



Your details

Please complete the following details below. It is essential that we have a name and the name of any organisation if you are responding on their behalf. Contact details would be helpful if we need to follow up on any points.

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Would you like us to keep your response confidential:	No

Consultation questions

Below you will find response boxes for each of our consultation questions. If possible, please base your response on answers to these questions.

Some questions may be somewhat irrelevant to your interests, in which case please feel free to answer as many or as few as you like. And please feel free to offer other comments if you think they are relevant to our remit. There is space at the end for you to do so.

You can skip to the section(s) that you wish to respond to through the links below:

1. [Wellbeing](#)
2. [Housing and investment](#)
3. [Housing and the economy](#)
4. [Housing and welfare policy](#)
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8. [The Private Rented Sector \(PRS\)](#)

Section 1: Our assessment of the importance of housing for wellbeing in Scotland

Q.1. Has our assessment of housing and wellbeing missed any important benefits and, if so, which benefits and what is the evidence for this?

Particularly in a rural context housing is vital to sustain local services, shops, schools by helping retain a diverse population. Lack of affordable housing in rural Scotland has a severe impact to the retention of local services, and in the provision of care services to rural elderly – as lack of local carers due to lack of housing. Housing is crucial to rural economic development, lack of affordable housing means difficulties recruiting and retaining staff, hindering business start up or development

Q.2. Has our assessment exaggerated any of the benefits of housing for wellbeing and, if so, in what respects and what are your reasons for saying this?

No

Section 2: Does Scotland invest enough in housing?

Q.3. Do you agree with our assessment of the current position on investment in housing?

Yes – added rural dimension is that most rural housing associations are small and cannot access cheap lending – and when added to higher cost of rural housing development has led to many rural associations scaling back their development, particularly of small developments in small communities.



Q.4. Do you agree with our brief assessment of current policy on investment in housing?

Your assessment demonstrates that we need to have some agreement of what "affordable" means. Any new definition needs to take account of fuel costs – new greener homes mean there are potential savings to tenants in heating costs – these should be partly reflected in higher rent for these properties.

Should be recognition that LCHO and intermediate rental properties can help provide options in rural Scotland where housing choice is limited. These options also help development "stack up" in locations where just social rented housing projects would be too expensive.

Most HNDA are not rigorous and underestimate need and demand in rural locations.

Q.5. Do you agree with our suggestions for further action in the area of investment in housing?

See above regarding HNDA – consistently underestimate need in rural locations – need fine grained approach to assessment in rural areas based on village housing needs assessments – see approach of Rural Housing Enablers in England and Wales and Rural Housing Scotland.

See above regarding value of various "affordable" housing options in providing choice in rural areas and in helping to cross-subsidise social housing provision. Concentration of resources on social rented housing would lead to much less "affordable" housing being built in rural Scotland – particularly in small communities. Small rural communities need housing options: social housing for rent, good quality mid market rent and support for LCHO through programmes like Rural Home Ownership Grants (These had a crucial role in helping young people make their homes in rural Scotland but were phased out in 2012 – they need to be brought back)

6. Do you have any other suggestions that we have not mentioned in relation to investment in housing?

Yes – support self build in rural Scotland. Bring back Rural Home Ownership Grants to help people on low-average incomes build; plus development finance support – loans to help get project to completion to be repaid when mortgage lending secured. Current LCHO options from Scottish Government do not work in rural areas – just 6% of OMSEP spent in rural Scotland (rural 20% population)

Encourage/support community landowners to develop housing for rent on land they own (see Ulva Ferry) and provide house plots for local people building with RHOGs



Section 3: Getting a better fit between housing and the economy

Q.7. Do you agree with our assessment of the current position regarding housing and the economy? What more would you add?

As mentioned above access to affordable housing is a key driver of rural economic development.

Access to self build mortgages has become very constrained in recent years – see above regarding provision of development loan finance to overcome this.

Q.8. Do you agree with our assessment of the current situation of UK Government policy with regards to the housing market and the economy?

Current schemes such as Help to Buy very limited in helping LCHO in rural Scotland; Rural Home Ownership Grants proven to help but not available.

Q.9. What are your views about the five areas of policy reforms suggested here?

Agree regarding CLTs (see above regarding support to community landowners to develop – see Knoydart Foundation – Rural Homes for Rent) – can deliver rented housing and land for LCHO through RHOGs.

Agree with importance of masterplanning but needs to be community led. Land assembly mechanism needs to be tied to better housing need and demand assessment, and needs to recognise housing needs of small rural communities.



Section 4: Getting a better fit between housing and welfare policy

Q.10. Do you agree with our assessment of the current position regarding housing and welfare benefits? What more would you add?

Yes

Q.11. Do you agree with our assessment of the current situation of government policy at UK levels and the possible outcomes post-referendum? What more would you add?

Yes

Q.12. What are your views about the medium term policy options presented here? What other ideas and issues strike you over this time frame?



Q.13. Do you agree that we have a unique opportunity to consider longer term policy options over the next key period in Scotland's history? How do you respond to the options proposed here? Are there other options that should be considered?

Section 5: Getting a better fit between housing and the environment

Q.14. Do you agree with our assessment of the importance of housing to the environment?

Concerned that first bullet point seeks to constrain development to locations which do not depend on car based commuting – many rural communities have inadequate bus services as well as inadequate housing. Need to rural proof this statement.

Q.15. Do you agree with our brief assessment of current policy on housing in relation to the environment?

See above

Needs to highlight fuel poverty more – almost half of households in remote rural Scotland are in fuel poverty



Q.16. Do you agree with our suggestions for further action in the area of housing and the environment?

Yes – needs to be increase in visibility of support available in rural areas. Better and clearer campaigns to encourage households which are older, in older properties, remote and in private rented sector

Q.17. Do you have other suggestions that we have not mentioned in relation to housing and the environment?

Increase support for community energy projects and link to community housing – encourage district heating systems

Section 6: Housing and Health and Education

Q.18. Do you agree with our on our assessment of the importance of housing to health and education?

Yes



Q.19. Do you agree with our brief assessment of current policy on housing and health and education?

Q.20. Do you agree with our suggestions for further action in the area of housing and health and education?

Q.21. Do you have other suggestions which we have not mentioned in relation to housing and health and education?



Section 7: Housing and Community Regeneration

Q.22. Do you agree with our on our assessment of the importance of community regeneration?

Community regeneration not limited to peripheral estates- many fragile rural locations which require this approach.

Q.23. Do you agree with our brief assessment of current policy on community regeneration?

Development Trusts/ community landowners have been crucial to rural regeneration.

Q.24. Do you agree with our suggestions for further action in the area of community regeneration?

Yes – but need to have a rural perspective too – highlight role of development trusts/land reform in promoting community regeneration.



Q.25. Do you have other suggestions which we have not mentioned in relation to community regeneration?

See above

Section 8: Do we need a more robust private rented sector?

Q.26. Do you agree with our views on the need for a more effective private rented sector which can make a greater contribution to meeting housing needs?

Yes – prs in rural Scotland more likely to be final housing destination, more likely to be long term and used by family households.

Q.27. Do you agree with our brief assessment of current policy on the private rented sector?

Yes



Q.28. Do you agree with our suggestions for further action in the private rented sector?

Yes – longer tenancies important to give security to long term tenants
Housing associations/community trusts could be trusted providers of good quality market rent housing alongside mid market and social housing.

Q.29. Do you have other suggestions which we have not mentioned in relation to the private rented sector?

No

Do you have any further comments in relation to the Commission on Housing and Wellbeing’s consultation paper?

No