

**APPENDIX B**

**CONSULTATION RESPONSES ON**

**AFFORDABLE HOUSING SUPPLEMENTARY PLANNING GUIDANCE**

Respondent	Summary of Response	Council Response
<b>Eildon Housing Association (EHA)</b>	Paragraph 2.3 – sets out a position on the operation of various Registered Social Landlords in the Borders. We are not clear as to the merit of the inclusion of this information given it could be restrictive in how the guidance is interpreted. Therefore, we would suggest that either the paragraph stops after ‘.....smaller specialist providers.’, or you adjust the next sentence to read that ‘... Eildon Housing Association are active across the Borders.’	The commentary is contextual in nature, and whilst not essential to the SPG, could be seen as useful information for the interested reader. The SG has been updated to reflect this.
	Para 2.5 – Highlights some tension that currently exists between what the policy has traditionally been seeking to address and more recent pressures placed on the social housing sector by welfare reform measures and in particular the bedroom tax. Our position on this is more in sympathy with the statement in the supplementary guidance in that it is seeking to address a long term housing market issue, rather than respond to a short term specific national policy measure. This is because smaller homes offer less flexibility in the role that they can play in local housing markets, albeit there is a role for a range of property sizes dependent on what the local need are. It would be useful to link this particular issue with the forthcoming work on reviewing the Local Housing Strategy to ensure that we develop greater clarity on these matters.	Support and comment noted.
	Para 5.4 and 5.5 – We would argue that there is merit in considering reducing the threshold at which the policy applies to less than the stated 17 units. While it is welcomed that consideration is given to the longer term management of the properties within the social rented sector, we also need to be mindful of the limited opportunities in some settlements to secure affordable	Discussion on this particular matter has taken place with Development Management, Forward Planning, Housing Strategy and the Council’s Development Negotiator. The principal point at issue is the desire of the council to encourage development particularly by its small house building sector. This remains the agreed position, noting also that there is no evidence

	<p>housing, especially affordable housing in perpetuity, at all. It is perfectly possible for Registered Social Landlords to effectively, responsibly and economically manage very small numbers of properties within a particular development, especially where the landlord has an established stock base nearby. Therefore, we would suggest that the threshold that is applied is reduced to 12 units or possibly 8 units. We recognise that there is an argument that such a threshold could serve to make a proposed development uneconomical; however, in such a circumstance there would be flexibility in how the policy is applied if the applicant were able to demonstrate the evidence.</p>	<p>of developments of this size being the subject of interest by the area's housing associations. The main reason the SPG was revised was to enable development viability by increasing the threshold to 17 units. House completions remain depressed and therefore this remains an issue to be addressed. However, this position should continue to be monitored with a view to considering future updates to the SPG.</p>
	<p>Para 5.6 – linked to our comments directly above, we would suggest that the threshold for contributions be adjusted to reflect a lower threshold for on-site provision i.e. either 2 – 11 or 2 – 7 respectively.</p>	<p>See above.</p>
	<p>Para 7.5 – Given Eildon Housing Association is recognised as the 'lead developer' for affordable housing in the Borders we would suggest that initial approaches are made through this route, rather than as explained in the document ('...the relevant RSL'). It may be that other delivery options or providers are ultimately selected, but this change would reinforce the 'lead developer' approach.</p>	<p>In the normal course it would be anticipated that Eildon HA would be the principal provider. However, the SPG requires to be generic to capture all of the potential routes to the development of affordable housing.</p>
<b>Historic Scotland</b>	<p>No comments.</p>	<p>N/A</p>
<b>Scottish Environmental Protection Agency (SEPA)</b>	<p>No comments.</p>	<p>N/A</p>