

Local Housing Strategy (LHS) 2023-2028

Formal Consultation Report

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1. INTRODUCTION

The Housing (Scotland) 2001 Act requires that local authorities consult on their Local Housing Strategies, and the statutory Equality Duty on public bodies requires the involvement, consultation and engagement of as wide a range of local residents and tenants and communities of interest as possible.

Appendix 3 summarises the wide range of engagement undertaken to ensure the draft Local Housing Strategy (LHS) 2023-2028 was developed collaboratively and reflected the views of partners, stakeholders and residents.

Following this engagement, a consultative draft of the LHS was produced which set out the draft vision for housing and housing related services, outcomes and actions for the Scottish Borders covering the period 2023-2028. A 12 week period of formal consultation on this draft document sought to ensure that local people, communities and stakeholders had the opportunity to have their say on whether the priorities identified will make a positive contribution to meeting housing need in the Scottish Borders.

This report provides an overview of the formal consultation process on the draft LHS. It summarises the approach to the formal consultation (Section 2), presents the responses received and outlines how we have considered the responses including, where relevant, how we have incorporated the responses into the final LHS (Section 3). The peer review process has been summarised (Section 4), and a copy of the consultation questions are included at the end of the report (Section 5).

2. FORMAL CONSULTATION PROCESS

The formal consultation process on the draft LHS began on 2nd May 2023 and lasted for a period of 12 weeks, closing on 21st July 2023. The draft LHS set out the proposed vision, strategic outcomes and delivery plan framework for the new Housing Strategy for the period 2023-2028. This document clearly outlined the issues affecting housing, summarised housing need and proposed a housing supply target, as well as providing other background and contextual information to ensure the purpose of the LHS was clear.

A full communications plan was developed which identified a range of engagement approaches to ensure everyone had the opportunity to engage in the consultation.

The Housing Strategy Team worked to ensure the consultation draft was widely circulated to all relevant stakeholders and households in the Scottish Borders, including “hard to reach” groups. This comprised:

- An online survey on Citizen Space with consultation questions to capture the views of all residents and organisations in the Scottish Borders
- A number of regular posts on social media during the 12 week consultation period
- A dedicated LHS consultation webpage
- A video showcasing the LHS to raise awareness – posted on the webpage and circulated on social media
- Engagement with SBC staff through internal updates (Yammer)
- Approximately 450 stakeholders were emailed
- A template was circulated to key stakeholders gathering their suggestions to include in the LHS action plan
- Presentations were given at 15 partnership meetings (3 face to face and 12 on Microsoft Teams) and feedback was collected from:
 - Community Planning Programme Board
 - Scottish Borders Health and Social Care Partnership Executive
 - Integrated Joint Board

- Borders Homeless and Health Strategic Partnership
- Home Energy Forum
- Area Partnerships (Berwickshire, Cheviot, Eildon and Teviot and Liddesdale)
- RSL tenant groups
- Borders Older Peoples Planning Partnership
- See Hear Group
- Physical Disability Group

As part of the formal consultation process the draft LHS was sent to Scottish Government officials in the More Homes Division and Policy Teams, as well as a local authority for peer review. The review process helps to ensure alignment of the LHS with Scottish Government guidance. More detail on this is provided in Section 5.

3. SUMMARY OF CONSULTATION RESPONSES

In total, 59 responses to the formal consultation were received in addition to feedback from 15 partnership meetings (totalling 74 overall responses). This section provides a summary of the key points raised in responses and outlines how we have considered the responses.

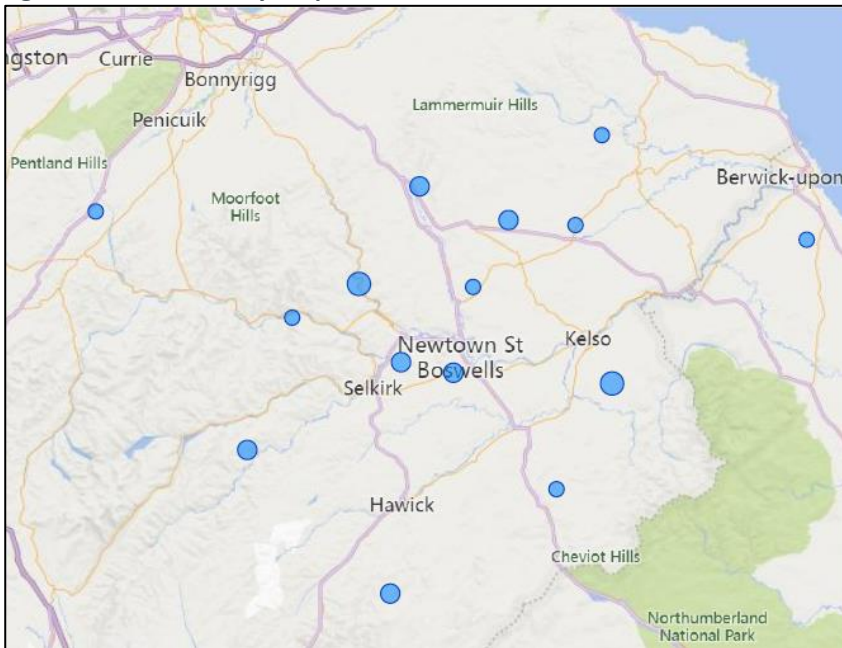
Response Type	Number
Online Survey	38
Stakeholder Template covering suggested actions	4
Email responses	17
Partnership meetings feedback	15
Total	74

3.1 Online Survey

A total of 38 responses were received to the online survey. Just over two thirds (68%) of respondents were responding as an individual, while just under one third (29%) were from an organisation. Only 3% of people did not provide an answer on whether they were an individual or from an organisation. The respondent average age was 57 years old, and there were similar numbers of female and male respondents with 29% stating they were male and 29% stating they were female. The remaining 42% provided no information on their gender.

The postcodes of survey respondents have been proportionally mapped below (see Figure 1), showing a widespread response throughout the local authority area. Only 5% of responses were from outside of the Scottish Borders.

Figure 1 – Online Survey Respondent Postcodes



A list of the organisations who submitted responses is provided below.

- Community Councils
- Registered Social Landlords (RSLs)
- NHS Borders
- South of Scotland Enterprise
- Scottish Water
- Homes for Scotland
- Developers
- MND Scotland
- Age Scotland

Key takeaways from the survey responses have been summarised:

Housing Supply Target

When asked if they agree with the proposed housing supply target, 45% of respondents agreed (16% of respondents “strongly agreed” while 29% of respondents chose “tend to agree”). 42% of respondents disagreed (18% strongly disagreed and just under a quarter of people, 24%, chose “tend to disagree”).

There were a range of comments on the housing supply target, with many people expressing contrasting views around the proportion of affordable homes:

“This area has a very low average wage level and it would be beneficial to have more affordable homes.”

“Affordable homes are what is most needed in the Borders to stem the drift away of young people/families, not attracting more commuters who are the only ones who can afford the majority of housing being built in the area.”

