

Response ID ANON-MX9V-CYBU-7

Submitted to **Housing Sector Plan**

Submitted on **2019-02-14 13:01:59**

Introduction

1 What is your name?

Name (optional):

Katy Dickson (Scottish Land & Estates)

2 What is your email address?

Email (optional):

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3 What is your interest in the Housing Sector Plan?

Answer:

SLE represents rural land based businesses. Many of our members own and manage properties in private tenancies, and also have interests in developing new homes in rural areas.

Housing Sector Plan

4 The proposed scope of the Housing Sector Plan includes the entire life cycle of homes, and covers both existing stock and new build housing. Do you agree with this scope?

Agree

If not, why?:

5 The proposed vision for the Housing Sector Plan is described in Section 2. Do you think it sets the right level of ambition for the sector?

Not sure

What would you change? :

We welcome the alignment of SEPA's vision to the Scottish Government's vision set out in Housing Beyond 2021.

We would like the phrase 'minimising land take' to be reconsidered. We support the intention is to utilise brownfield sites which we support but in the context of land take in general, it is desirable to create quality places rather than focus on using as little land as possible as this risks high density housing which would be inappropriate in some areas.

There is no mention of viability. It can often not be viable to to develop certain areas of land or derelict properties. This has to be tackled if the common goal is to be achieved.

6 Section 3 broadly sets out the context and captures the key issues faced by the housing sector in Scotland. Is there anything vital missing, or that should be changed?

Yes

If yes, what?:

It is acknowledged that the delivery of new housing is reliant on availability of land but we would welcome the recognition that it is suitable and viable sites which are required.

We support the acknowledgement that the supply of infrastructure is a key component to the complex housing sector. While we appreciate the line 'we will ensure that the sector plans for strategic infrastructure (transport and utilities), and water and wastewater to align to help enable this', we are concerned that there is no indication of how this will be achieved.

7 Figure 6 describes the main environmental impacts that may arise through the life cycle of housing and the supply chain. Have we got these right?

Yes

Please outline any other impacts that concern you which are not included:

This seems to cover the key elements. We also suggest there is recognition of continual repairs and renovations.

We would welcome clarity that a balance should be struck i.e. development and occupation of housing will always have a detrimental impact.

8 Figure 7 summarises the main organisations that influence and are influenced by the people in the sector that we regulate. Bearing in mind that the list is not exhaustive, is anyone vital missing?

No

If yes, who?:

Housing Sector Plan

9 To help inform how we could best address compliance we want to understand what is preventing full compliance in the housing sector. (a) Thinking about the examples of non-compliance described in Section 5, are there specific barriers we could resolve as a regulator?

Yes

What are they?:

As SLE members are mostly based in rural locations the majority of their properties are reliant on private water supplies and wastewater systems. A number of members have attempted to connect to mains water but have found this transfer problematic. If Scottish Water was more constructive to deal with, then more properties would likely be moved from inadequate private supplies to compliant mains systems.

10 To help inform how we could best address compliance we want to understand what is preventing full compliance in the housing sector. (b) Which part(s) of the lifecycle of homes present(s) the biggest challenges and/or opportunities in the context of environmental regulation?

Please provide your thoughts here:

11 Addressing non-compliance: (a) Do you think the actions listed under 'How we are going to address non-compliance' are the right interventions to solve compliance in the sector?

Agree

If not, what actions do you think need to be taken? :

We welcome the majority of the actions set out. Early engagement, awareness raising, and support will minimise the levels of non-compliance and enforcement required.

While we support compliant private supplies we would welcome consideration of who pays for increased inspections and mandatory upgrades. This is particularly critical considering the issues property owners have had when trying to connect the mains supplies. The provision of rural housing should not be put at risk due to this.

Regarding compliance with drinking water standards, this work is being undertaken by DWQRS.

12 Addressing non-compliance: (b) Are there specific areas of non-compliance that are likely to respond better to the use of our enforcement measures than others?

Not Answered

If yes, what are they? :

13 The aspirations identified under Water, Materials, Energy and Land are our initial thoughts for how we could help the sector to go further. Do you think we have identified the right aspirations?

Agree

What changes do you suggest? :

SLE would like to see reconsideration of the phrase 'we should avoid building homes on land that would be better suited for a different purpose.' This is subjective. We do, however, support the recognition of competing land uses and the need for balance. The Land Use Strategy provides a useful resource on this. While we support the statement, we are not sure it is SEPA's role to 'promote the different roles and value of land'. We are keen to understand this better.

14 Do you think the potential actions listed in the table under 'What actions are we going to take?' will help us achieve the plans outcomes?

Not sure

What changes do you suggest? :

We think there needs to be more explanation about SEPA's role when 'working with' other stakeholders. For example in B (having climate ready homes) we are not sure what it will mean for SEPA to 'explore opportunities to reuse, retrofit and upgrade existing homes...'. Our members are awaiting the regulation which accompany the minimum energy efficiency standards and it would be good to know more about the role SEPA may play in this.

15 Do you agree with our proposed approach to outcomes and the outcomes identified in Section 6?

Agree

If not, why? :

16 Do you have any other comments or thoughts on the draft plan?

No

Please provide your thoughts here: