accredited through a national accreditation scheme. This scheme should set minimum standards for housing quality, security of tenure, housing management, and tenancy dispute resolution.

We believe that the private sector could be used to house homeless households when a leasing agreement between the local authority and landlord is in place.

Question 11:

How should we ensure an appropriate balance between safeguarding tenants' rights and encouraging the private rented sector to achieve its full potential in Scotland's overall housing market?

See Question 10.

Question 12:

Do you think there is sufficient engagement between the public sector and private landlords? If not, what else should national and local government be doing?

The promotion of rural leasing schemes and Rural Empty Property Grants by Rural Housing Enablers would assist the increased engagement of private landlords and estates in helping deliver affordable rural housing.

Question 13:

What other options should we consider for increasing the supply of private rented housing for low income and homeless households?

We support the use of rural leasing schemes to deliver affordable housing for low income and homeless households. These schemes enable the local authority to increase the housing they can offer in small communities. This helps those in housing need to remain in their home community or island to be housed, rather than having to move away to larger settlements. This has the beneficial effect of helping stem migration and helping sustain local schools and other services.

Question 14:**How could more private landlords be encouraged to let to tenants on benefits and homeless households?**

We support the extension of Rent Deposit Guarantee Schemes as a route to encouraging landlords to let to tenants

Question 15:**What other schemes or incentives might help us to recycle empty properties more effectively?**

We welcome the support for the use of Rural Empty Properties Grant and Lead Tenancy projects. Our Rural Housing Enabler in Aberdeenshire has worked with estates across the county to promote the use of Rural Empty Properties Grant and deliver affordable rented housing.

The roll out of Rural Housing Enablers across rural Scotland would significantly expand the opportunities for the reuse of empty properties to meet housing need.

The REPG process should also be simplified to encourage a range of owners of empty property to engage with the grant scheme.

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

The impact of the Right to Buy has been felt most acutely in rural communities, in some villages all of the council housing has been sold. Housing associations with Right to Buy tenancies are running to standstill; the new housing they are building is just replacing stock which has been sold off, not increasing the supply of affordable rented housing.

Land, planning and infrastructure constraints mean that new housing can often not be built in those small communities where Right to Buy has decimated the stock. And in rural areas Right to Buy houses are more likely to leak out of the local low cost home ownership market.⁴

The extension of the Right to Buy to housing associations has been a strong disincentive to landowners to release land for affordable housing which could be sold off in later years. Pressured area status has been of limited assurance as it is time limited and not universally applied: our experience has been that some local authorities have not applied for this designation despite the presence of severe pressure on local housing markets.

We therefore strongly welcome the proposal to end the Right to Buy for new social housing as it will help to free up land for housing from landowners. However it will have limited effect in increasing the supply of social housing; as new tenancies in existing council housing will still have the Right to Buy and tenants of non charitable housing associations will acquire the Right to Buy their homes in 2012. Albeit this could be suspended through pressured area status being granted.

⁴ The Right To Buy In Scotland – Pulling Together The Evidence. The Scottish Government 2006 p.50

We believe that only through the abolition of the Modernised Right to Buy will the stock of affordable rural housing in Scotland begin to grow. This measure should be accompanied by the targeting of LIFT to enable those who wish to enter home ownership to do so.

Question 17:

Do you agree that we should subsidise local authorities in areas of need to use their prudential borrowing capacity to build new council houses?

We support enabling local authorities to build new council houses. However do not believe this should be restricted to those able to use prudential borrowing capacity as some council's with the greatest housing need have limited capacity to use this measure. We believe that any subsidy should be targeted to those areas of need, regardless of the ability to raise prudential borrowing.

Question 18:

Do you agree that we should introduce large-scale competitions for subsidy?

We have concerns regarding the implications of the introduction of large scale competitions for rural housing development. Rural development particularly in small rural communities can be expensive; with greater costs associated with transport, contractor subsistence, lower economies of scale, and reduced contractor competition.

Currently housing associations find small remote developments difficult to undertake on existing grant levels, these developments will become even more difficult with lower rates of grant. Also we are concerned that large developers and amalgamated housing associations will be more remote from rural communities in their governance, management and location. Their housing needs will become even more invisible with development increasingly concentrated in large towns and urban settlements. Planning and infrastructure difficulties outwith these sized settlements will compound this trend.

In this climate the role of the Local Housing Strategy in setting out the priorities for strategic housing investment becomes even more important and the ability of the LHS to adequately reflect and report rural housing needs is paramount. To do this LHS and SHIP development has to include analysis of rural housing needs, through a specific programme of micro housing needs analysis such as that possible through the work of the Rural Housing Enabler.

There is a role for the Scottish Government Communities Department and Rural Affairs Department to provide a "specialist national function" to ensure that local authority LHS and SHIP proposals are adequately rural proofed through supporting the roll out of Rural Housing Enablers.

The invitation to tender for work provided to the developers has to include guidance on the location required for houses as well as the number and mix of affordable housing.

Question 19:

If not, how would you ensure that public subsidy is used to build as many good quality RSL houses as possible?

See above

Question 20:**Do you agree that we should subsidise the development of houses for mid-market rent?**

The priority need for development in rural Scotland is social rented housing. Average incomes are such that for most of those in housing need this is the only viable tenure. The provision of social housing is at much lower rates in rural areas and the residualisation which characterises urban social housing is absent from most rural areas. Therefore the need to use mid-market rent housing to create tenure diversity is less pronounced in rural areas.

We believe that the development of mid market rented housing will have an adverse impact on the provision of social rented housing, through a reduction in funding available for social housing as funds are redirected to this tenure and through the use of scarce housing land where social housing might have been developed. We therefore do not support the use of subsidy to promote mid market renting.

