

Scottish Government submission of 9 December 2022

PE1985/A: Evaluate *Garage to Home* Developments

Thank you for the opportunity to respond to this petition "*calling on the Scottish Parliament to urge the Scottish Government to commission an independent evaluation and provide national guidance on garages to homes developments*".

Background

We understand the background to be as follows.

The proposal being considered by Scottish Borders Housing Association (SBHA) and Berwickshire Housing Association (BHA), and noted in the petition as "*garages to homes*", is to construct new build homes on some existing housing association owned garage sites. Both associations operate in the Scottish Borders Council (SBC) geographic area, and SBHA has identified potential sites in Jedburgh and Hawick and BHA in Eyemouth. We understand that both Housing Associations will continue to retain a portfolio of garages.

We understand that the proposed new build project is supported by Scottish Borders Council (SBC) and the South of Scotland Enterprise (SoSE) and meets the objectives of the Council's Local Housing Strategy, which confirms a requirement for homes for older people. The Council's Local Housing Strategy also has a target that 10% of new build affordable homes should be wheelchair accessible and we understand that these proposed new build homes for older people will be designed for wheelchair users and/or older people with limited mobility. Scottish Borders Housing Association (SBHA) also notes in its Strategic Plan to support housing models that enable older people to remain in their community.

Scottish Government Response

There are five main points raised by the petitioner.

- 1. Development not subject to many planning regulations**
- 2. Independent investigation is needed**
- 3. Plans have been progressed without any community engagement**
- 4. Plans are driven primarily by financial considerations offering cheap means of affordable housing**
- 5. Pre-cursor to a Scotland-wide roll-out**

Based on our understanding and knowledge of the proposal that has been developed to date and taking each point in turn:

1. Development not subject to many planning regulations

The proposed homes will require planning permission and we understand that SBHA have discussed the proposal with local planners at Scottish Borders Council and a planning application will be submitted in due course. It should be noted that planning and building standards are separate regulatory regimes. In terms of standards, we understand that these new build homes will meet current Building Regulations, Housing for Varying Needs and Scottish Government “Greener” standards.

We also understand that these new build homes will be permanent, high-quality homes, designed for wheelchair users and/or people with limited mobility. They will meet the Silver standard for energy for space heating and be Net Zero at point of use (no gas) with Solar Panels to provide on-site energy generation.

2. Independent investigation is needed

We understand that the concept has been examined by a variety of stakeholder bodies. A broad feasibility study was initially undertaken as part of a Scottish Borders Council Community Renewal Fund (CRF) bid in Spring 2021 and subsequently agreed by the full Council. SBHA and BHA then submitted a joint proposal to the Council to undertake a feasibility study of the garage sites owned by both Housing Associations across the Scottish Borders. This bid was developed with partners in Scottish Borders Council with input from colleagues in the NHS and Social Care based on their understanding of need and design priorities. We understand that whilst it did not immediately proceed at this stage, the concept was considered to have merit by Scottish Borders Council and the South of Scotland Enterprise, who continue to be supportive.

3. Plans have been progressed without any community engagement

We understand that SBHA have been working on detailed design and preparation for planning consultation events. We also understand that discussions with councillors in the respective wards have taken place, a project briefing for all Scottish Borders councillors is to be developed and discussions have also taken place with local MSPs/MPs. In early November 2022, SBHA undertook a public consultation for the sites in Jedburgh and Hawick. This will have enabled attendees to find out more and allowed the Housing Association to receive feedback on the proposals, prior to any planning application.

4. Plans are driven primarily by financial considerations offering cheap means of affordable housing

We understand that these new build homes are permanent, high-quality homes, fully compliant with Building Standards and which will meet current Housing for Varying Needs and Scottish Government “Greener” standards.

We understand that costs on a m² basis may, in some cases, be more expensive than a traditional new build, but savings may be obtained with a system build, as time on site may be reduced compared with a traditional built home. As both housing associations already own the land, there will be no land acquisition cost associated with the development, but there may be costs associated with the regeneration of brownfield sites to create new build homes.

Using brownfield sites to create new build homes fits with the emphasis of the National Planning Framework 4 (NPF4)([National Planning Framework | Transforming Planning](#))

5. Pre-cursor to a Scotland-wide roll-out

While Local Authorities or other Housing Associations may look at the proposal, it will be for them to consider in their own context and, we understand, SBHA has no intention of leading a national roll-out of the proposals.

It should also be noted that Scottish Government does not prescribe, nor enforce, particular housing solutions, but rather it provides the planning framework against which developments are tested.

I hope the above is helpful in setting out the government’s position and understanding of the proposal.

