



Affordable Housing Plan

Response to issues and queries raised during the community consultation

Below are the responses from the Affordable Housing Project Group to the issues, concerns and queries that came out of the community consultation on the affordable housing proposal. Many of the comments and questions were about similar issues so where appropriate we have gathered them together into a set of composite questions to avoid duplication of responses. To make it a bit easier to navigate we have arranged the questions and responses under the following headings or themes:

- Layout & Design
- The Need for Affordable Housing
- Number, type, size and tenure of houses
- Location
- Holiday and Second Homes
- Allocations and Meeting Local Priorities
- Energy Efficiency
- Miscellaneous

Theme: Layout and Design

Will the design of the houses be in keeping with the existing houses and local architectural style?

We have not yet developed detailed plans, but both RCT and Dunalastair Estate are very clear that the design of both the affordable houses and those for private sale or rent should fit in with the style of the existing houses on the street and with the village as a whole. Cost constraints are more of an issue for the affordable housing so there may need to be some compromise on the materials used.

The new houses that face on to the road are too high and will block sunlight and impact on the privacy of existing houses. They will change the character of the road from rural to urban.

As mentioned above we do not have detailed designs for the proposed new houses, but the intention is that they will be in keeping with existing properties on that street. They will be no more than 1.5 storeys high, similar to existing properties on that street.

There is already extensive residential development on that stretch of the B846 with 12 houses of various styles and designs plus a health centre and, at the east end, a large hotel.

The proposed new road and junction is a concern due to existing traffic volumes – can the existing road/junction opposite the health centre be used instead?

The design and location of the junction and access road will be subject to consultation and discussion with the Perth and Kinross Council's Transport Planning Team to ensure that it complies with their standards and guidance for road construction.

Will there be a path linking the housing development to the new Riverside Path?

Yes – the proposed layout includes a path linking the new houses to the Riverside Path.

In addition to the above there were also several detailed comments about the overall design and layout some of which were critical of its limited scope and argued for something more ambitious that also addresses retail/commercial provision or for it to be part of a wider village plan.

The main priority for RCT is to meet the need for affordable housing in Rannoch. The funding which the project depends on can only be used for this purpose. However, we accept that any development needs to be seen in the wider context of the village and the impact it has on the quality and attractiveness of the physical environment. That is why Dunalastair Estate are interested in hearing what people thought should happen to the rest of the field. Should it be the focus of future development in the village instead of the ad hoc and opportunistic pattern of development that has taken place over recent decades? Perth & Kinross Council's on-going consultation - '[The Big Place Conversation](#)' - on the new Local Development Plan provides an opportunity to discuss the wider future development of the village and is open for comment to anyone who would like to take part. (Perth & Kinross Council will be holding a Big Place Conversation drop-in session in Kinloch Rannoch Village Hall on Thursday 3rd August from 16.30 – 18.30)

Theme: The Need for Affordable Housing

The Housing Needs Analysis that provided the main evidence for the shortage of affordable housing was carried out in 2018. Can it still be relied on and are there plans to gather more up to date evidence of housing need?

We are confident in the robustness and continuing relevance of the results of the 2018 Housing Needs survey. Very little has changed since then, no new affordable housing has been built in Rannoch and there has not been a significant drop in house prices to bring them more within reach of local people on low incomes. In the consultation, 95% of responses agreed that the shortage of affordable housing is a problem and those who took part provided plenty of anecdotal evidence of the difficulties in finding secure, affordable accommodation.

We will consult further with Perth & Kinross Council's Housing Service about the waiting list for social housing in the Rannoch area as well do further research on the local housing market and the demand for rented and on owner-occupied accommodation before finalising the number of houses to be built and the types of tenure.

Theme: Number, type/size and tenure of houses

Nineteen houses are too many for this location. Why can't they be scattered across different plots?

The need for 12 affordable houses is based on the results of the independent Housing Needs Analysis carried out by the Rural Housing Scotland in 2018. The proposal for 19 houses in total, including the seven for private sale or rent, helps make the development financially feasible by enabling RCT to share the costs of infrastructure (e.g. the access road, drainage, utilities) design, planning, and procurement of a contractor, with Dunalastair Estate.

Building the affordable housing on scattered plots would probably be impractical due to a shortage of suitable sites and significantly increased costs from having several different sites rather than just one.

Why do we need the seven houses for private sale or rent?

As mentioned above developing the site in partnership with Dunalastair Estate is mutually beneficial in terms of sharing costs. The potential to develop part of the site for private housing, also makes giving up part of the field for affordable housing a more financially attractive proposition for Dunalastair Estate.

We need affordable houses for rent rather than for low-cost home ownership (LCHO).

The inclusion of affordable houses for low-cost home ownership is based on the results of the 2018 Housing Needs Survey which identified a number of people who struggling to find somewhere to live and expressed an interest in buying a house rather than renting. We have not yet decided on how many of the 12 affordable homes will be for LCHO and will need to carry out further investigation of the local housing market to assess the demand for owner-occupation. We will also need to do a detailed financial assessment to see if some sales are needed to ensure that the overall project is financially viable.