“There are already enough affordable homes in the Borders. There is a shortage of high quality and large property.”

“Affordable homes should be the priority.”

The Vision

A majority of respondents (82%) agreed that the vision of the LHS was clear, and a majority also agreed with this vision (42% strongly agreeing and 39% tending to agree). Comments on the vision included:

"A good vision, but it must be met."

"...it connects with our commitment to enhance people's lives and complements the commitments to home and place at a national, regional and local level."

"We strongly agree with the vision especially the delivery of more homes well designed in sustainable communities as set out in Outcome 1 of the strategy."

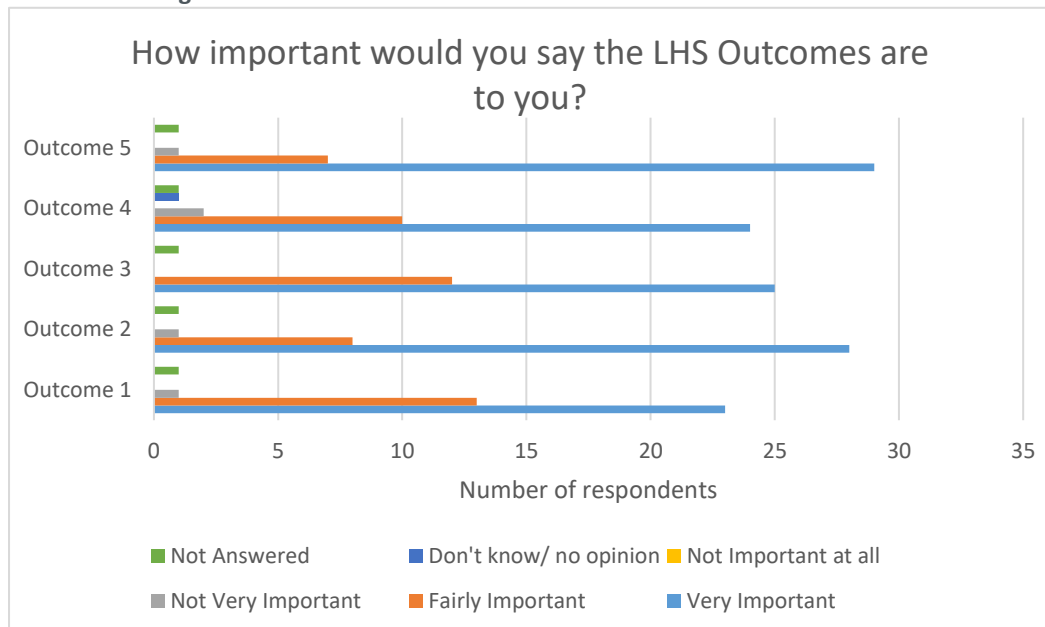
Strategic Outcomes

The Strategic Outcomes (as outlined in the draft LHS) were ranked by importance in the survey:

- Strategic Outcome 1: More homes in well designed, sustainable communities that increase opportunity for all and support our economy to thrive
- Strategic Outcome 2: People have access to homes which promote independence, health and wellbeing
- Strategic Outcome 3: Improved energy efficiency of homes and a reduction in fuel poverty while supporting a Just Transition to Net Zero through decarbonising domestic heating and energy
- Strategic Outcome 4: Communities are regenerated through improving the quality and condition of housing and the built heritage
- Strategic Outcome 5: Homelessness is prevented wherever possible and a range of housing options are provided so people can secure a suitable and sustainable housing outcome as quickly as possible

Strategic Outcome 5 was felt to be very important by the most respondents, followed by Outcome 2 (see Figure 2 below).

Figure 2: Importance of Strategic Outcomes



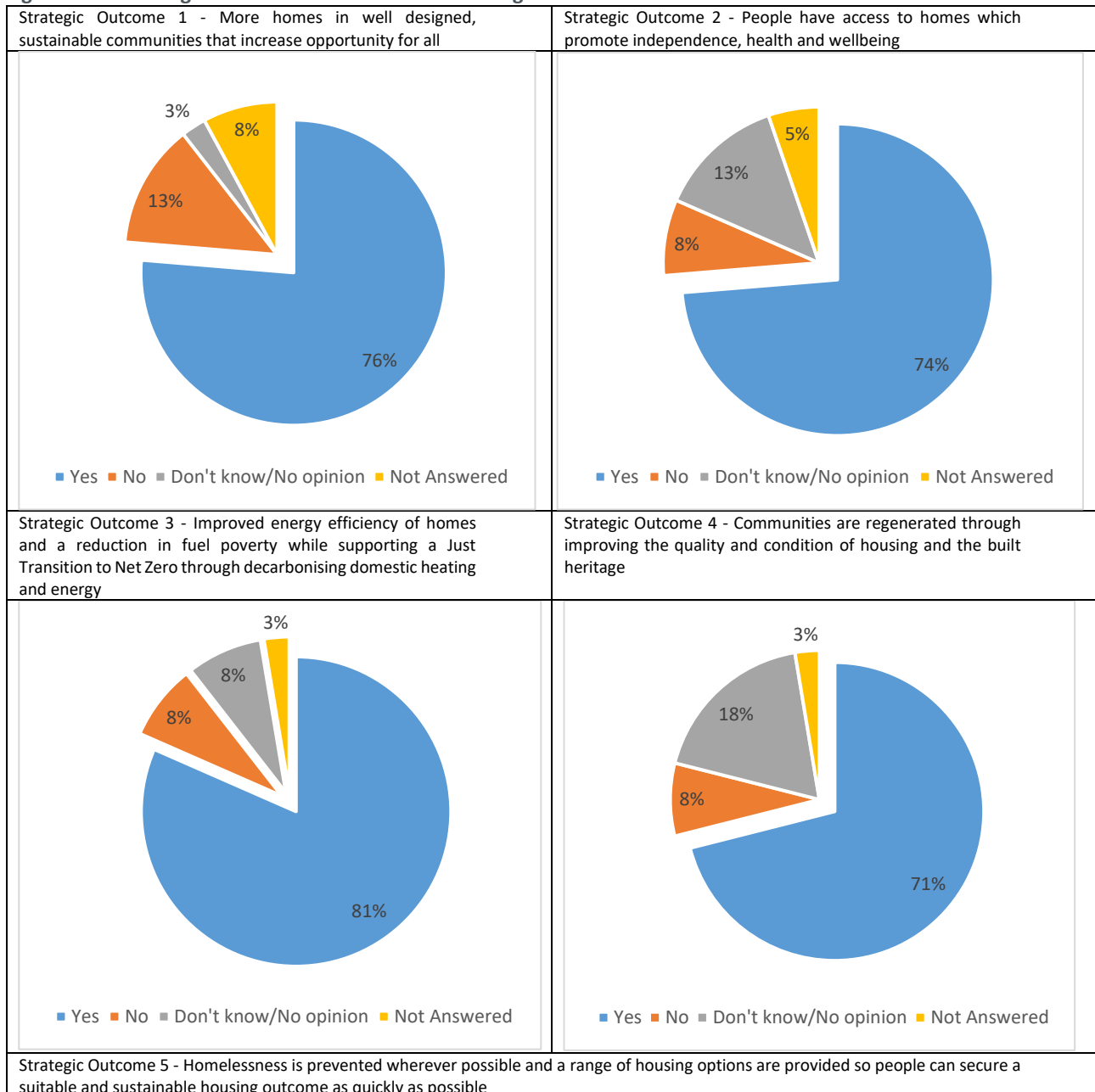
Just over half (55%) of respondents felt that the LHS Strategic Outcomes reflected the main housing problems in the Scottish Borders. A variety of other issues were put forward, including (but not limited to):

