Dear Sirs,

This is a response to the call for views on the proposed Planning (Scotland) Bill from Vivarium Trust (www.vivariumtrust.scot), a charity established in 2007 to promote co-housing in Scotland, and specifically to establish a pilot senior co-housing community, which could act as a model for progressive housing for older Scots in the 21st Century. Our founding principle has been that co-housing should be an option open to people of all financial circumstances.

Our work is based on the significant contribution Co-housing plays in providing progressive and diverse housing in other European countries, and the special relevance it has for older people. For example, in Denmark most housing for older people is co-housing and it is an established part of the housing market. In Scotland it is not, but it has great potential to address issues of isolation, and inappropriate housing for older people, empowering older people to provide their own support, in the context of the alignment of health and social care.

A community-led housing project for older people finds it very difficult to compete for sites, in a system where development sites are controlled through public policy and commercial companies have quick access to funding. A critical element in the jigsaw is identifying and securing a viable site. None of the current Scottish co-housing groups have yet managed to do this.

Our submission relates mainly to question 1 of the consultation;

1. 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?

Scottish Government policy on housing for older people is focussed on enabling them to stay within their own homes, however, research suggests that over half of older people wish to move (Demos), 40% of all house moves come from people who are 65 years or over (Savills) and over a third (34%) of people aged 65 or over in Scotland are considering a move from their current property (McCarthy & Stone – YouGov). While in some parts of the UK, developers cater for private housing for older people, this is less the case in Scotland. We estimate that the current supply of private housing specifically designed for older people represents around 2% of new build annual supply in Scotland which is significantly lower than the proportion of older people in Scotland (17%) and the projected increases in the older people population. While there are housing policies to try and increase housing supply, particularly in affordable housing, there is a lack of policy focus on the supply of older
people’s housing particularly for those currently living in owner occupation. Therefore, if the speculative market is not meeting the growing demand for housing for older people there is a need for such housing to be provided by alternative means. Such age specific requirements as do exist often relate more to the building form and floor layout which are not covered in planning policy and are limited within the building standards.

In England, The National Planning Policy Framework (NPPF) along with its National Planning Policy Guidance refers to creating “healthy and inclusive communities”. The guidance goes on to state that “the need to provide housing for older people is critical given the projected increase in the households aged 65 and over”. The guidance indicates that planning policy makers “will need to consider the size, location and quality of dwellings needed in the future for older people”.

Scotland’s National Planning Framework 3 does not provide such guidance on older people’s accommodation; however, references are made to older people’s housing within the Scottish Planning Policy’s guidance on Housing Needs and Demand Assessments. In that guidance the SPP indicates that “local authorities are required to consider the need for specialist provision that covers accessible and adapted housing, wheelchair housing and supported accommodation, including care homes and sheltered housing. This supports independent living for elderly people and those with a disability. Where a need is identified, planning authorities should prepare policies to support the delivery of appropriate housing and consider allocating specific sites”.

While the Scottish Planning Policy is helpful, it is focussed on specific and existing needs for ‘specialist’ accommodation for older people who have illnesses, frailty or a disability but the majority and growing numbers of older people do not necessarily require ‘specialist’ accommodation. What is missing is that older people, the majority of whom live in owner occupied housing, lack a choice of age appropriate accommodation.

The English planning policy approach of requiring local authorities to provide accommodation for older people gives a broader more inclusive policy that is designed to meet the whole of the older people population compared to the more tightly defined Scottish policy aimed at older people who currently have the greatest need for ‘specialist’ supported accommodation.

Essentially, ‘older people’ is too wide an age category as an active old age can stretch from say 60 years to 90+ years. The Scottish policy focus both in planning and housing tends to be towards frail older people many of whom require some form of support. Many active older people who are relatively fit require a home that is fit for purpose now, but also suitable for their anticipated future needs which might be reasonably expected to be different.

Our two main observations in relation to the proposed Bill are;
Explicit planning guidance and policy should encourage new developments to meet the aspirations and requirements of the growing number of older people in Scotland.

Scottish Local Authorities should allocate and maintain registers of sites for collective self-build/commission as part of Local Development Plan and SHIP processes. This should include sites for older people, recognising their proximity and access needs.

We thank you for the opportunity to comment.

Yours Sincerely,

Andrew Prendergast
Chair
Vivarium Trust