How do we ensure that the affordable houses, particularly those for low-cost home ownership), remain as affordable housing for local people?

We will be applying to the Scottish Government's Rural Housing Fund for grant funding to help pay for construction costs and it is a condition of funding that houses remain as affordable housing in perpetuity.

The affordable houses that are earmarked for low-cost home ownership will have a [Rural Housing Burden](#) attached to the title conditions. The Rural Housing Burden is made up of two elements:

- A discount of between 20%-40% on the open market value of a property;
- A right of pre-emption.

The discount makes the house affordable to people who otherwise would be unable to buy a house on the open market, while the right of pre-emption gives RCT the right to buy back the property with the same level of discount if the owner decides to sell. RCT would then sell the house to another buyer at who would benefit from the discount on the market value. RCT would only sell to buyers who meet locally agreed priorities and criteria (e.g. must have a local connection or employment, are unable to afford to buy a house on the open market). Even when RCT decide not to exercise the right of pre-emption the rural housing burden will still remain part of the title conditions in perpetuity.

In addition there would be other conditions attached to the title stipulating that the house must be used as the purchaser's permanent residence and preventing it from being let without RCT's prior agreement.

Why aren't there any one bedroomed houses?

One-bedroom properties cost as much to build as two bed houses but lack the flexibility that two bedrooms offer. For example in the case of older people or those with serious disability it offers the ability to accommodate a carer or family member. In the case of a young couple, a two bedroom allows them to stay in their home if they wish to start a family. Experience elsewhere has often been that one-bedroom properties have a high turnover and can become hard to let.

What about adapted houses for older people?

All the affordable houses will have to meet the 'Scottish Government's housing for varying needs guidance' which details standards to be followed in the design of new homes to ensure that they meet peoples changing needs as they get older. In addition the proposed plan includes two fully wheelchair accessible, single storey houses.

Theme: Location

Are there any other sites that could be used instead of this one?

RCT had originally hoped to be able to buy and use the site of the former Bunannoch Hotel and commissioned the Communities Housing Trust to carry out a feasibility study. However, the difference between the independent market valuation for the site and what the owners thought it was worth was too great and made any development unaffordable. We also approached the owners of a number of other potential sites but none were interested in selling land for affordable housing. Dunalastair Estate, the owners of the field, were the only landowner to respond positively to RCT's call for potential housing sites.

What about the risk of flooding – the field regularly experiences flooding from surface water run off after heavy rain?

We commissioned a detailed flood risk assessment which was completed in 2021. It concluded, that even taking into account climate change, there was little or no risk of flooding from either the river or surface water. The study noted that the site is sloping and has an area of low-lying ground where water can pool but that this could be mitigated through earthworks and drainage. We have commissioned a drainage plan which includes a Sustainable Urban Drainage System (SUDS) and SUDS ponds located in the low-lying area of the site, both of which will address any problems caused by climate change related increases in surface water run-off.

The drainage plan shows an overflow drain from the SUDS pond into the River Tummel – I am concerned about the impact this might have on the river and nearby properties.

There will already be a degree of surface water run-off into the River Tummel and the proposed drainage plan should if anything reduce this. Using guidance from SEPA and taking into account the possible impact of climate change the drainage plan estimates in a worse case scenario (1 in 200 year flood event) that the total drainage capacity required would be 245m³. The total storage capacity (SUDS ponds, swales, porous paving etc) in the proposed drainage plan is 381m³ so any incidents of overflows from the SUDs ponds would be very unlikely.

There are already problems with sewage capacity and the additional 19 houses will make this worse.

In our initial feasibility study for the 12 affordable houses in 2020 we consulted Scottish Water who advised there was sufficient capacity in the sewerage system. However, in the light of concerns raised in the consultation we contacted Scottish Water again with details of the updated proposal for 19 houses. They have given written confirmation that there is sufficient capacity within both the Kinloch Rannoch water treatment works and the waste water treatment works for the additional 19 houses.

Theme: Holiday & Second Homes

There are already too many second homes and holiday homes in Rannoch – what can be done to prevent the 7 houses for private sale or let being used for holiday lets or second homes?

Dunalastair Estate have listened to the community's concerns about second homes and holiday lets. It is currently Dunalastair's intention to either rent out the homes they would own on the site to those looking for work or to settle in the area, or to sell them on the open market. For the project to proceed Dunalastair need to be able realise full market value on any houses that they decide to sell and would therefore be reluctant to attach any restrictions on use. Whilst the houses may well be sold to buyers who uses them as second homes, they would not be able to be used as holiday lets without first obtaining planning consent for change of use and also applying for a short-term let license from the local authority.

Furthermore, new legislation gives local authorities to the power to designate short-term let control areas which would enhance their ability to control the supply of short-term holiday accommodation. Perth & Kinross Council are currently consulting on whether to introduce short-term let control areas in those parts of the local authority area that have high numbers of second homes and holiday accommodation (analysis by PKC has identified Kinloch Rannoch as having the highest percentage of housing stock being used as second homes or and holiday accommodation). (The [consultation](#) closed on 18th August 2023.)