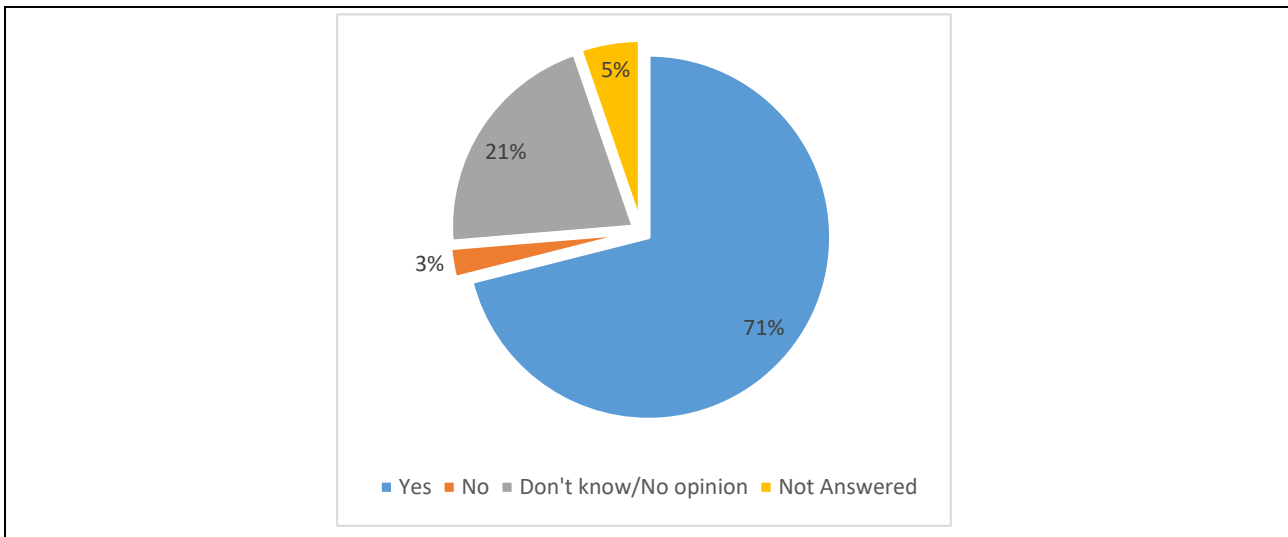
- the requirement to retrofit and increase efficiency of existing homes instead of building new homes
- the requirement for housing supply near employment hubs

- the need to bring empty homes back into use
- tackling the poor quality of private rented housing stock
- the affordability of all housing stock
- the increased requirement for accessible housing

When asked if the key actions proposed for each Strategic Outcome were the right ones, respondents tended to agree however there was variation in agreement between the outcomes. Actions under Outcome 3 were most supported and actions under Outcomes 4 and 5 were supported but to a slightly lesser extent.

Figure 3: Are the right actions listed under each Strategic Outcome?





Barriers to Delivery

When asked about the major barriers to delivering the strategic outcomes, people identified the following major barriers (more detail is provided in Section 3.2):

- Budget and resource constraints
- Construction costs
- Infrastructure constraints e.g. transport infrastructure, net zero service infrastructure
- Inadequate workforce
- Supply of willing developers
- Developer desire to build on greenfield sites
- Developer preference to build at the expensive end of the market
- Second home and holiday lets proliferating in some communities
- Quality of existing housing stock
- Skills/capacity for retrofit
- Lack of clarity between different targets e.g. EESSH2, Heat in Buildings Strategy and Net Zero
- NIMBYism and opposition to local traveller sites

Additional Actions to Deliver the LHS Vision

When asked what additional actions were needed to support delivery of the LHS vision, respondents provided the following suggestions:

- Ensure new houses are built to better space standards
- Address the issues of meeting EPC C in Scotland
- Acquire land in strategic areas for social housing
- Include the community in the planning process of managing town expansions, to ensure services can cope and there is an adequate mix of commercial and residential
- Compulsory purchase of long-term empty property in town centres
- Ensure affordable housing is spread throughout the region including rural communities so that the young and the elderly have housing opportunities in the areas where they have grown up in or spent their working lives

Action by individuals or organisations to help contribute to the LHS vision and outcomes

When asked what action they could take, respondents provided the following relevant suggestions:

- Help to produce a town action/place plan that the community has bought into.
- Help to develop “clever solutions” which could be delivered in partnership with the Integrated Joint Board - for example identifying those in fuel poverty or those who may become homeless.

- Implementing green policies in individual homes, engaging in consultations, suggesting workable and costed solutions.
- Providing assistance to project the need for adapted housing for the next 10/15 years.
- Working closely with the council and key stakeholders to get early visibility of sites and programmes to ensure support connection to the Scottish Water network and reduce any delays.
- Providing information on the requirements of the community.
- Working proactively with Scottish Borders Council, both directly and through the Regional Economic Partnership, to help address the housing challenges facing the region and in doing so to unlock and realise new economic opportunities.

3.2 Comments and Other Responses

The table below summarises comments received as part of the online survey, in addition to the comments from all other responses received via email, stakeholder templates and at meetings. It outlines the comments raised and summarises how each of these have been considered.

