

Appendix 2 – Verbatim comments on Housing Supplementary Guidance and Responses

S Simmers (63)

We seek the same positive statement in the Draft Buchanan South RDFA which has a general resistance in the Estate for such Sub-Division, which is inconsistent with the Housing Guidance and is subject of a separate objection. We support the recognition on page 20 that the Sub-Division of garden ground can be appropriate and note the links to the Draft Design Guidance on this Issue, again, which we support. (Buchanan Castle Estate.)

Response: *The text on sub-division of plots has been moved from page 20 into the section on infill housing in towns and villages. It was not felt that the specific locational guidance for Buchanan Castle Estate relating to sub-division was relevant within this guidance. No modification as made.*

Geddes Consulting for Stuart and Val Gray (693)

On page 16, the guidance outlines the commuted sum requirements. The methodology used to derive these figures requires further clarification. In most cases, the commuted sum per unit requirement is **equal to or more than the open market value of a plot for private sale**. Clearly, the level of commuted sum payment being sought is not financially viable. Furthermore, appendix 1 requires to be updated to ensure that the provision of low cost entry level housing for sale and self build homes can be supported in accord with SPP paragraph 126. Low cost homes for sale can be described as housing with a gross area of no more than 80 square metres as provided for in other council areas.

Response: *The District valuer has provided confirmation that commuted sum values remain viable. If there are abnormal site constraints then a case can be made to reduce the commuted sum value. The commuted sum value should be added on to the sale price of the plot. Further clarification has been provided explaining the process the applicant must undertake to make a case to reduce the commuted sum. No modification was made to the commuted sum figures. Appendix 1 has been updated to refer to low cost housing for sale which is just another way of saying discounted sale.*

Scottish Land and Estates (699)

Section 3, p7 : We would like to see private rented sector recognised as a delivery method of affordable housing.

Section 4, p 8 : In the final paragraph we are concerned by the prescription of perpetuity or ten years. We feel this could be more flexible in line with the message on p18.

Section 6, p 15 : The second paragraph should be reworded. Suggested wording is: It is anticipated that a new Scottish Government funding stream may be available within the plan period. This may provide funding directly to private landowners, communities, RSLs or local authorities who are looking to develop new affordable housing for ownership or rent, or bring empty homes back into use as affordable housing in rural areas. Collaboration between groups will be particularly welcome.

Section 9, p19 : We welcome the potential exemption to a commuted sum in recognition that costs of conversions may be abnormal.

Section 11, p 22 : We would like to see the same flexibility regarding the length of time a property must be offered at an affordable rate which was stated on p 18.

Appendix 1, p26 : The PRS must be recognised as a potential delivery method for mid market rent. Many rural estates let a substantial proportion of their properties at an affordable rate (80% of Local Housing Allowance rate or less).

Appendix 1, p27 : On the second line both incidences of the phrase 'private sector' should be replaced with 'market'. Similarly, on the seventh line 'private sector' should be replaced with 'market'. We would like to see the reference to perpetuity, again, be more flexible.

Response: *The majority of the changes above have been made and any reference to mid market rent has been changed to mid market private rent. There is no intention to add flexibility to the length of time a house is to be affordable unless it is an exception and this is fully explained in the development viability section.*