It should also be noted that the Scottish Government are proposing to give local authorities powers from April 2024 to increase the council tax premium on second homes should they wish to do so.

Theme: Allocations and meeting local priorities

What is affordable housing and how will you restrict the use and onward sale of any houses to the right groups of people?

Affordable housing is intended for people who are unable to afford or access housing for rent or sale on the private or open market. There are different types of affordable housing including social housing, usually provided by local authorities and housing associations, mid-market rent where rent levels are mid-way between social housing and private sector rents, and low-cost home ownership for those wishing to move into owner-occupation. The rent charge for the affordable rented housing that we are proposing will be more in line with social housing rents, while sale prices for houses for the low-cost homeownership will probably be discounted at between 20-40% below market value.

We will develop an allocations policy to ensure that houses are let or sold in a way that reflects locally agreed priorities and criteria (see below). We will attach a Rural Housing Burden to the title conditions of the low-cost home ownership to ensure that they remain as affordable housing in perpetuity (see *Number, Type and Tenure of Houses* [above](#)).

More detailed information about affordable housing and how it is allocated is available on RCT's website ([What is Community Led Affordable Housing?](#))

How will you ensure that the affordable housing is allocated or sold to people with a strong local connection?

The houses will be let or allocated using a locally agreed allocations policy. The allocations policy will seek to give priority to people who have a clearly established connection to the Rannoch and Tummel area either by virtue of residence, family, or employment but who are finding it difficult to find suitable accommodation that they can afford. Other criteria such as housing need (e.g. homelessness, overcrowding,) and community benefits such as for essential or key workers, or a positive impact on the school roll can also be used. Additionally, in the case of low-cost home ownership properties, applicants will also need to demonstrate that they are able to finance the purchase. The details of the allocations policy and the criteria to be used in selecting potential tenants or owners (in the case of low-cost home ownership properties) will be the subject of further community consultation. You can see an [example of an allocations policy](#) that is used in other similar community owned affordable housing projects on RCTs website.

Theme: Energy Efficiency

Will the houses be energy efficient and include measures to reduce carbon emissions?

All new homes are built to existing building regulation standards which require a high level of insulation and energy efficiency. We would like to make all the houses as energy efficient and carbon neutral as possible and will therefore carefully consider how we can include additional measures such as solar panels, air-source heat pumps, thermal energy stores electric vehicle charging points. We may be constrained financially as the Rural Housing Fund is unlikely to cover the costs for some or all of these additional energy efficiency measures and we will need to explore other ways that these may be funded.

Miscellaneous

There is a lack of resources in the village already without adding to the pressure.

Rannoch has experienced an 11.5% decrease in its population in the 10 years between 2011 and 2021. In the same period the number of young people aged 24 years and younger has decreased by 37% while the number of older people aged 65 – 74 years has increased by 28%. The reduction in the number of families with young children poses a risk to the future sustainability of the primary school. Local employers struggle to recruit and retain staff due in large part to the lack of affordable accommodation and, despite an increasingly older population, there is a severe shortage of the social care workers needed to support vulnerable elderly residents to continue to live independently in their own homes. Unless we do something to address the shortage of housing generally, and affordable housing in particular, these problems will only get worse. We will continue to lose our young people and be unable to attract young families and key workers to live and work here in Rannoch.

We need a community council to properly represent the views of the community. RCT is not the right vehicle to represent the views of the community, nor is it the right vehicle to propose such plans. You are either acting on behalf of the developer, or the community. You cannot do both.

We would welcome the establishment of a community council as a vehicle for representing the views of the community on wide range of issues including planning and new housing developments. To that end RCT are hoping to facilitate the establishment of a new community council sometime in the near future.

RCT is a community-based organisation and draw's its membership from the local community. Its purpose is to deliver and support projects and initiatives that enhance or strengthen the social, community, and economic life of the area. We have developed an affordable housing proposal as this was identified as a priority in the extensive consultation that was carried out as part of the development of the local community action plan ('Developing Rannoch's Sustainable Future') in 2015/16. The Housing Needs Survey in 2018 and this current consultation clearly demonstrates that there is still a high level of support for more affordable housing.

The proposal for community led affordable housing development needs the support of the local community if it is to progress which is why we carried out a consultation and encouraged as many people as possible to participate and share their views. We are trying to be as transparent as possible by sharing all of the comments and feedback we have received, both good and bad, as well as our responses to peoples' questions and concerns. We will continue to take this approach as the project progresses.

It should be a requirement that some of the direct neighbours of any site selected should have representation on the committee overseeing the project.

If the project gets to the stage where we submit a planning application we will be required to notify all immediate neighbours so that they have the opportunity to comment and raise objections as with any other planning application. We are also looking at how those living close to the proposed housing development can be consulted during the development of the design of the houses and also during the construction phase.