Table 2: Consultation Responses

Response	Comments/ Key Points	Submitted via	How the response has been considered
Stakeholder Email response	<ul style="list-style-type: none"> Support is requested to improve facilities for showpeople in the Borders. 	Email	<ul style="list-style-type: none"> The Housing Need and Demand Assessment (HNDA) did not identify any accommodation needs not being met via existing arrangements, however this is being reviewed. A new section specifically on Showpeople has been added to the LHS. We are engaging nationally to discuss the requirement for showpeople facilities and to identify funding that may be available to provide/improve facilities.
Stakeholder Email Response	<ul style="list-style-type: none"> Concern has been raised around the annual target figure for accessible wheelchair homes being too low and not being fulfilled quick enough. 	Email	<ul style="list-style-type: none"> The target for new wheelchair housing is 20 homes per annum, with 15 of those being provided by RSLs. This is based on a needs analysis and evidence. We acknowledge that more work needs to be done with private sector developers to support delivery of accessible wheelchair homes. This has been included in the LHS and action plan. We are currently also drafting a response to the Scottish Government's consultation on proposed updates to the Housing for Varying Needs guidance which will inform requirements for accessible homes.
Community Email Response	<ul style="list-style-type: none"> There is no mention of the Newtown St Boswells strategic housing site. 	Email	Apart from Lowood (Tweedbank) we have not specifically mentioned individual sites, however these sites are referenced in the Strategic Housing Investment Plan (SHIP) and the Local Development Plan (LDP).
Borders Older People's Planning Partnership	<p>This group suggested that:</p> <ul style="list-style-type: none"> Community place making should be a priority for consideration. We could utilise older buildings such as old mill buildings for housing. It is important to have access to services and transport. 	Meeting	<ul style="list-style-type: none"> SBC intends to put Place at the heart of our work and action plan, making it easier for homes to be at the heart of strong communities with housing that is well designed without compromising on the aesthetics. This is reflected in the LHS and action plan. We will work with RSLs and developers to take forward suitable projects which may involve older properties depending on ownership and use. The LHS and its actions are linked to other policies informing service and transport planning to ensure a coordinated approach. Services and transport links are also considered during the planning process and within local place plans which communities can feed into. SBC continues to promote the Place-making approach and principles, including supporting communities to develop Local Place Plans which will help influence the LHS in future.
Borders Home Energy Forum	The importance of the LHS was highlighted and a positive response to the draft LHS was noted.	Meeting	This is welcomed.
RSL Tenant Group	<ul style="list-style-type: none"> The group questioned what exactly is meant by the term affordable housing. The group asked if the vision is too ambitious. How do we ensure we have housing for local people. Often people move to the area and are able to pay more. What can be done to stop 	Meeting	<ul style="list-style-type: none"> We have added a definition of affordable housing to the main LHS document. This is taken from the Scottish Government's NPF4 which defines affordable housing as housing "of a reasonable quality that is affordable to people on low incomes. This can include social rented, mid-market rented, shared ownership, shared equity, housing sold at a discount, self-build plots and low-cost housing without subsidy." In the LHS evidence paper we have used an assumption of an affordability threshold of 25% of household income spent on rent. The proposed vision seeks a balance between ambition and realism.

Response	Comments/ Key Points	Submitted via	How the response has been considered
	<p>this? How do we build private housing and offer it only to locals?</p> <ul style="list-style-type: none"> • Can planning be streamlined for housing associations, for building and for acquiring sites? – making it easier to develop affordable housing • What money is available or going to be available for delivering net zero? Will the council be supporting housing associations? • Second homes/ short term lets. How do we stop these as more and more show up, taking housing away from being residential housing to holiday homes? 		<ul style="list-style-type: none"> • We are limited in what we can do to ensure private housing is specifically for local people, however we can work to review house price data to understand what may be affordable for local people. • The planning process is a legislative process which considers applications in the context of the local development plan for the area. Housing associations and developers are required to follow this process. • RSLs have the opportunity to bid for national funding to deliver net zero improvements. Additionally, the Local Heat and Energy Efficiency Strategy (LHEES), once developed, will inform an area-based approach to heat and energy efficiency planning and delivery, covering all building stock within the area. • We'll review short term lets data once this is available and consider options to address any significant issues that are apparent. This will be included as an additional action within the Action Plan. Data on second homes is being monitored and if any issues are identified, again this will be addressed. • The LHS highlights actions related to exploring short term let control zones, local lettings plans and opportunities to apply "burdens" to homes.
RSL Customer Voice Group	<ul style="list-style-type: none"> • Questions were raised around the definition of affordable housing. • There was concern expressed around the cost of living crisis and the impact of this on homelessness. How are we providing housing for homeless people and are they being treated as a priority? • How do we encourage more young people to stay in the Borders? E.g. having an adequate supply of one bedroom properties. The costs of living in houses also needs to be affordable. 	Meeting	<ul style="list-style-type: none"> • As per above we have added a definition of affordable housing to the LHS. • Tackling homelessness is a key priority within the LHS. RSLs treat those at risk of homelessness or who are homeless as a priority group. The Rapid Re-housing Transition Plan sets out a vision: "Homelessness is prevented wherever possible but where homelessness cannot be prevented a settled, mainstream housing outcome is secured as quickly as possible." The LHS Action Plan sets out steps toward this, which are also reflected in the LHS. • Providing the right homes in the right place for people (including young people) is also a key consideration which the LHS and which the action plan seeks to address. More detail and actions are outlined in the LHS.
See Hear Meeting	<ul style="list-style-type: none"> • There was discussion around how housing could be improved for those with hearing and sight loss, and the requirement to prioritise housing for disabled people was raised. • There are certain changes that can be made to improve homes for visually impaired residents, e.g. changing facing colours (toilet seat different colour) etc (not white on white); railings inside and outside the home; outside lights; doorbells which identify who is there. 	Meeting	<ul style="list-style-type: none"> • We are currently drafting a response to the Scottish Government's consultation on proposed updates to the Housing for Varying Needs guidance, which discusses requirements for housing to suit those with varying needs including hearing and sight loss. This will inform better design in houses for people with specific needs. • RSLs have priority groups which include people requiring wheelchair or specially adapted housing. • Homeowners and RSLs are responsible for making changes to homes, and grants are available: https://www.scotborders.gov.uk/info/20011/housing_and_homeless/369/adaptations/2

