Local Government and Communities Committee

Planning (Scotland) Bill

Submission from the Older People’s Housing Coalition (OPHC)

Introduction

The Older People’s Housing Coalition (OPHC) is a partnership of organisations which came together to campaign for improvements to older people’s housing. It was launched in 2018 with the aim of influencing the Planning Bill to take greater account of the housing needs of older people in Scotland. OPHC members include Age Scotland, Castle Rock Edinvar, McCarthy and Stone and the Scottish Older People’s Assembly.

Q1. Do you think the Bill, taken as a whole, will produce a planning system for Scotland that balances the need to secure the appropriate development with the views of communities and protection of the built and natural environment?

The Older People’s Housing Coalition welcomes the publication of the Planning Bill. We believe it has the potential deliver on the ambition set out in the Independent Planning Review and provide “a proactive approach to expanding homes for the elderly” and meet “the needs of Scotland’s ageing population.”

But this will only be achieved if the Bill makes a specific reference to older people’s housing. Within a generation, a little under a third of all Scots will be aged over 60, increasing to almost 1.8 million by 2039. Those aged over 75 will have nearly doubled from 0.43 million to 0.80 million. In addition as Scotland’s population ages there will be an increasing demand for accommodation to meet the specific needs of single older people. By 2039 there are projected to be 484,800 people aged 65 and over living alone, an increase of 45% from 333,400 in 2014.

We know that older people want to live independently in their own homes for as long as possible, a fact recognised by the Scottish Government’s 2012 strategy for older people’s housing and referenced to in the Independent Planning Review.

We welcome the recognition of older people’s housing as a specific need in the revised 2014 Scottish Planning Policy but that recognition has not increased supply. We want this legislation to go further leading to the setting of clear targets similar to the targets that have been set for affordable housing. This target would be cross tenure (social, mid- market, private sector) to reflect the differing needs and circumstances of Scotland’s older people.

This must be complement with the incorporation of Age Friendly Design into the planning process and consideration what new requirements and incentives are necessary to achieve this – Key design elements for older people have been identified through previous work and research. These include: space and flexibility, adaptability, shared facilities, energy efficiency, daylight in the home and in shared
spaces, balconies and outdoor space, storage and dementia friendly design. This could be added as a separate bullet point.

We are calling on the Scottish Parliament to support the development of older and disabled people's housing by

- Setting out an obligation on planning authorities to identify appropriate sites for older and disabled people's housing, with a focus on developments close to local shops, GP's, services and transport links in towns and town centres in their local plans.
- Set national and local targets for the delivery of older and disabled people's housing across all tenures to meet the growing demand, and monitor delivery. This must be informed by planning authorities carrying out and keep annually updated accurate assessments of the housing needs of older people in their Housing Need and Demand Assessments.
- Future proof housing stock by ensuring that new housing either meets the needs of older and disabled people or can be easily adapted to meet the needs of older and disabled people and that older and disabled people are fully involved in developing local plans.

The Scottish Government’s own strategy for Housing for Older People, “Age, Home and Community” set out a range of initiatives designed to better support older people to live independently at home as they age. For example it noted that “for new housing to be attractive to older people it needs to be built on level ground… Easy access to transport links and amenities is important.” We welcome this approach as such our suggested amendments build on existing government policy but seek to enshrine it in the legislation. An approach we believe would provide a focus on the development of older and disabled people’s housing.

Q2. To what extent will the proposals in the Bill result in higher levels of new house building? If not, what changes could be made to help further increase house building?

The Coalition considers that the Bill will be a missed opportunity unless older and disabled people’s housing is prioritised in the legislation as envisioned by the Independent Planning Review. In response to question one we have noted our suggestions for increasing the levels of older and disabled people's housing supply.

We reiterate our call for older and disabled people’s housing to become a priority, as affordable housing has- with national targets.

In addition we do not believe the current development process adequately reflects the views of future communities and future residents. This process must be expanded to consider the views of communities of interest, not simply geographical communities. We recognise that many communities are concerned about unrestricted development; however we would note the potential benefit of further development as to supporting infrastructure improvements. We believe there is a need for planning authorities to inform communities about the potential benefits from different scales of developments, so that local people can better determine what size of change they may support. For example the development of 1000 rather than 100
houses may compel developers to build a primary school or GP surgery, which may in turn be supported by a local community.

**Q4. Will the changes in the Bill to the content and process for producing Local Development Plans achieve the aims of creating plans that are focussed on delivery, complement other local authority priorities and meet the needs of developers and communities? If not, what other changes would you like to see introduced?**

We agree that local participation of local development plans is important and is to be welcomed. However the LDP must emphasise the housing needs of older people as well as affordable housing. In addition we believe that the process for developing the LDP must consider the lifecycle cost and changing demography as part of developing its evidence base for the number of homes needed. For example, we know that housing that supports older people to live independently in their own homes will reduce pressure on health and social care budget and will help to tackle loneliness and isolation and contribute to the greater health and wellbeing of Scotland’s older people. This needs to be a consideration when determining the numbers, type, location and tenures of homes required for older and disabled people.

We believe there is a need for more organisations to be involved in setting local plans, given their expertise. For example, the legislation could compel councils to set up working groups with key stakeholders such as local developers, Scottish Water, SEPA, housing associations and other partners to tackle shared concerns about housing supply. The purpose of these stakeholder groups would be to clear bottlenecks in as the system and deal with infrastructure requirements, up front. This wouldn’t replace community engagement on specific developments but would help provide a view of what’s needed across a local authority.

**Q6. Does the Bill provide more effective avenues for community involvement in the development of plans and decisions that affect their area? Will the proposed Local Place Plans enable communities to influence local development plans and does the Bill ensure adequate financial and technical support for community bodies wishing to develop local place plans? If not, what more needs to be done?**

We support the involvement of communities in developing Local Place Plans (LPP’s). However we would ask how community capacity can be supported to ensure local groups are able to contribute to their creation. At a time when local authorities are facing ongoing budget reductions it is unlikely that sufficient resources would be directed towards capacity building.

For example we would like to see Local Place Plans link Strategic Commissioning Plans which are required from Health and Social Care Partnerships for both older people and disabled people. These should aim to have a locality or neighbourhood focus. But unless, resource is set aside then there is little prospect of having localised input into strategic planning.
Q8 Is the proposed Infrastructure Levy the best way to secure investment in new infrastructure from developers, how might it impact on levels of development? Are there any other ways (to the proposed Levy) that could raise funds for infrastructure provision in order to provide services and amenities to support land development? Are there lessons that can be learned from the Infrastructure Levy as it operates in England?

We believe the older and disabled people’s housing should be exempt from any proposed infrastructure levy.

We know that south of the border the Infrastructure Levy has acted as a barrier to development in some areas where viability is marginal. We would suggest that if the Scottish Parliament deems it appropriate to introduce an Infrastructure Levy then it needs to be thoroughly modelled and tested so that it does not inhibit development in any particular area or sector.

Q9. Do you support the requirement for local government councillors to be trained in planning matters prior to becoming involved in planning decision making? If not, why not?

We believe there is scope to improve understanding about the planning process and its links to broader economic development for elected members. We recognise that newly elected councillors do undergo training but we would welcome enhanced training that balances a theoretical understanding of planning law alongside a programme of site visits to different developments. This would give members a first-hand understanding of the role of planning.

Q12. Are there any other comments you would like to make about the Bill?

We recognise the campaign for Equal – or Community – Right of Appeal which would give residents or a "community" the same formal right to appeal as developers and it would also put in place restrictions on a developers repeatedly putting in the same application. However we believe that such an amendment would risk making many small developments unviable and increase the cost of building affordable homes and new homes for first time buyers.

An "equal" right of appeal would go against the intention of the legislation where the community is involved in the development of LPP’s, LDPs and indeed specific developments- by providing a veto opportunity at the end of the process it would deter communities from getting engaged in what the project would look like. The Coalition believe more could also be done by developers to engage with communities in the run up to a planning application to build local support and would be keen to explore how the consultation process can be strengthened at the outset so that the community view is heard clearly. This could include developers signing up to a consultation code of conduct. Rather than being viewed as a tick-box exercise, we would hope a more robust pre-application process could help create a built environment that is sensitive to local needs.
However we stress in our view that building in a right of appeal at the end of the process undermines the incentives for the community to get involved at the outset of the development.

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1 Mid-Year Population Estimates Scotland, Mid-2016 Population estimates by sex, age and area, April 2017, National Records of Scotland and National population projections by sex and age, with UK comparisons, October 2015, National Records of Scotland