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From: Calum Murray [cmurray@ccg-homes.co.uk]
Sent: 28 January 2008 09:38
To: Housing Consultation 2007
Cc: Karen Trouten
Subject: Firm Foundations.doc



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CCGH/CM

25 January 2008

Social Housing Division
1HS Victoria Quay
Leith
Edinburgh
EH6QQ



Dear Sirs

Firm Foundations
The Future for Housing in Scotland

The Government is to be commended for placing the Quality, Quantity and Affordability of Scotland's housing at the forefront of the policy agenda.

The views expressed hereafter are those of our Company in support of representations made by Homes for Scotland.

The key point of the paper is the aspiration of Government to increase the rate of new housing supply in Scotland to at least 35,000 dwellings per annum by 2015. The establishment of a target is politically expedient and necessary, and the level is demonstrably achievable (Ref. Table 1, Homes for Scotland representations).

To ensure this target is achieved or bettered, it will be necessary not only to set a political context but also to create the practical means for acceleration of supply. This will require a host of measures across the range of subject matter questioned within the paper:

- **A pro-active rather than re-active planning and development system;** adequately staffed and resourced, sufficiently motivated and incentivised to gear up the pace of investment in housing and associated infrastructure. The culture or ethic required is that of the Development Corporations which successfully drove the growth of Scotland's New Towns.
- **Planning Policy Guidelines require to be clear and unambiguous, practicable and enforceable.** The Industry supports the ethos behind recent guidance embodied in SPP3 and SPP6, however it is apparent some important refinement is necessary if policy objectives, and stated growth targets are to be met:

SPP3: Planning and assessment of housing need, demand & supply requires to be harmonised between Planning and Housing functions, with Local Housing Strategies dovetailing into the Development Plan framework.

SPP6: Interpretation and application of this Policy across Scotland has been inconsistent, in part arising from the delayed issue of the associated Planning Advice Note.

The very technical nature of the implications arising from SPP6, e.g. use of micro-renewables, would suggest more effective implementation to be achieved via the building standards.

Some fine-tuning is, therefore, essential if this policy is to be practicable and enforceable as a planning tool. To date we have experienced significant delay arising from uncertainty over policy implementation and means of verification.

Flexibility will be essential, at least in the short term, as the associated technology is properly researched, developed and made available in the wider market, permitting construction use. To do otherwise, will only serve to extend project lead-in timescales, whilst serving to incur greater exposure to risk and cost for both the industry and the consumer.

These issues must be addressed if the Housing Supply Target set is to be deliverable and project procurement, particularly in the affordable housing sector, made more efficient and sustainable. The latter is a particular challenge for the Industry; new technology does not come cheap particularly where sources of supply are restricted and new skills are to be acquired for installation.

Government should also recognise, in consideration of the above, that the majority of Carbon Emissions in housing are attributable to existing stock and measures aimed at improvement in both the public and private sector stock base should be given as much, if not more, of a priority as new build.

- **The provision of an adequate supply of land** should go without saying, however, by way of example, the Glasgow & Clyde Valley Structure Plan, which has coverage over one third of Scotland's population, does not in its current form, support the stated/ proposed level of housing growth.
- **Adequate planned investment in new infrastructure**, particularly utilities will be a critical determinant of the Industry's ability to meet Target requirements.
This is also of fundamental importance to any attempt at strategic planning across Scotland's regions.

In terms of the affordable housing sector, the Paper advises that Procurement Strategy will be addressed later in the year. As a major constructor of Social Housing our Group looks forward to assisting where practicable in the shaping of policy; we are particularly interested to explore, with other stakeholders, the delivery of more efficient and effective methods of procurement.

Patently, this will be influenced by some of the issues raised above. In this context, if Government is to demand more from less, whilst increasing regulation and standards, review of procurement will require to be wide ranging and radical.

We welcome this opportunity to tender our views and hereby consent to use of our response publicly.

Yours Faithfully,

A handwritten signature in blue ink, appearing to read 'M. J. Murray', with a long horizontal flourish extending to the right.

M. J. Murray
Managing Director