Response	Comments/ Key Points	Submitted via	How the response has been considered
	<p>Who is responsible for making these changes and are there grants available?</p> <ul style="list-style-type: none"> OTs could be engaged with at the beginning of new housing developments. 		<ul style="list-style-type: none"> RSLs typically engage with users and subject matter experts including OTs at the design stage prior to construction, meaning that OT's and others may have the option to engage at the start of new housing developments.
Physical Disability Strategy Group	<ul style="list-style-type: none"> There is a long waiting list for adaptations in homes. How can we make private housing more accessible when being built? How can we make existing homes more accessible, not only for people with disabilities? How can we best utilise empty homes? 	Meeting	<ul style="list-style-type: none"> We know Covid-19 has impacted the waiting time for adaptations and this is still affecting waiting times due to the build up in demand. The availability of trades also impacts this. We have also included an action within the LHS Action Plan to review the Scheme of Assistance ensuring the new Guidance on the Provision of Equipment and Adaptations is reflected. We have a target for accessible homes, some of which will be delivered by the private sector. We will engage with private developers and self-build owners to encourage more accessible elements. We will also feed into the updates to the Housing For Varying Needs guidance which will inform requirements for accessible homes. The Scottish Government's Housing to 2040 sets out actions to improve accessibility, affordability and standards across the whole rented sector. This, alongside new building standards from 2025/26 to underpin the new Scottish Accessible Homes Standard and future-proof new homes for lifelong accessibility, will contribute to improved accessibility in the private sector. Our designated Empty Homes officer is working with property owners to make empty homes habitable again through providing advice and support and administering the Empty Homes grant.
Area Partnerships	<ul style="list-style-type: none"> Is there a better term than "affordable housing" which does not have as much stigma attached to it? Why is the term market housing used? How does the LHS tie in with community led housing? How does this link in to planning and other policies? How is the LHS delivered and how is it operational? 	Meeting	<ul style="list-style-type: none"> We are working to tackle the stigma associated with the term "affordable" housing, we acknowledge the issue and will work with partners to address negative perceptions. The term market housing is used to ensure consistent terminology across policy and strategic documents. The LHS is linked in with Place Plans and Place Making which includes community-led development, as well as the LDP, other planning documents and relevant policies. Section 2 of the Evidence Paper Appendix 2 provides more detail on this. Housing issues have been identified in the SBC Community Plan and Locality Plans and these have been discussed in the LHS. The LHS Action Plan provides detail on specific actions to address issues discussed, naming which partner is responsible for delivery, and a monitoring tool is used to report on actions annually. The LHS is a partnership document delivered by a range of partners.
Integrated Joint Board (IJB)	<ul style="list-style-type: none"> Positive response to the draft LHS Need to add Physical Disability Strategy to the IIA appendix Are office spaces in homes being considered? How do we ensure we retain our working age population and ensure there are opportunities for this demographic? 	Meeting	<ul style="list-style-type: none"> There is now reference to the Physical Disability Strategy in the IIA Appendix. Changing housing need is monitored, and that includes the requirement for office spaces. RSLs are increasingly including an additional room for office use. Providing the right homes in the right place for people (including the working age population) is also a key consideration which the LHS and action plan seeks to address. The LHS and its actions are linked to other policies informing service and transport planning to ensure a coordinated approach.

Response	Comments/ Key Points	Submitted via	How the response has been considered
	<ul style="list-style-type: none"> • Is the LHS linked with Transport Strategies? • Is Place making considered when new homes are being planned? • Is modular housing being considered? 		<ul style="list-style-type: none"> • SBC intends to put Place at the heart of our work and action plans, making it easier for homes to be at the heart of strong communities with housing that is well designed without compromising on the aesthetics. • Modular housing is being considered as well as other modern methods of construction.
SBC Learning Disability Service	<ul style="list-style-type: none"> • Coming Home Programme – there is a need for robust, accessible accommodation / homes for 17 people. There are currently 4 placements in 2 properties confirmed. Soon to be looking for accommodation for 3 people with very complex support needs. An additional project is still trying to source land and accommodation for up to 8 people. • There will be future demand from young people coming up from Children Services with increased physical support needs. • Some accommodation is not fit for purpose going into people's later years. How do people access more level access accommodation? • Need ability for technology to be retro fitted or built in from the start for new builds. Links to future proofing of accommodation. • Need for appropriate dementia friendly accommodation for people with Down Syndrome and dementia who are generally younger than traditional cohort of people in generic Care Home settings. • Is there scope for building opportunities to enable young people to practice skills for independence? • Financial Inclusion Team - there is a need for enough resource to support individuals. • Consideration of modular building - for quicker access to and quick future adaptations/add-ons. 	Email	<ul style="list-style-type: none"> • We will update the Coming Home Section of the LHS to include the most recent data • Actions outlined in the Integrated Strategic Plan for Older People's Housing Care and Support, the Integrated Children's and Young People Plan, and the Wheelchair Accessible Housing Plan include the use of technology in homes to make them liveable for older people. We will ensure these are reflected in the LHS and action plan. • The LHS seeks to address these issues and requirements listed, and the priorities have been taken forward into the action plan.

Response	Comments/ Key Points	Submitted via	How the response has been considered
South of Scotland Enterprise	<ul style="list-style-type: none"> The strategy is generally responsive to the area's needs and opportunities. The strategy would benefit from strengthened and more explicit acknowledgment of the critical dependency between housing and the economy, e.g. within the vision or foreword. The vision could be updated as follows "Everyone in the Scottish Borders has access to a home that meets their needs and is part of a sustainable community, helping our economy to thrive". The strategy could benefit from referencing a greater ambition to innovate and embrace research and new ways of potentially addressing longstanding challenges. The strategy would also benefit from stronger links between growing the region's skills base and development planning. There is scope to further emphasise Place Planning as a mechanism through which localised housing challenges can be addressed. Suggested additional action which commits to ongoing engagement with the development industry as a means of understanding barriers and opportunities in real time. Suggested additional action to better reflect the ambition to develop new and innovative solutions to retrofit. 	Email and Survey	<ul style="list-style-type: none"> When we say "homes that meet their needs" as outlined in the vision, we mean that the home is well designed, of sufficient quality, promotes independence, is energy efficient, is affordable, in the right location, and contributes to the wider area's regeneration and helps the economy to thrive. We are opting not to change the vision as acknowledging the economy may imply that this is more important than other aspects, e.g. whether the home is affordable, or whether it contributes to regeneration of the area. We will update Strategic Outcome 1 to make specific reference to the economy. "Strategic Outcome 1: More homes in well designed, sustainable communities that increase opportunity for all, helping our economy to thrive." We have updated references to the economy in the foreword and throughout the LHS we have sought to emphasise links to the economy. The Convention of the South of Scotland, a forum composed of all public sector partners and Scottish Government, seeks to ensure effective public sector partnership working and delivery, assessing and planning for existing and future challenges, and driving inclusive growth and regional priorities. In February 2023 the forum focused its discussion on the housing challenges and opportunities across the South of Scotland. Following this the South of Scotland Regional Economic Partnership (REP) established a housing subgroup to consider and explore in more detail constraints to development and help identify future investment priorities and opportunities. Place Planning is a key action but we will ensure this is referenced and emphasised throughout. We have made added the additional actions suggested to the LHS Action Plan.
RSL Email response	<p>General</p> <ul style="list-style-type: none"> The introductory section could further emphasise the whole system focus of the strategy. The economic impact/significance of the housing sector could be further emphasised, both as a contextual fact and also as a 	Email	<ul style="list-style-type: none"> We have emphasised the whole system focus of housing within the introduction. We will update Strategic Outcome 1 to make specific reference to the economy. "Strategic Outcome 1: More homes in well designed, sustainable communities that increase opportunity for all, <u>helping our economy to thrive.</u>" We have updated references to the economy in the foreword and throughout the LHS and Action Plan we have sought to emphasise links to the economy.

