

Affordable Housing Plan Community Consultation

Summary of Results

We had a great response to the community consultation on the proposal for developing community owned affordable housing. We had good turn outs for both the Drop In events in the Village Hall, particularly the Wednesday Drop-In, where people had the opportunity to speak to members of the Project Team as well as the architect and RCT's technical advisers, the Community Housing Trust. We received lots of really useful feedback most of it very positive and supportive both of the need for more affordable housing and of actual housing development proposal. Below, we have summarised the results of the consultation and we have also provided initial responses to some of the questions and issues raised.

In total 71 responses to the consultation have been received of which 62 were made using the online survey and a further 9 being submitted on paper survey forms. In addition, three people submitted responses by email one of whom also submitted feedback via the online survey.

In response to Question 1, *'Do you support the provision of affordable housing for people who live or work in Rannoch'*, 68 respondents (95.8%) answered 'Yes'. Three people answered 'No' but one of these may be an error as they subsequently answered 'Yes' to Question 2.

In response to Question 2, *'Do you support the proposal to develop the site between the B846 and the River Tummel for 12 affordable homes for people who live and work in Rannoch, and 7 homes for private/open market sale or rent'*, 60 respondents (84.5%) answered 'Yes'. Ten (14%) answered 'No and one person was undecided (answered 'Yes/No?').

Those answering 'Yes' to both Questions 1 and 2 numbered 59 (81%) while two (2.8%) answered 'No' to both questions.

In addition to answering either 'Yes' or 'No' to Questions 1 and 2, most of the respondents also provided comments in support of their answers and in response to Question 3 – *'Do you have any general feedback on the proposals and designs, including the indicative layout?'* Question 1 received 47 comments, Question 2 received 41 comments, and Question 3 received 45.

To make it easier to analyse all the feedback we received we have grouped all the comments and questions under 7 broad themes or headings set out in the table below.

Theme	Number of responses
Layout and design	31
Need for affordable housing	28
Number, type/size and tenure of houses	26
Location	24
Holiday & Second Homes	19
Allocations and local priority	12
Energy Efficiency	6
Miscellaneous	18

Summary of Main Issues & Queries by Theme

(you can read the full *Comments by Theme* by clicking [here](#))

Layout & Design

Sixteen of the 31 comments about layout and design were positive or supportive. Of the other comments 6 were concerned with the design and appearance of houses being in keeping with the village and the architectural vernacular style - two of these also made a point about the plan being too limited and needing to fit in to a wider village context. Two respondents provided detailed comments that were critical of the layout and design saying that it would have an adverse impact on the streetscape (of the B846) – these comments seemed to be based assumptions about the height of the houses that were to be built.

Need for Affordable Housing

Nearly all (25 out of 28) of the comments recognised the need for more affordable housing in Rannoch citing difficulties in accessing housing for local people and those seeking employment in the area. Future sustainability of the village and the need to attract families and economically active people into the area were other factors frequently referenced in the comments. Two respondents questioned the validity of the housing need data as it was based on a study carried out in 2018 while one person questioned the scale of need and whether the proposal to build 12 affordable houses was really needed.

Number, type/size, and tenure of houses

Broadly speaking comments were generally supportive of the affordable housing while seeking assurances on rent levels and on the houses remaining affordable in the long term. Five comments related to the private housing for sale or rent, with 2 expressing opposition and others asking for measures that would prevent the houses being used as second homes or holiday lets. Several respondents queried why there were no one bedroom properties and two asked about provision for the elderly. Three respondents also questioned the size of the development and were of the view that it was far too large.

Location

The actual location of the proposed development featured in 13 comments, three of which were positive while the rest questioned whether other sites had been or could be considered and several considered the site unsuitable for aesthetic reasons. Six respondents cited potential issues with the capacity of the sewage system and a similar number raised problems with drainage and the risk of flooding in the field.

Holiday Lets and Second Homes

Nineteen comments related to concerns about the new houses being used for holiday lets and second homes. Concerns seemed to stem from a view that too much of the existing local housing stock is being used for holiday accommodation or second homes and that there is a risk, that the houses for sale would end up being used for the for the same purposes. Many of the comments were seeking assurances about the measures that would be put in place to ensure that the houses in the proposed development could be used only as permanent residences.

Allocations and Local Priority

Nearly all the 19 comments were strongly in favour of local people or those with a local connection being prioritised in the letting or selling of the affordable houses. One respondent asked for clarity on what is meant by 'affordable' and the restrictions that would be applied

on any onward sales while another referred to a US based scheme that addressed these issues. Opportunities for supporting employment and entrepreneurship was also mentioned in one of the comments.

Energy Efficiency and Low Carbon

Six respondents asked about what measures would be put in place to ensure high levels of energy efficiency and reduce carbon emissions (i.e. Solar/PV panels. EV charging points, heat pumps etc...). One respondent questioned whether the orientation of the houses, particularly the affordable houses could be optimised to achieve maximum benefit from PV panels.

Miscellaneous

There were also a wide range of miscellaneous comments ranging from an appreciation for work involved in getting the project to this stage, to concerns about the impact on local services/resources to questions about RCT's role and the consultation process.

Click [here](#) to see the Affordable Housing Project Group's responses to the consultation feedback.

Responses to Issues & Questions

Theme: Layout and Design

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

We are not yet at the stage of having detailed plans and designs but both RCT and Dunalastair Estate are very clear that the design and look 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 that of 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 e.g. using PVC window frames rather than more expensive timber ones.

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 yet have detailed designs for the proposed new houses but the intention is that they will be in keeping with existing properties on that street. The new houses will be no more than 1.5 or two storeys high with the height of the roofs similar to that of 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.

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 place plan.

The main priority for RCT is to meet the need for more affordable housing in Rannoch and the funding upon which the project depends can only be used for this purpose. However, we accept that any development needs to be seen in the wider context of the village as a whole 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 Conversation'](#) - on the new Local Development Plan provides an opportunity to discuss the wider future development of the village.

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 (access road, drainage, utilities, etc..) design, planning, 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 fund some where to live and expressed an interest in a buying a house rather than renting. We have not yet decided on the 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, are unable to afford to buy a house on the open market). Even when RCT decide not to exercise the right to 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 lays down standards in the design of 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 rare.

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 will check with Scottish Water again before developing more detailed plans – it may be that we will need to include measures to ensure that the housing development does not have an adverse impact on sewerage capacity.

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 taken on board the communities concerns about second homes and holiday lets. It is currently Dunalastair's intention to either rent out the homes they own on the site to those looking for work or to settle in the area or to sell on the open market. For the project to go ahead 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, Airbnb etc without first obtaining planning consent for change of use and also applying for a short-term let license.

Furthermore, new legislation gives local authorities 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 holiday accommodation). The [consultation](#) closes on 18th August 2018.

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

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 (e.g. essential/key worker, positive impact on the school roll) can also be developed. 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. An example of an allocations policy used by CHT for community owned affordable housing can be found on RCT's website (*insert link*).

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 and innovative thermal energy stores, electric vehicle charging points etc... when we get to the detailed design and development stage. Financial constraints may have an impact as the Rural Housing Fund is unlikely to cover the costs for some or all of these additional energy efficiency measures so we will need to explore other ways that these can 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 to 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.

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.

We realise that our proposal for a community led affordable housing development needs the support of the local community if it is to progress. This is why we have carried out this 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 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 as far as submitting a planning application we will be required to notify all immediate neighbours so that they have the opportunity to submit comments. Over and above that we are open to looking at how those living close to any proposed housing development can be involved both during the development of a detailed design and during the construction phase.