Question 21:**If so, should the subsidy be awarded as part of the competitive regime for awarding HAG that we are proposing?**

See above

Question 22:**If not, how would you increase variety in social housing?**

The proposals for Rural Empty Property Grants, rural leasing schemes, and alternative affordable housing providers have the potential to diversify the type, location and landlords available in the provision of affordable rural housing. However this can only be realised if there is support to advise and promote this diversity. Rural Housing Enablers are key to unlocking the potential for the different routes to the provision of affordable rural housing.

Question 23:**Do you agree that we should encourage landlords to look at means of adjusting the mix of their stock in the interests of achieving more sustainable mixed communities?**

The goal of creating sustainable mixed communities is not solely achieved by the adjustment of social landlords existing stock. In rural Scotland it is vital for the creation of sustainable communities that measures are implemented to enable the development of more social housing stock. In many rural communities owner occupation is the mono tenure and high prices mean those on low incomes are increasingly unable to make their homes in rural Scotland. The leakage of RTB council housing out of the low cost home ownership market has compounded this problem.

To create more sustainable rural communities local authority planning departments have to become more creative at delivering affordable housing; using powers to allocate land specifically for affordable housing; permitting exceptional development of affordable housing on the edge of villages where need is demonstrated; and penalising landowners/developers who refuse to release land for this type of development. Equally measures are needed to engage the community in understanding the requirement for affordable housing, through housing needs surveys by Rural Housing Enablers.

Rural Housing Enablers play a key role in helping to demonstrate local housing need which is the catalyst for the granting of permission for an exceptions site, and also engaging with the local community to ensure their participation and support for development. In England where the use Exceptions Policies is widespread, planning permission under exceptions rules is for housing to meet the needs of the people in the community where the site is.

Therefore the houses have to be allocated to the people in housing need highlighted by the housing survey. This helps gain community support and approval for these projects as local people can be assured that the houses are meeting housing need in their own community.

It cannot make any sense for the sustainability of our rural communities that new social housing built to meet local needs, prevent migration, help support families can be allocated to households with no local connection. Rural social housing is a scarce resource and needs to be targeted to those households in housing need who have a local connection to help sustain local communities and services.

We propose the development of housing allocation policies which permit RSLs and local authorities to support a wider rural development and sustainability agenda in the allocation of their houses in small, remote and island communities. Community lettings policies are also crucial to the encouragement of land release by landowners and support for housing development by communities.

Question 24:

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

We support rural communities who want to take action on local housing problems and who have the ability and energy to deliver community owned and controlled housing, Some of these communities have taken ownership of land and housing through the land reform legislation and we would like to see community trusts supported by grants to build and renovate housing in their communities. The development of housing would provide a sustainable income stream for these small social enterprises: an income stream which can help them to deliver other community benefits. Community trusts receiving subsidy to build housing will have to demonstrate that they have the capacity to take on the development and management of housing projects, or have built links with local housing associations to contract development and management services.

This kind of development may also be possible at lower grant rates as land does not need to be bought by a different housing developer. It also has the potential to make allocations more local and responsive to community needs. Additionally the funding would help deliver a greater diversity of providers of affordable rural housing to increase the supply – particularly in small rural communities.

We support the extension of subsidy to private landowners as this will help to increase and diversify the supply of rural housing particularly in small communities, Subsidy should be dependent on the landowner entering a landlord accreditation scheme. Landowners should also be encouraged to engage with Rural Housing Enablers to enable the development of empty properties and release of plots for RHOGs.

Question 25:

What sorts of protections should be offered to tenants in these circumstances?

The protections offered to tenants of housing built through this subsidy should be consistent with those offered to tenants of RSLs.

Question 26:

Do you think that the Scottish Government should vary Right to Buy discounts by (a) locality and/ or (b) type of property?

See our answer to Q16. We believe that the Modernised Right to Buy should be abolished.

Question 27:

Do you agree that ALMOs can provide a satisfactory alternative to stock transfers?

We support the development of ALMO's where these are community or tenant based.

Question 28:

Do you think that additional help from Government to enable landlords to meet the SHQS should be linked to improvements in a landlord's performance?

Yes but measurement of performance has to accept the potential impact of geography on the quality and cost of housing management services and on the condition of properties and their maintenance costs. Additional support should also be available to help housing associations tackle the deficiencies of non standard buildings.

Question 29:

If so, what measures do you think would be beneficial? If not, why not?

Energy efficiency measures would financially benefit tenants, but tenants should not lose out because of landlord's shortcomings on performance.

Question 30:

Do you agree that we need to find new ways of focussing on the quality of place/open space and greenspace within deprived neighbourhoods?

We consider that the provision of green and community spaces is an important issue for rural communities as well as in urban Scotland. They provide a place for people to come together and community activity. We would like to see support extended to rural areas and funds made available to provide community space in our villages and dispersed communities.

Question 31:

Do you have suggestions for approaches that are not resource intensive and that include stakeholders?

No comment

Question 32:

Do you agree that the lead role (and recipient of any resources) to undertake this work should be open to a range of stakeholders?

We would propose that the community should take a lead role in undertaking this work through a community trust, community council or alternative.

Question 33:

Do you agree with the features and principles we have set out here for a modernised regulation framework?

We agree that there should be a lighter touch in the regulation of housing associations, and a reduction in the bureaucracy which surrounds them.

Question 34:

How would you like social housing regulation to be organised? (For example, should it be a separate organisation or part of a group of other regulators?)

No comment

This email has been received from an external party and
has been swept for the presence of computer viruses.

The Rural Housing Service supports rural communities to develop solutions to their housing needs.
We believe that affordable housing is crucial to sustaining and developing our rural communities.
We strive to give a voice to people who are excluded, and to empower communities to control their housing choices.

The Rural Housing Service is a Scottish Charity SC 031239