Response	Comments/ Key Points	Submitted via	How the response has been considered
	<p>reminder of the opportunities arising from the delivery of the strategy.</p> <ul style="list-style-type: none"> • The Private Rented Sector issues and references need to be strengthened across the strategy, both in terms of its historic and current role as well as the likely future direction of this tenure. • We think it would be helpful to make specific reference to the Public Health discipline and linkages with respect to the consideration of health and social care issues – also at page 17. • In terms of the ‘key indicators’ list at 1.4 – we think some further refinement and clarification is needed. For example, we all need to be clear what we mean by ‘retrofit’. • We recognise the significant achievements listed under priority 4 on page 11. However, we suggest there is current work needed to revise and refresh the ‘older peoples’, ‘young peoples’ and ‘wheelchair housing’ plans. • Following on from the most recent meeting of the Convention of the South of Scotland, a collaborative piece of work has been requested by the (then) Deputy First Minister to explore actions to increase the supply of housing across the region. Given the potential importance of this work, it would be logical to make specific reference to this. • Key worker issue – we support efforts to explore and understand this issue and also test creative solutions to address the challenges faced. However, we need to think very carefully about definitions, terminology and clarity of objectives in the complex and challenging area. 		<ul style="list-style-type: none"> • We have revisited the Private Rented Sector section and added narrative on the future of the tenure based on the evidence available, specifically the Private Landlord Survey section. • Working with partners in public health a health inequalities impact assessment has been undertaken on the LHS. • Key indicators will be revised and supporting narrative provided. • The achievements listed are highlights from the previous LHS. The plans will be refreshed, particularly young peoples and older peoples plans, while the actions for the wheelchair housing plans will be a part of the LHS already. • We will include reference to the commitment made by partners at the Convention of the South of Scotland to work together to help address housing challenges in the region. This will be included in the main LHS and Action Plan. • We acknowledge the issues associated with defining a key worker, and that this definition changes over time. For the LHS we have used the Scottish Government definition: “A ‘key worker’ should be defined as a public sector employee who provides an essential service. (As well as workers in the public sector... this definition could also apply to low paid employees in the private sector/ service industries who are also providing essential services.”

Response	Comments/ Key Points	Submitted via	How the response has been considered
	<p>Housing Delivery and Sustainable Communities</p> <ul style="list-style-type: none"> The publication of the Remote Rural and Islands Action Plan has been delayed. However, we understand this is imminent and we would welcome the opportunity to jointly consider the Scottish Borders response to this and feed these ideas into the finalised LHS, timescales permitting. We recognise the plurality of responses and contributions required to address the various issues facing the housing market in the Scottish Borders. However, we feel it is important to map onto this the scale and impact of various interventions to give a sense of what actions will make the biggest difference to the stated objectives of the strategy. Within this context, the ASHP is by far and away the biggest single contribution. It is important this is not ‘crowded out’ in any way. We welcome the consideration of current tender price issues on page 33. This is a major constraint currently and the current trends are that these costs are still escalating. We all understand that these dynamics are cyclical, so we need to trade off the short, medium and longer term consequences of this dynamic. <p>Specialist Housing, Particular Needs and Independent Living</p> <ul style="list-style-type: none"> We appreciate the significant section devoted to the operation of the Care & Repair service. Whilst this sets out the valuable contribution that this service, delivered by Eildon in partnership with SBC, delivers, it also highlights the massive potential for low cost/high impact expansion of this model (including innovative 		<ul style="list-style-type: none"> We will include reference to the ASHP and spend in the key indicators section list at 1.4. We will note the offer to expand out the “one stop shop” opportunity within the LHS Action Plan and have included an action to work with C&R to undertake a strategic review of the service.

Response	Comments/ Key Points	Submitted via	How the response has been considered
	<p>new approaches on issues like dementia and use of technology) that we strongly believe we should focus on in the next few years. It should also be noted that we have offered to expand out the ‘one stop shop’ opportunity on adaptations to the other RSLs operating in the Borders and we hope to progress these discussions shortly.</p> <ul style="list-style-type: none"> • Whilst we acknowledge that the Borders is currently behind and has much more to do with respect to TEC deployment and the benefits this accrues, especially to rural areas, we do think this section underestimates the current use of TEC in supported housing services. • We think it would be wiser to be more circumspect with respect to the specifics of the proposed care villages given the current negotiations and operating environment. • Whilst there has been substantial progress against major aspects of the ‘Older Peoples’ strategy such as the Extra Care Housing Program, we need to acknowledge that progress across other areas is still an issue e.g., those supported developments recognised as not being fit for purpose. <p>Delivery</p> <ul style="list-style-type: none"> • With respect to resources, we would encourage a rewording of the term ‘private sector borrowing’ when referencing RSL financial contributions to newbuild provision. The reality is that this is majority borrowing (from a range of sources) that RSLs undertake in order to invest in future social infrastructure to deliver against this strategy – the term private sector is potentially misleading. 		<ul style="list-style-type: none"> • We have add detail on the current use of TEC including telecare and an additional monitoring PI. • We will revisit the section on care villages and update wording. • We will add detail on the progress required across other areas within the “Older Peoples” strategy within the LHS and Action Plan. • We will update the wording used, instead of “private sector borrowing” we will use “RSL borrowing”.

Response	Comments/ Key Points	Submitted via	How the response has been considered
	<ul style="list-style-type: none"> We would suggest the Bridge Homes acquisition by Eildon (supported by SG grant) should be referenced as an innovative measure with respect to the narrative set out at the top of page 89. 		<ul style="list-style-type: none"> We will add in this reference to the Bridge Homes acquisition.
Survey responses	<ul style="list-style-type: none"> We could focus more explicitly on the link between housing and the economy. Emphasising the need to provide an adequate supply of housing to bring people in to meet employment demand and encourage economic growth. What does “affordable housing” mean specifically? Questions around relationship between MATHLR and HST. Questions about annual wheelchair accessible housing figure and SHIP potential wheelchair accessible homes figure, how these relate to each other and the housing supply target. Perceived under delivery of all tenure new homes and overestimation of future delivery by the Housing Land Audit. There is a need to consider the available services and transport links when setting the targets for housing delivery. This is regarded as a constraining factor affecting communities when services and infrastructure struggle to 	Survey	<ul style="list-style-type: none"> We will update Strategic Outcome 1 to make specific reference to the economy. “Strategic Outcome 1: More homes in well designed, sustainable communities that increase opportunity for all, helping our economy to thrive.” We have updated references to the economy in the foreword and throughout the LHS we have sought to emphasise links to the economy. <p>As per above we have added a definition of affordable housing to the LHS.</p> <p>This is fully explained in Appendix 4.</p> <p>The target of 20 annual wheelchair accessible houses in the LHS is the same target in the SHIP. This is set against the housing supply target of 353 homes, meaning the wheelchair accessible homes proportion of the full annual target is 5.7%. The 20 homes for affordable wheelchair homes target is split into 15 affordable houses and 5 market housing.</p> <p>The Housing Supply Target exceeds the HNDA figure, while the 10 year proposed MATHLR is a higher figure. These are robust figures that have been set using a methodology in line with Scottish Government Guidance. The MATHLR was updated to reflect local specific factors. The figures will be kept under review. This is a target not a cap.</p> <p>SBC is currently slightly behind in the Housing Land Audit process, with the most recent Housing Land Audit (HLA) being the audit for 2021. Some of the comments raised have been addressed as part of the Housing Hearing for the Proposed Local Development Plan (May 2023). The programming of sites within the HLA continues to be a reasonable expression of what can be developed within the given time periods and there is a significant degree of uncertainty beyond years 2 and 3. Moving forward, in light of NPF4, the Scottish Government is reviewing the HLA process and Guidance.</p> <p>The LHS will be delivered in the context of relevant transport and infrastructure plans and close collaboration with partners to ensure sustainable communities.</p> <p>Specific actions in the LHS include:</p>

Response	Comments/ Key Points	Submitted via	How the response has been considered
	<p>accommodate new residents in addition to the existing residents.</p>		<ul style="list-style-type: none"> • Implement revised planning policy and practice to ensure it is directive in shaping existing and new places • Support the delivery of housing regeneration in communities (including town centres and rural settlements) • Support the development and implementation of Place Plans
	<p>Major barriers preventing delivery of Strategic Outcome 1 are:</p> <ul style="list-style-type: none"> • Budget and resource constraints • Available land for private development • Supply of willing developers • Construction costs • Cost of buying/renting vs income levels • Net zero service infrastructure • Supply chain • Complexities of mixed tenures • Developer desire to build on greenfield sites • Developer preference to build at the expensive end of the market • Second home and holiday lets proliferating in some communities 		<p>These issues will be considered in the main LHS and action plan.</p>
	<p>Major barriers preventing delivery of Strategic Outcome 2 are:</p> <ul style="list-style-type: none"> • Transport infrastructure • Budgets • Workforce • NIMBYism and opposition to local traveller sites • For wheelchair and smaller homes, the costs can be disproportionate and the flexibility of the grant regime to support this will be essential if targets are to be met • Retrofitting adaptations can be costly and restrictive – moving towards more pro-active programmes of investment in current homes could mitigate this 		<p>These issues will be considered in the main LHS and action plan.</p>

Response	Comments/ Key Points	Submitted via	How the response has been considered
	<ul style="list-style-type: none"> Stigma around complex needs or negative perceptions can result in significant community resistance to delivering housing solutions Fuel poverty for older people 		
	<p>Major barriers preventing delivery of Strategic Outcome 3 are:</p> <ul style="list-style-type: none"> Budgets Quality of existing housing stock Skills/capacity for retrofit Supply chain Lack of clarity between different targets e.g. EESSH2, Heat in Buildings Strategy and Net Zero 		<p>More clarity and detail on carbon reduction targets will be provided in the upcoming Local Heat and Energy Efficiency Strategy when it is published and as it develops. This Strategy will outline an approach which takes into account every building in the Scottish Borders, with two main aims:</p> <ul style="list-style-type: none"> To decarbonise energy The electrification of heat <p>When SBC has more information on minimum energy efficiency standards this will be communicated and made available.</p> <p>Scottish Government has been asked for clarity on what the objective of achieving “net-zero” specifically entails.</p> <p>Other issues will be considered in the main LHS and action plan.</p>
	<p>Major barriers preventing delivery of Strategic Outcome 4 are:</p> <ul style="list-style-type: none"> Budgets Capacity in the sector (people) 		<p>These issues will be considered in the main LHS and action plan.</p>
	<p>Major barriers preventing delivery of Strategic Outcome 5 are:</p> <ul style="list-style-type: none"> Budgets Lack of suitable housing 		<p>These issues will be considered in the main LHS and action plan.</p>
	<ul style="list-style-type: none"> There is a need to focus on existing buildings to retrofit rather than just delivering new build homes. 		<p>This is addressed within the LHS with references to retrofit objectives throughout.</p>
	<ul style="list-style-type: none"> Request for SBC to regulate (through building control and planning) all new builds to ensure they incorporate green energy and are adequately insulated. Redefine minimum standards. 		<p>SBC regulates all new builds through building standards and planning processes to ensure national standards are adhered to. This ensures new buildings are energy efficient regarding their heating, ventilation, lighting, etc.</p> <p>All approvals for new builds in future will have to meet minimum energy efficiency standards as introduced by Scottish Government’s Heat in building strategy.</p>

4. PEER REVIEW

The draft LHS was shared with Scottish Government officials in the More Homes division and Policy Teams, in addition to another local authority in May 2023 to go through the peer review process. The feedback recognised the strengths of the draft LHS and noted some areas for consideration. A summary of the feedback is provided below.

Areas of Strength

- **Requirements, Essential Links and Outcomes:**
The LHS provides a good summary of progress against outcomes, building on achievements from the LHS 2017-2022. It also provides good evidence of consultation and engagement and the development of outcomes, with the process clearly described. We particularly welcome the rural proofing exercise that has been carried out as part of the development of the LHS.
- **Equalities & Engagement and Consultation:**
The Consultation and Engagement undertaken by Scottish Borders Council in the development of its LHS is to be commended. There has clearly been strong engagement with communities through a range of communication methods, which has helped to inform LHS priorities and outcomes. The Consultation and Engagement Report which provides an overview of the consultation and its findings is welcomed.
- **Housing Delivery:**
The LHS demonstrates good recognition and understanding of the specific issues in delivering housing in the rural parts of Scottish Borders. The LHS also identifies strong links with the South of Scotland Enterprise and its role in promoting construction capacity, skills and supporting innovative solutions to increase housing supply. We also welcome that the LHS recognises the role of community-led housing in the area and the role that South of Scotland Community Housing plays in supporting communities to deliver more homes, and we would encourage the Council to consider how it plans to work collaboratively with South of Scotland Community Housing to support the delivery of community-led housing to meet the needs of communities.
- **Fuel Poverty, Energy Efficiency and Climate Change:**
The LHS clearly and comprehensively identifies the extent of and trends in fuel poverty, and the related challenges in eliminating fuel poverty within specific housing stock. It also clearly sets out a wide range of actions both past and present, to assist fuel poor households.

Areas for Consideration

- **Preventing and Addressing Homelessness:**
While recognising the positive approaches the Council is taking on prevention, we would suggest there should be a link to the Annual Return on the Scottish Social Housing Charter (ARC) in the homeless section, to recognise how RSL performance is measured against tenants and other customer expectations. While there is reference to Housing Options, we suggest the Council's "Housing Options Approach" is more explicitly stated.
- **House Condition:**
While recognising that Scottish Borders Council is a stock transfer authority, consideration could be given to more detail on how – as the Strategic Housing Authority – Scottish Borders Council ensures the Scottish Housing Quality Standard is met amongst its partner RSLs who have housing stock in the Scottish Borders geographic area.
- **Housing, Health and Social Care Integration:**
Consideration could be given to greater clarity being provided in the LHS on how the Council is collaborating with the Integration Authority to deliver outcomes, and which support services have been delegated to the Integration Authority.

5. CONSULTATION QUESTIONS

Within the consultation period, respondents had the opportunity to answer 19 questions by completing an online survey via Citizen Space, or alternatively sending completed forms and/or feedback via email or by post. The questions were focused on sense-checking the key priorities of the draft LHS. Answers were requested in the following formats:

- Yes/no/don't know or no opinion
- Ranking agreement with and importance of specific aspects of the LHS
- Open-ended comments sections

A copy of the questions is provided below.

LHS 2023-2028: Consultation Questions

Housing Supply Target 2023-28

Based on the SESplan Housing Need and Demand Assessment, Scottish Borders Draft Local Housing Strategy 2023-28 sets a Housing Supply Target to deliver 353 homes per annum 141 (40%) of these are to be affordable.

1. To what extent do you agree or disagree with the proposed housing supply target?

- Strongly agree
- Tend to agree
- Neither agree nor disagree
- Tend to disagree
- Strongly disagree
- Don't know/No opinion

Please share any comments on the proposed housing supply target:

The Vision

“Everyone in the Scottish Borders has access to a home that meets their needs and is part of a sustainable community”

The LHS vision needs to help us reach our ambition for housing in the Scottish Borders over the next five years.

2. Is the vision clear?

Yes

No

don't know/ No opinion

3. To what extent do you agree or disagree with the vision?

- Strongly agree
- Tend to agree
- Neither agree nor disagree
- Tend to disagree
- Strongly disagree
- Don't know/No opinion

Please share any comments on the vision:

LHS Strategic Outcomes

The Scottish Borders Draft Local Housing Strategy 2023-28 sets out five Outcomes. We want to find out how these matter to you. Please tell us how important these are to you.

4. How important or otherwise, would you say each of the LHS Outcomes are to you?

	Very Important	Fairly Important	Not Very Important	Not Important at all	Don't know/ no opinion
Strategic Outcome 1: Deliver more homes in well designed, sustainable communities that increase opportunity for all					
Strategic Outcome 2: People have access to homes which promote independence, health and wellbeing					
Strategic Outcome 3: Improved energy efficiency of homes and a reduction in fuel poverty while supporting a Just Transition to Net Zero through decarbonising domestic heating and energy					
Strategic Outcome 4: Communities are regenerated through improving the quality and condition of housing and the built heritage.					
Strategic Outcome 5: Homelessness is prevented wherever possible and a range of housing options are provided so people can secure a suitable and sustainable housing outcome as quickly as possible					

5. Do the LHS outcomes reflect the main housing problems that need to be tackled in the Scottish Borders?

- Yes
- No
- Don't know/No opinion

Please share any comments:

6. Are there any other emerging outcomes that are missing? Please specify

LHS Key Actions for Delivery

Strategic Outcome 1: Deliver more homes in well designed, sustainable communities that increase opportunity for all

Key Actions for Delivery:

- Increase the supply of affordable housing
- Deliver alternative tenure housing to meet a broad range of needs
- Increase construction capacity and skills to support delivery of more homes
- Implement revised planning policy and practice to ensure it is directive in shaping existing and new places
- Supporting the delivery of housing regeneration in communities (including town centres and rural settlements)
- Support the development and implementation of Place Plans
- Reduce the number of empty homes

7. Are the key actions proposed for LHS Strategic Outcome 1 the right ones?

Yes

No

don't know/ No opinion

If you have some suggestions for key actions, please specify:

8. Are there any major barriers that will stop us delivering LHS Strategic Outcome 1 actions? Please Specify

Strategic Outcome 2: People have access to homes which promote independence, health and wellbeing

Key Actions for Delivery:

- Work in partnership to deliver more accessible homes across tenures
- Increase the supply of wheelchair housing
- Provide information, advice and assistance on housing options and adaptations to meet particular needs across tenures
- Review the Scheme of Assistance ensuring the new Guidance on the Provision of Equipment and Adaptations is reflected
- Strengthen joint working with partners in HSCP, NHS, RSLs and others to deliver appropriate housing solutions for individuals with complex needs
- Strengthen joint working to support key worker and employer led housing opportunities
- Identify land and funding opportunities to more effectively meet the needs of the Gypsy and Gypsy Traveller community

9. Are the key actions proposed for LHS Strategic Outcome 2 the right ones?

Yes

No

don't know/ No opinion

If you have some suggestions for key actions, please specify:

10. Are there any major barriers that will stop us delivering LHS Strategic Outcome 2 actions? Please Specify

Strategic Outcome 3: Improved energy efficiency of homes and a reduction in fuel poverty while supporting a Just Transition to Net Zero through decarbonising domestic heating and energy

Key Actions for Delivery:

- Work with partners to improve energy efficiency across all tenures
- Develop the Local Heat and Energy Efficiency Strategy for the Scottish Borders
- Implement a public engagement strategy for heat in buildings
- Work with partners to develop the skills needed to deliver energy efficiency and zero emissions heating systems
- Explore wider measures to better manage energy and increase warmth in the home
- Adapt and retrofit existing homes to improve their energy efficiency

11. Are the key actions proposed for LHS Strategic Outcome 3 the right ones?

Yes

No

don't know/ No opinion

If you have some suggestions for key actions, please specify:

12. Are there any major barriers that will stop us delivering LHS Strategic Outcome 3 actions? Please

Strategic Outcome 4: Communities are regenerated through improving the quality and condition of housing and the built heritage.

Key Actions for Delivery:

- Provide holistic advice and assistance to owners/tenants to undertake house condition/energy improvement/home safety works and co-ordinate or explore funding options.
- Provide supporting and assistance to owners and landlords to meet existing and future house condition standards in private housing.
- Review the Scheme of Assistance
- Developing a Below Tolerable Standard (BTS) Housing Strategy which supports a partnership approach
- Review the Missing Share pilot

13. Are the key actions proposed for LHS Strategic Outcome 4 the right ones?

Yes

No

don't know/ No opinion

If you have some suggestions for key actions, please specify:

14. Are there any major barriers that will stop us delivering LHS Strategic Outcome 4 actions? Please

Strategic Outcome 5: Homelessness is prevented wherever possible and a range of housing options are provided so people can secure a suitable and sustainable housing outcome as quickly as possible

Key Actions for Delivery:

- Continue to Implement Rapid Rehousing
- Improve access to housing for homeless or potentially homeless households across all tenures
- People who experience homelessness reach a settled housing outcome as quickly as possible
- Ensure homeless households can access the right support at the right time
- All partners actively contribute to preventing homelessness

15. Are the actions proposed for LHS Strategic Outcome 5 the right ones?

Yes

No

don't know/ No opinion

If you have some suggestions for key actions, please specify:

16. Are there any major barriers that will stop us delivering LHS Strategic Outcome 5 actions? Please

17. Are there any specific key actions or actions which you feel will help to support the delivery of the LHS vision and strategic outcomes? Please specify

18. What key action or actions do you think you or your group / organisation can take to contribute towards meeting Scottish Borders Local Housing Strategy vision and outcomes?

Any Other Comments

19. Do you have any additional comments about the Draft Local Housing Strategy 2023-2028 that you would like to share: