



Local Housing Strategy

2019 - 2024

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1. Introduction

Local Housing Strategies were introduced as part of the Housing (Scotland) Act 2001 to widen the strategic and enabling role for local authorities in relation to housing in their area.

The Local Housing Strategy (LHS) sets out the outcomes the Council and its partners want to achieve, and the actions they will take, to address housing need and demand in Moray. The LHS forms the basis for future investment decisions in housing and related services.

The complete LHS comprises of this document plus a suite of related documents which cover the Council's strategic planning for housing. The related documents are:

- Strategic Housing Investment Plan
- Asset Management Strategy
- Scheme of Assistance
- Tenant Participation Strategy
- Local Housing Strategy Equality Impact Assessment
- Moray Housing Need and Demand Assessment 2017

2. Partnerships

The development of the LHS is overseen by the multi-agency, officer level, Housing Strategy Group. This group includes representatives from the relevant Council Services and other agencies e.g. Planning, Health and Social Care Moray, NHS Grampian, Registered Social Landlords (RSLs), Scottish Government enterprise companies, private sector representative bodies and Third Sector Representatives. Housing Strategy Group will be a key consultation body as the LHS develops.

The Housing Strategy Group will continue to provide a single forum through which housing providers; housing support services, planning agencies and housing developers can participate LHS development. A full list of member organisations is available at Appendix 1. The Housing Strategy Group operates within the Community Planning Framework and is responsible for advising on strategic issues relating to housing.

Key partnership and governance arrangements are:

Group	Remit
Moray Council Communities Committee	The Council's Communities Committee has delegated authority for the Council's strategic housing function ¹ . The Communities Committee approved this draft LHS for public consultation on 5 February 2019.
Housing Strategy Group	Strategic lead for developing, monitoring and Reviewing the Local Housing Strategy.
Housing Market Partnership	Lead role in developing Housing Need and Demand Assessments
Moray Strategic Commissioning Group	Considers service priorities and approaches to providing adult social care, including the housing contribution.
Moray Tenants Forum	The main vehicle for consultation with Moray Council tenants
Affordable Warmth Group	Works in partnership to ensure provision of an affordable warmth service across Moray
North and Islands Homelessness HUB	Shares benchmarking and best practice, and joint projects across Moray, Highland, Aberdeen, Aberdeenshire and all three Island Council areas.

3. Consultation

The LHS will be subject to a period of formal public consultation from 6 February to 15 March 2019. The final version will be considered by the Communities Committee on 2 April 2019. Consultation will take the form of a web-based survey, publicised via the Council's social media, as the primary means of interaction with the general public. The web-based survey will take the form of a series of questions seeking approval ratings on the actions proposed in the draft LHS, with the facility to provide text/comments.

¹ All Council Committee papers are available at http://www.moray.gov.uk/moray_standard/page_39823.html

4. Equalities

The Equality Act 2010

The Equality Act 2010 introduced a statutory public sector duty to:

Eliminate discrimination, harassment and victimisation
Advance equality of opportunity
Foster good relations

The statutory duty requires need to be considered in respect of certain protected characteristics:

- Age
- Disability
- Sex (including Pregnancy and Maternity)
- Gender reassignment
- Sexual orientation
- Race
- Religion and Belief

Protection from discrimination for disabled people applies only to those disabled people who are defined as disabled in accordance with section 6 of the Act. However, the Act also provides protection for non-disabled people who are subjected to direct discrimination or harassment because of their association with a disabled person or because they are wrongly perceived to be disabled.”²

The HNDA 2017 provides a robust and credible evidence base on equalities issues, and the findings have been mainstreamed throughout the LHS priorities, outcomes, actions and monitoring arrangements.

Equality Impact Assessment

The Housing Strategy Group has completed an Equalities Impact Assessment (EIA) as part of the development of this LHS. The LHS EIA was considered by the Communities Committee on 5 February 2019, and has been subject to consultation with equality groups and stakeholders. The EIA is available at Appendix 4.

The results of these workstreams have been mainstreamed throughout the priorities, outcomes and actions included in this LHS. This LHS will give significant priority to addressing the needs of homeless people and people with disabilities. This is based on the findings of the HNDA 2017, as well as the result of partnership working with the Health and Social Care Moray.

² Equality Act 2010 Guidance, Office for Disability Issues, HM Government available at <http://odi.dwp.gov.uk/docs/law/ea/ea-guide-2.pdf>

5. National and Local Planning Framework

This strategy will support the Council to deliver Scottish Government priorities and outcomes within the wider community planning framework.

The Scottish Government's Joint Housing Delivery Plan 2015 set out the national strategy for housing. The overarching vision of this Plan is:

“ that all people in Scotland live in high quality sustainable homes that they can afford and that can meet their needs”

The Scottish Government aims to spend over £3 billion to deliver at least 50,000 affordable homes across Scotland by March 2021, of which 35,000 will be for social rent. On 4 September 2018, the Scottish Government began an extensive consultation (Housing Beyond 2021) with local government, businesses, the third sector, home owners, tenants and others to begin working on a vision for how our homes and communities should look and feel in 2040 and the options and choices to get there. Moray Council will contribute to this consultation during 2019.

Related Strategies and Plans

Moray 2027

Moray 2027 provides the overall aims of the Community Planning Partnership, and details how the Board will contribute to delivering the Scottish Government's strategic priorities.

The Partnership has identified four main priority areas:

- growing, diverse and sustainable economy
- building a better future for our children and young people in Moray
- Empowering and connecting communities
- Changing our relationship with alcohol

Moray Local Development Plan 2020

The Scottish Government, in agreement with COSLA and ALACHO, published revised Local Housing Strategy Guidance in 2014³ and also published Scottish Planning Policy (SPP) in 2014⁴. Together these documents require housing and planning authorities to work closely to identify housing need and provide sufficient development land to meet that need, and to develop, publish and review the LHS and the Development Plan in tandem. SPP states that *“the HNDA, development plan, and local housing strategy processes should be closely aligned, with joint working between housing and planning teams”*

The Local Development Plan and the Supplementary Planning Guidance on Affordable Housing have historically been the main source of development

³ Local Housing Strategy Guidance available at: <https://beta.gov.scot/policies/more-homes/housing-and-planning-delivery-framework/>

⁴ Scottish Planning Policy available at: <https://beta.gov.scot/publications/scottish-planning-policy/pages/4/>

opportunities for the provision of new affordable housing. The housing supply targets in the Local Development Plan have been based on the Housing Need and Demand Assessment 2017. The Proposed Plan became the “settled” view of the Council in February 2019 and will be adopted by the end of July 2020.

Moray Economic Strategy 2019-2029 and Moray Growth Deal

The overall objective of this Strategy is to grow and diversify the economy. It focuses on achieving four outcomes:

- Outcome 1 Qualification Levels - An increase across all ages and genders in qualifications relevant to growth sectors.
- Outcome 2 Small Business Growth - More small and medium-sized businesses employing between 10 and 100 people.
- Outcome 3 Talent Attraction, Retention and Return - More skilled, higher paid jobs that deliver net in-migration in the 16-29 age range.
- Outcome 4 Business Competitiveness - An increase in capital investment and focused workforce development to strengthen competitiveness.

It also reflects the work undertaken for the emerging Moray Growth Deal. The Moray Growth Deal is a regional deal designed to boost economic growth across Moray. It is a long-term plan centred around specific projects designed to transform the economy, address concerns around encouraging young people to live and work in the area and address gender inequality in employment. It brings together Scottish and UK governments, Moray Council, partners from across the public and third sectors and private businesses. Each of these partners will be investing in a better future for Moray

Health and Social Care Moray Strategic Plan 2016-2019

Health and Social Care Moray are working to improve care and support for people who use health and social care and their unpaid carers, under the governance of the Moray Integration Joint Board (MIJB). The MIJB strategic outcomes are:

- More people will live well in their communities - the population will be responsible for their own health and wellbeing – the community will respond to individual outcomes
- Carers can continue their caring role whilst maintaining their own health and wellbeing
- Relationships will be transformed to be honest, fair and equal Investment in a seamless workforce to ensure that skills, competencies and confidence match the needs to enable people to maintain their wellbeing
- Technology enabled care considered at every intervention

The Plan includes improvement programmes on: Modernisation of Primary Care, Focus on Dementia, Self-Directed Support, Unscheduled Care, Older People in Acute Care, Patient Safety Programme, Long Term Condition Action Plan.

The plan acknowledges the vital contribution that housing can make to improving health and wellbeing outcomes and includes a Housing Contribution Statement.

6. Moray Context

Moray is a geographically varied region of Scotland, incorporating the Moray Firth coastline, the broad lowlands further south, and the more mountainous area that is part of the Cairngorms National Park. Moray covers just over 2,200 square km and has a low population density of 39 persons per square km.

Housing Market Drivers

The LHS uses the Moray Housing Need and Demand Assessment 2017 (HNDA) as a key evidence base. The HNDA 2017 was appraised as “robust and credible” on 5 April 2018, by the Scottish Government’s Centre for Housing Market Analysis (CHMA)⁵.

Demographic:

- Moray’s estimated population in 2017 was 95,780 and that the population grew by 4.7% between 2007 and 2017⁶. Moray’s population is projected to grow to 103,587 by 2041⁷.
- Moray’s population growth is not uniform across HMAs, nor across age groups.
- Numbers of households are projected to increase faster than the population will increase. This is probably driven by the ageing population.
- Numbers of households exceed the highest NRS Household Projections i.e. (high migration projection).
- There is a long term trend for significant out-migration of younger people aged 18-21, which suggests that many young people move away to enter higher or further education, or to seek better employment opportunities. There is no evidence that these young people return in similar numbers in later life.
- There were 43,065 households in Moray in 2019, and by 2039 there are projected to be 48,739, an increase of **13%**⁸. The number of households is projected to grow faster than the population will grow. This is consistent with the national trend towards increasing numbers of older, smaller households.
- In 2019 there were 13,371 households age **65+**, making up 31% of all households. By 2039, this is projected to rise to **38%** of all households. This will drive increasing demand for smaller accessible housing in all tenures with associated services, across all HMAs.

⁵ http://www.moray.gov.uk/moray_standard/page_95565.html

⁶ Mid-2017 Population Estimates Scotland supplied by the National Records of Scotland. © Crown Copyright

⁷ Population Projections for Scottish Areas (2016-based) (Table 1) supplied by the National Records of Scotland. © Crown Copyright

⁸ NRS, Household Projections for Scotland, (2016 based) (Principal)

Economic:

- The economy is heavily dependent on the North Sea oil and gas industry. There are economic risks associated with continued downturn/ delayed recovery of the north sea oil industry.
- There are risks to Moray's economy associated with the potential closure of military bases.
- Moray's long term trend for comparatively low household incomes makes housing in all tenures less accessible. Lower quartile incomes are roughly equivalent to National Minimum wage earnings at the age 21+ rate.
- Council rents are some of the lowest in Scotland. Private rents have been increasing steadily over several years and Local Housing Allowance falls just below some average private rents.

Housing stock

- Moray has low levels of ineffective housing stock, across tenures, with 95% of dwellings occupied. This level of occupancy has increased slightly since 2011.
- Moray does not have any significant problems of low demand in the public or private sector.
- Numbers of second homes in owner occupation have increased slightly since 2011, but remain most prevalent in Cairngorms HMA (13%).
- Moray has a higher proportion of detached /semi-detached properties than Scotland as a whole, and fewer flats.
- Social rented housing stock levels have remained almost unchanged since 2011 (19%).
- Affordable rented housing is generally in better condition, better maintained and more fuel efficient than private sector housing, due to continued investment.
- The bulk of any recent new build activity in all tenures has taken place in Elgin and Forres HMAs.

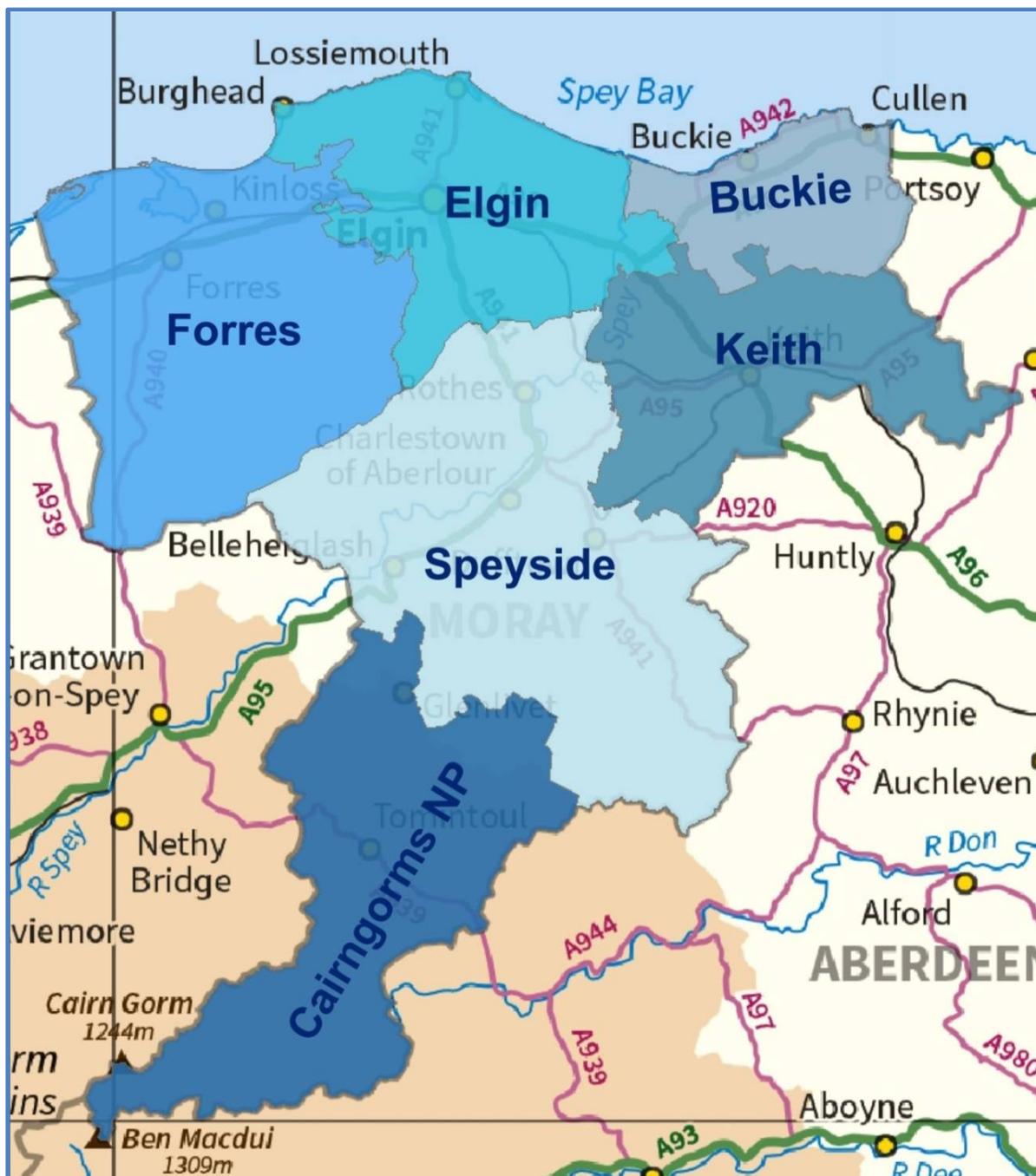
MOD considerations

- Moray 2027 states that current population projections have not taken into consideration the relocation of three Typhoon squadrons in 2014/15. The MOD suggest that in the next 10 years there could potentially be an additional 3,000 – 4,000 people (military and support personnel and their families) coming to Moray. The MOD is responsible for meeting the housing need of these personnel and their families.

Housing Market Areas

Housing Market Areas (HMAs) are geographical areas where the demand for housing is relatively self-contained, and are intended to be meaningful housing search areas identifiable to the general public. There are 6 Housing Market Areas in Moray; Buckie, Elgin, Forres, Keith, Speyside and the area of the Cairngorms National Park that lies within Moray Council's boundary. The methodology used is detailed in the HNDA 2017.

These 6 housing market areas allow the Council to set appropriate targets for each area, and so ensure the appropriate distribution of investment and service provision, to meet needs. The 6 Housing Market Areas (HMAs) are illustrated below.



7. Outcomes from LHS 2013-2018

LHS outcomes and actions have been reviewed annually throughout its term, have been considered by Moray Council Communities Committee with the results published on the Council's website. We have been able to report some successes. However a number of key issues found in HNDA 2011 were also found in HNDA 2017, and as a result these key issues will be continued from LHS 2013-18 to LHS 2019-24. These are:

- Affordability of housing continues to be the most significant barrier to accessing housing in Moray. Lower quartile income households (earning £13,630 per year) could afford to buy properties priced at no more than £54,520. Access to housing is further constrained by the comparatively low Local Housing allowance, the comparatively small private rented sector, and potentially by the roll out of Universal Credit.
- There continues to be an acute shortage of affordable housing, driven mainly by Moray's low average earnings. This is despite significant numbers of new build properties for social rent delivered through the Strategic Housing Investment Plan.
- There continues to be pressure on affordable housing supply of specialist housing arising from the significant numbers of (often older) households seeking accessible housing. This is despite delivery of approximately 30% of all new build completions in the form of ambulant disabled housing.
- There continues to be significant numbers of people experiencing fuel poverty, despite investment in insulation via the HEEPS ABS scheme which was targeted at those households at greatest risk.

8. Local Housing Strategy Priorities

This section summarises how the LHS 2013 – 2018 will use an outcome focused approach to contribute to the achievement of the Scottish Government’s strategic priorities and those of Moray, detailed in the Local Outcomes Improvement Plan.

The Local Housing Strategy will concentrate activity on 4 agreed strategic priorities which Moray Council and its partners will seek to deliver during the next 5 years.

These are the priorities the Council and its partners would like to achieve for the citizens of Moray:

Priority 1: To improve access to housing across all tenures and address housing need

Priority 2: To prevent and alleviate homelessness

Priority 3: To assist people requiring specialist housing

Priority 4: To improve the condition and energy efficiency of housing, and minimise fuel poverty

Each LHS Priority details:

- What our agreed outcomes⁹ are - what we want to achieve
- The current legislative and policy context
- What the key issues and drivers are
- Planned actions – what we are already doing, or plan to do, to achieve our agreed outcomes
- Anything else that needs to be done during the term of this LHS and beyond to achieve agreed outcomes.

⁹ “An outcome is a result we want to happen”, from The Scottish Social Housing Charter 2017, Page 13

Priority 1: Improve access to housing across all tenures and address housing need

Approach

The Council will work to reduce the number of households in housing need through increasing the supply of affordable rented housing, and by making the best use of existing housing in all tenures and investment in affordable housing. The Council will work in partnership with other housing providers to deliver good quality affordable housing of the right type and in the right locations and to promote sustainable communities where people want to live.

Outcomes

- There is an adequate supply of affordable housing
- Make the best use of existing social rented housing
- Minimise the number of empty homes

Context

The Council's Housing Needs and Demand Assessment (HNDA) provides the evidence base of the housing supply targets set out in the LHS in relation to the number, size, type, design and location of new affordable housing to meet a range of needs. The findings of the HNDA also underpin the housing land allocations Moray provided in the Moray Local Development Plan (2020).

The HNDA 2017 found:

- increasing pressure on smaller accessible social housing, from older people and people with health problems, who cannot find appropriately designed accommodation in any other tenure.
- Increasing pressure on supply of 1 bed general needs housing from homeless households, predominantly single persons, requiring permanent housing options and temporary accommodation. This is discussed in greater detail under Priority 2 Homelessness and in our Rapid Rehousing Transition Plan.
- Increasing pressure on supply of housing from other household groups e.g. care experienced young people, people with learning disabilities requiring alternative accommodation or transitioning into adult services. Most groups also require 1 bed general needs housing.
- Sustained pressure from households requiring specialist housing e.g. ambulant disabled and wheelchair accessible housing, extra care and other supported housing.

Key issues and drivers

The Strategic Housing Investment Plan (SHIP) sets out how the Council and its partners will make the best use of the available resources to meet housing need in Moray and deliver its LHS investment priorities.

The SHIP will be the key mechanism for agreeing partner contributions to the delivery of the Moray Affordable Housing Programme. Through the SHIP review process, we will ensure that our investment proposals of our partners align with our LHS outcomes and priorities in terms of the tenure, type of housing and location. The SHIP will support the outcomes of the Council's Rapid Rehousing Transition Plan in respect of the provision of permanent housing solutions for homeless people. The Plan is set out in more detail under Priority 2.

The Council will work with partners to make the best use of resources available to Moray and to address planning and funding constraints that may impact on the delivery of the affordable programme.

The scale of the Moray Affordable Housing Programme is determined by the level of resources provided by the Scottish Government. As part of the More Homes Scotland, the Scottish Government has prioritised the building 50,000 new affordable homes by 2023, including 35,000 homes for social rent by March 2021. To achieve this target local authorities have been given resource planning assumptions to 2020/21 for their affordable housing programmes. The investment proposals set out in the Council's SHIP are based on the Moray resources planning assumption. These resources will enable the Council and its partners to plan the delivery of the Moray programme until 2020/2. However, it should be recognised that the planned supply of new housing will not be sufficient to fully address housing need in Moray. The level of resources available beyond 2021 was not known at the time of writing.

The Local Development Plan 2020 (LDP) will support LHS housing supply targets housing by providing a generous supply of housing land, in excess of HNDA requirements, in locations throughout Moray, distributed in accordance with HMA population distribution. The LDP also includes a range of key policies which support the delivery of affordable housing and promote quality and community sustainability in terms of urban design and placemaking. Housing development land provision for the Cairngorms HMA is made by the Cairngorms National Park Authority but is equally generous.

Although the Council have had some success in developing an affordable housing landbank in Moray, this alone will not be sufficient to deliver the affordable housing programme. With vast majority of housing land allocated in the LDP (2020) in private ownership, the delivery of the Moray new supply programme will continue to be dependent on developer affordable housing contributions required by the LDP Affordable Housing Policy. This means that a substantial part of the programme, including timescales for delivery, will be determined by the plans of private developer partners.

Since 2009/10, the Council has been the main provider of new affordable housing in Moray. The Council is committed to building 70 houses per annum until 2020 funded

mainly by Housing Revenue Account (HRA) prudential borrowing, supported by rent increases. However, a review of the Housing Business Plan will be carried out during 2019 and this will assess the capacity of the HRA to sustain borrowing beyond. A key consideration of the Business Plan assessment will be to ensure that Council rents continue to be affordable to tenants and this may restrict options for increasing rents to fund house building. During the life of the LHS, it is expected that the Council will become increasingly reliant on housing association partners to deliver the Moray Affordable Housing Programme.

The form of affordable housing that best meets housing need in Moray is social rented housing. However, it is recognised that the provision of intermediate tenure such as mid-market rent and low cost home ownership, including shared equity and self-build, will be an appropriate housing solution for many households and for some communities, particularly those in rural areas. The provision of intermediate tenure can also contribute to community sustainability aspirations by supporting mixed tenure sustainable places.

Although the resources provided by the Scottish Government will be the key source of funding for affordable programme, the Council and its partners will be able to access other sources of funding to support the delivery of affordable housing, including the funding channelled through the Housing Infrastructure Fund, the Rural Housing Fund, Moray Growth Bid, Council Tax revenue from empty homes and developer affordable housing commuted sums.

It is possible that the opportunities to deliver affordable housing may emerge from the Moray Growth Bid, particularly in rural areas and as part of Town Centre regeneration initiatives.

Empty properties represent approximately 4-5% of Moray's total housing stock. However, approximately 50% of empty homes are used as second or holiday homes or are liable for the Council Tax Levy. A further 20% are transitional vacancies where the majority of properties return to occupation within six months, without the Council's intervention.

Strategy

- We will continue to work with a range of partners, including housing associations, to deliver affordable housing, agree outcomes and delivery plans and address the range of challenges that constrain affordable housing delivery in Moray.
- We will prioritise investment decisions via the SHIP to ensure that we make the best use of resources to meet housing need in Moray.
- We will seek to develop the landbank for affordable housing
- We will work the planning service to implement the Affordable Housing Policy to ensure that affordable housing contributions meet housing needs priorities in terms of the location, type, tenure and mix of housing.
- We will ensure that the proposals set out in our SHIP supports delivery of the Rapid Rehousing Transition Plan.

- We will ensure that our investment decisions are aligned with the aims of the Health and Social Care Moray Joint Commissioning Plan and Housing Contribution Statement.
- We will work with our affordable housing partners to ensure that their development proposals meet local planning policy in terms of placemaking and urban design.
- We will maximise opportunities emerging from the Moray Growth deal and other initiatives to deliver affordable housing.
- We will seek to meet the specific needs of rural communities for affordable housing.
- We will seek to make best use of existing housing

The actions the Council and its partners have agreed to take during the term of this LHS are described below:

Action: Increase supply of affordable housing

Affordable Housing Supply Target

There is a need for 424 new homes across all tenures per year during the term of this LHS. Approximately **56% of these should be affordable**. In the context of the funding and delivery constraints described above, it will be challenging for the Council's Strategic Housing Investment Plan (SHIP) to deliver affordable housing in sufficient numbers to meet the Housing Supply Target set out in the table below. Despite this we have set aspirational targets for delivery, which regard HNDA 2017 findings as a minimum target. These targets will be reflected in each annual SHIP, as far as possible

Moray Housing Supply Target (5 years)									
Tenure	Housing Market Area						Moray	Average per year	
	Buckie	Cairn gorms	Elgin	Forres	Keith	Spey side			
Social Rent	165	8.2	549	167	78	66	1,034	207	87.7%
Below market Rent/ Intermediate tenure	26	1.3	68	24	13	12	145	29	12.3%
Total affordable housing	191	10	618	191	91	78	1,179	236	100%
	16.2%	0.8%	52.4%	16.2%	7.8%	6.6%	100%		

Figures may not sum due to rounding

This geographical distribution of need is broadly in proportion with the distribution of Moray's population and dwellings. There is **no evidence of significant migration** between HMAs. The Local Development Plan 2020 allocates housing development land using the same geography and also bases its targets for delivery on the HNDA 2017.

Intermediate tenures

The HNDA 2017 found that approximately **12%** of affordable housing could be delivered as intermediate tenures e.g. mid-market rent (MMR), shared equity during the term of this LHS.

Moray's private sector rents and Local Housing Allowance (LHA) are both much lower than nearby urban areas e.g. Aberdeen, Inverness and recent experience has shown that it is challenging to bring forward a financially viable new build MMR development at current LHA rates.

The Scottish Government has recently made a scheme available for Shared Equity for Older People. We intend to include housing built to ambulant disabled standards for New Supply Shared Equity (NSSE) in the SHIP during the term of this LHS, as a trial.

With these factors in mind, we will encourage proposals for delivery of:

- Mid-market rent in locations where they are most likely to be financially viable, in larger towns, close to centres of employment i.e. **Elgin, Forres**.
- Shared equity for first time buyers as part of larger developments (i.e. 50+ affordable units) where they provide an opportunity for **tenure diversification** and delivery of sustainable neighbourhoods, as well as an opportunity to alleviate overcrowding and free up social rented housing.
- Shared equity for older owner occupiers, as part of larger developments (50+ affordable units) built to accessible design standards, as an opportunity to promote both tenure and **generational diversification**, deliver sustainable neighbourhoods, as well as to facilitate downsizing and to provide **greater tenure choice** to our increasing older population (see Priority 3).

Types and sizes of affordable housing

Household projections show that Moray's average household size is reducing, the proportion of older and single person households is increasing, and the proportion of families with children is likely to remain unchanged.

There is a mismatch between demand for, and supply of, different sizes and types of affordable rented housing.

Over the last 10 years, Moray Council has improved its methods for estimating the number of affordable housing relets expected from existing stock, and estimating the best mix of house sizes and types required each Housing Market Area to be built through SHIP projects. Since 2011, the Council has been using this model to **identify imbalances in supply** in each Housing Market Area.

Over the last 10 years, Moray Council has been using the Scottish Government's More Homes Division investment to rebalance supply with demand, by investing in

the types and sizes of housing which will reduce the imbalance. We intend to continue with this approach through the term of this LHS.

There is considerably less pressure on 2 bed general needs housing and much higher than average pressure on 4+bed housing. We will operate a **presumption against inclusion of 2 bed general needs** properties in our SHIP. We will only include 2 bed general needs housing in our SHIP where:

- they will form part of a larger (50+ affordable units) housing development where their inclusion will contribute to the establishment of a balanced and diverse new community and where their inclusion will provide opportunities for residents to move within their community over the long term; or,
- where their inclusion is justified by the Model described above. This is most likely to occur in rural settlements which where the range of housing options is more limited.

We will operate a **presumption against inclusion of 1 bed ambulant disabled housing in our SHIP**. Alternatively we will promote delivery of ambulant disabled housing with a minimum of 2 bedrooms in the SHIP. This approach provides a more flexible house type, more able to meet the health needs of the likely occupant(s). This approach is complemented by amendments to the Council's Allocations Policy implemented in 2013, whereby all single person households assessed as requiring ambulant disabled or wheelchair accessible housing are considered for 2 bed housing on an equal basis with couples, to maximise the likelihood of receiving an offer of rehousing.

Similarly, given the reducing demand for sheltered housing, we will not approve any new supply sheltered housing for inclusion in our SHIP. However we **will include new supply extra care housing**, see Priority 3.

Rural Housing

We will support rural communities to identify their own housing need. Often this associated with the community's own regeneration aspirations and/or area specific action plans.

Moray LDP 2020 proposes amendments to the Affordable Housing policy whereby an affordable housing contribution is required from every house proposed. We believe this approach is fairer to rural communities where development opportunities are smaller scale.

The Scottish Government currently provides a **Rural Housing Fund**¹⁰ to increase affordable housing across all tenures in rural Scotland. Proposals for intermediate tenures in rural areas will be considered

¹⁰ <https://www.mygov.scot/rural-housing-fund/overview/>

Action: make best use of existing housing

Review Moray Council Allocations Quotas annually

Since 2012/13, the Council has reviewed its quotas annually and they have remained almost unchanged. The Homeless List quota for 2019/20 has been set at 45% (+/-5%) to aid delivery of the Council's Rapid Rehousing Transition Plan.

Minimise the time taken to relet vacant social housing

Moray Council's void policy and procedures are under continual review. At any given time approximately 20-30 Council properties are vacant and, on average are relet within 35 days.

The Scottish Housing Regulator is responsible for monitoring the relet performance of RSLs.

Sheltered Housing Review

Moray Council owns 150 units of sheltered housing. The built form of this stock varies considerably; from a 30+unit complex with communal spaces; to blocks of 1 bed flats; to clusters of individual bungalows in semi-rural areas.

Some of this sheltered stock has been defined as low demand for many years, mainly due to issues of design and/or rural location. Some of this sheltered stock has history of substantial service charge arrears, which has led us to question whether the sheltered housing warden service is wanted/needed in all cases.

We plan to reconsider the best use of this stock. We plan to complete a Sheltered Housing Review which will include consultation with tenants and stakeholders. This Review could potentially consider some of the low demand sheltered housing for de-registration with the Care Commission, on a sensitive and possibly incremental basis, possibly at the end of a tenancy or with the tenant's agreement. Any re-designated stock could be reused to increase supply of permanent and temporary general needs housing which would assist us to deliver the aims of our Rapid Rehousing Transition Plan.

Minimise empty homes in the private sector

Empty properties are a wasted resource which could contribute to increasing availability in the wider housing market.

The Council Tax Register is the most comprehensive source of available data on empty homes. The Register has been analysed to quantify Moray's empty homes and to inform this LHS. Although numbers fluctuate, empty/second/holiday homes represent approximately **4-5%** of Moray's total housing stock, and this is consistent with Census 2011.

There are a wide variety of Council Tax exemptions and discounts available¹¹. Analysis of these exemptions and discounts consistently shows that approximately 50% of empty homes are used as second or holiday homes or are liable for the Council Tax Levy. A further 20% are transitional vacancies¹² where the majority return to occupation without the Council's intervention.

From April 2015, owners of domestic properties left unoccupied for more than a year are required to pay a **Council Tax Levy** of 100%, although there are some categories of exception from the levy. The Levy provides a financial incentive for owners to bring their properties back into occupation, often through sale, rent or renovation. The Levy generates approximately £500k per annum which is set against the Council's prudential borrowing, which funds the Council's new build housing programme. This means that although existing property(s) may remain empty, the outcome can still be increased supply of housing.

We do not require private sector leasing, nor do we seek to purchase empty properties from the open market for provision of social housing.

Issues relating to empty properties in poor physical condition are discussed in detail under **Priority 4**.

¹¹ More information on Council Tax exemptions and reductions is available here: http://www.moray.gov.uk/moray_standard/page_94161.html and in Scottish Government Guidance available here: <https://beta.gov.scot/publications/council-tax-on-second-and-long-term-unoccupied-homes-guidance/>

¹² where account holders receive discounts whilst the property is being marketed for sale or rent, or has been recently sold, or is being repaired or renovated, or empty for up to 6 months

Priority 2: To prevent and alleviate homelessness

Approach

Throughout the term of this LHS, Moray Council will use a housing options approach to minimise the number of people experiencing homelessness. For those who do become homeless, the Council will use a rapid rehousing approach, providing good quality temporary accommodation where necessary.

Context

The alleviation of homelessness is a major Scottish Government housing priority and while significant progress has been made in reducing the numbers of homeless people in Scotland, there is no room for complacency.

The Scottish Government has developed a legislative framework for governing homelessness and it is considered to be the most progressive of its kind. A summary of the key legislation which underpins the homelessness legislative framework is below:

Housing (Scotland) Act 1987 is the primary legislation which governs how Scottish local authorities should respond to homelessness and lays out the statutory responsibilities for assessment and provision of both temporary and permanent accommodation provision. In February 2010, section 32a of this Act was amended to give the local authority the ability to discharge duty to homeless people into private sector housing.

Housing (Scotland) Act 2001 incorporated specific duties which made amendments to the *Housing (Scotland) Act 1987*.

Homelessness etc (Scotland) Act 2003 introduced a requirement that Councils remove the priority need test from its homelessness assessment process by December 2012.

Code of Guidance on Homelessness, Scottish Government, 2005

Equality Act 2010 and the associated public sector duty which requires public sector bodies to “remove or minimise disadvantage suffered by persons who share a relevant protected characteristic”.¹³

Scottish Social Housing Charter, Scottish Government 2012 provides a framework for greater Homelessness service user involvement.

The Scottish Housing Regulator aims to protect the interests of tenants, homeless people and others who use social landlords’ services

The Homeless Persons (Provision of Non-permanent Accommodation) (Scotland) Regulations 2010 relates to Housing Support and replaced previous “Interim” accommodation legislation – i.e. when a person is unable to sustain a permanent tenancy because of high support needs then they can be accommodated under these rules. (currently under review)

Housing Support Services (Homelessness) (Scotland) Regulations 2012

Amendment to *Housing (Scotland) Act 1987* (inserted by *Housing (Scotland) Act 2010*), 2013

¹³ <http://www.legislation.gov.uk/ukpga/2010/15/section/149>

The Homeless Persons (Unsuitable Accommodation) (Scotland) Amendment Order 2017 came into force on 2 October 2017, and requires that no children or pregnant women should be housed in Bed & Breakfast-type accommodation for more than 7 days

Scotland's transition to rapid rehousing, HARSAG, June 2018

Guidance on Rapid Rehousing Transition Plans, GHN, September 2018 was commissioned by the Scottish Government and aims to assist local authorities to develop their Rapid Rehousing Transition Plan

Key issues and drivers

The HNDA 2017 provides analysis of homeless presentations over 2012 to 2017 and found that over the last 5 years:

- The group most likely to become homeless are aged between 18 to 49 (80%)
- The majority of applicants are single person households (53%)
- The main reason for homelessness is being “asked to leave”, followed by a “non-violent dispute within the household”.
- The vast majority of households presenting as homeless have a local connection to Moray. The local connection is mainly associated with residency and family association.
- Approximately 60% of presentations were found to be statutorily “homeless/potentially homeless unintentional”.
- Repeat homelessness is generally lower than the Scottish average.

These trends have remained relatively stable over the last 5 years. However, the HNDA 2017 found that 2017/18 trends showed longer stays in temporary accommodation. Economic factors, the impact of welfare reform, and the lack of permanent housing options are considered key drivers of this trend.

The characteristics of homeless households have remained consistent in recent years with a **high proportion of single person households** compared to families. The age range of applicants has also remained consistent with **over a half aged 26-59** and around one third aged 18-25.

Universal Credit was rolled out in Moray in July 2018, affecting the affordability of housing for many households, particularly those aged under 35 as their housing costs are limited to the LHA shared room rate (currently max rent £59.04 per week)¹⁴. It is anticipated that the proportion of under 35s experiencing homelessness will increase during the term of this LHS, due to the lack of other affordable housing options.

The HNDA 2017 found that **1,179 affordable homes would be needed over 2018-2023, i.e 236 per year**, and that there is a significant shortfall in availability of affordable housing. The high proportion of single person homeless households has

¹⁴ Information on Moray's Local Housing Allowance rates are available here: http://www.moray.gov.uk/moray_standard/page_55298.html

resulted in significant pressure on **1 bed social rented housing**, both from temporary accommodation use and as a permanent housing option. This shortfall of supply has been discussed further in the Housing Supply Target (see Priority 1).

Outcomes

- We provide a high quality Housing Options service
- Time spent in temporary accommodation is minimised.
- There is an adequate and appropriate supply of good quality temporary accommodation
- There is adequate and appropriate provision of housing support

Strategy

Addressing homelessness in Moray is dependent on the success of other LHS Priorities, including addressing housing need and improving access to housing (Priority 1), improving housing conditions (Priority 4) and promoting social inclusion (Priority 5).

Actions under this LHS Priority centre on:

- Homelessness Prevention and Housing Options services
- Implementation of the Rapid Rehousing Transition Plan and a Housing First model for Moray
- Reconfiguration of temporary accommodation
- Provision of support services and improving tenancy sustainment.

The Council will continue to develop and review projects in order to prevent and alleviate homelessness and maximise the sustainment of accommodation. The Council will continue to research good practice and participate in the Scottish Housing Network's North and Island Housing Options Hub.

Action: Provision of a high quality Housing Options service

In October 2010, the Council introduced a Housing Options team with the aim of preventing homelessness where it was possible to do so. For those who do become homeless, the Council aims to offer good quality temporary accommodation where necessary, and assistance to find a suitable permanent home.

The Housing Options team can demonstrate success in that, consistently, approximately half of households using the service choose not to make a Homeless Application to the Council, and are assisted to find a housing solution short of

presenting as homeless. Our commitment to Housing Options will continue and is restated in our Rapid Rehousing Transition Plan.

The Council participates in the Highlands and Islands Housing Options HUB and uses this opportunity to benchmark and share best practice on issues relating to homelessness.

In addition to current Housing Options practice detailed above, for households threatened with eviction, Moray Council will investigate the potential use of Short Scottish Secure Tenancies (aka technical eviction) with appropriate housing support as an alternative to actual eviction and placement in temporary accommodation. This has potential to minimise costs and reduce the trauma of homelessness experienced by the household, especially any children involved.

More than half of homelessness presentations arise due to relationship difficulties with their household. Some of this homelessness could be prevented through intervention in the family. With this in mind, during 2019/20, the Housing Service will consider the need to enhance the specialist mediation services it is able to offer.

Action: Implement the Rapid Rehousing Transition Plan

The actions associated with our Rapid Rehousing Transition Plan (RRTP)¹⁵ have been mainstreamed throughout this LHS, across several Priorities. The main actions to be addressed in Priority 2 are to:

- Improve in the value for money of temporary accommodation
- Reduce the length of stay in temporary accommodation
- develop and implement a Housing First model for Moray

It is notable that delivery of the RRTP is heavily dependent on achievement of actions relating to increasing supply of social housing, discussed further under Priority 1 and delivery of high quality support services discussed below.

The RRTP will be reviewed each year and updated as appropriate for each year of its 5 year transition period.

Action: Ensure provision of high quality Housing Support

Although all those assessed as unintentionally homeless in Scotland are entitled to settled accommodation, access to accommodation alone is not always sufficient to meet the need for some who are homeless or threatened with homelessness. The provision of housing support can be an important part of preventing homelessness and repeat homelessness.

¹⁵ Moray's Rapid Rehousing Transition Plan is available at http://www.moray.gov.uk/moray_standard/page_95565.html

Housing support services are an important factor in addressing homelessness and help people to live as independently as possible in the community. They can be provided in the individual's own home or in temporary homeless accommodation. Reasons for providing support include addictions, problems relating finance, literacy issues and dealing with correspondence. Housing support helps people to sustain and to manage their own tenancy and can include providing assistance to claim welfare benefits, to fill in other forms, assisting with the management of household budgets and helping to keep properties safe and secure. All housing support services are required by law to be registered with the Care Inspectorate¹⁶.

There is a corporate duty on local authorities to conduct a housing support assessment for applicants who are unintentionally homeless or threatened with homelessness and that they have 'reason to believe' need the housing support services prescribed in the Housing Support Services (Homelessness) (Scotland) Regulations 2012 .

The Council established a housing support service in 2010. The Housing Support Team provide ongoing support for vulnerable households who may be at risk of homelessness. The team regularly receive tenancy sustainment referrals (including Section 11 referrals) from within Moray Council as well as local RSLs. These are often associated with mental health problems, drug and/or alcohol abuse, and the team regularly signpost/re-refer households to more specialist services as well as providing the support within their remit.

The Team report an increasing number of homeless households **with complex support needs** who are likely to spend more time in temporary accommodation before being assessed as able to sustain their own tenancy and receive an offer of permanent accommodation. This group are the focus of the Council's forthcoming **Housing First** model to be developed as part of the Rapid Rehousing Transition Plan.

¹⁶ <http://www.scswis.com/>

Priority 3: To assist people requiring specialist housing

Approach

Throughout the term of this LHS, Moray Council and will aim to reduce health inequalities and promote good health outcomes, and will contribute to the aims of Health and Social Care Moray and the NHS.

Context

The HNDAs 2011 and 2017 both found a shortage of housing with appropriate design features and adaptations to meet the needs of a range of households, including older people, people with disabilities and/or vulnerabilities, people who need supported or other specialist housing for households to meet their specific needs.

Under this Priority, the Council aims to increase the supply of specialist housing across all tenures to meet current and projected future needs. Close collaboration with Health and Social Care Moray and the NHS will be required over the term of this LHS and beyond, to achieve the outcomes under this Priority.

Work on this priority is diverse, and so has been structured around the following household groups, most of which have housing needs identified in the HNDA 2017:

- People with physical disabilities
- People with learning disabilities
- Gypsy Travellers

Joint Strategic Needs Assessment

The approaches taken on the delivery of specialist housing has particular regard for the findings of the recent Joint Strategic Needs Assessment (JSNA) approved by Health and Social Care Moray in November 2018.

The JSNA has identified 9 areas to focus activity on. Housing and housing related services can contribute to most of these areas e.g:

- Inequalities of health
- Ageing population
- Chronic disease and multi-morbidity
- Mental health problems
- Drug and alcohol misuse
- Support for informal carers

People with physical disabilities

Approach

In common with many other parts of Scotland, Moray's population is ageing. Older people are more likely to require housing which provides easy accessibility. Moray's housing stock, across all tenures, does not provide enough housing which is accessible or readily adaptable to meet the needs of older people now, nor in the future.

We will aim to reduce health inequalities, promote independent living and good health outcomes, and will contribute to the aims of Health and Social Care Moray and the NHS. We will use a variety of means to reduce housing need associated with physical disabilities, including provision of disabled adaptations, provision of specialist adapted housing and seeking to influence the design of housing through planning policies.

Context

Homes Fit for the 21st Century: The Scottish Government's Strategy and Action Plan for Housing in the Next Decade: 2011-2020 states "for 2020, our vision is for a housing system which provides an affordable home for all. To achieve this we will need ... a substantial increase in the number of homes of all types, including housing to meet the needs of disabled people and older people for independent living."

*Age, Home And Community: A Strategy For Housing For Scotland's Older People: 2012 – 2021*¹⁷ - suggests the form of housing, including new build housing, which is most appropriate for older people.

Reshaping Care for Older People: A Programme for Change 2011-2021 provides a framework to address the challenges of supporting and caring for Scotland's growing older population¹⁸

National Dementia Strategy, Scottish Government 2017-2020 builds on progress over the last decade in transforming services and improving outcomes for people affected by dementia.¹⁹

*Health and Social Care Moray Strategic Plan 2016 – 2019 (under review)*²⁰ aims to support people to live independently at home or in a homely setting for as long as possible, and acknowledges the vital contribution that housing can make to improving health and wellbeing outcomes.

¹⁷ Age, Home And Community: A Strategy For Housing For Scotland's Older People: 2012 – 2021 available at <http://www.scotland.gov.uk/Publications/2011/12/16091323/0>

¹⁸ Reshaping Care for Older People: A Programme for Change 2011-2021 available at: <http://www.jitscotland.org.uk/action-areas/reshaping-care-for-older-people/>

¹⁹ Scotland's National Dementia Strategy available at <https://www.gov.scot/publications/scotlands-national-dementia-strategy-2017-2020/>

²⁰ Health and Social Care Moray Strategic Plan 2016-2019 available at <http://hscmoray.co.uk/strategic-plan.html>

Key issues and drivers

The definition of “older” is subjective, but for the purposes of this LHS, “**older**” people are defined as aged at least 65 years.

The HNDA 2017 found that, between 2018 and 2033 there are projected to be :

- 13% more households aged 60-74
- 43% more households aged 75+
- 135% more single adult households aged 90+

The HNDAs 2011 and 2017 both identified a shortage of housing suitable for older people and people with disabilities in all tenures.

The SHQS shows that the **level of adaptations** to social and owner occupied housing in Moray are around the same, but are **lower** than the national average for social housing and higher for owner occupation.

Increasing the supply of appropriately designed, adapted, or readily adaptable housing is essential to the success of other Strategies, particularly those associated with the delivery of health and social care services.

There are fundamental differences in the obligations of different landlords to fund disabled adaptations. Councils have a statutory obligation under the Housing (Scotland) Act 2006 to make budgetary provision for disabled adaptations for their own tenants from the Housing Revenue Account. Councils also have a statutory obligation to fund and administer grant assistance to owner occupiers and privately renting tenants from the General Fund. There is no such statutory obligation for RSLs to fund adaptations for their tenants.

Outcomes

- There is an adequate supply of appropriate housing for people with physical or sensory disabilities in all tenures
- There is an adequate supply of housing with support for older people

Strategy

The LHS will focus on increasing supply of, and influencing the design of, accessible housing in all tenures.

Action: Increase supply of ambulant disabled housing

It is widely acknowledged that the majority of older people would prefer to stay in their own homes for as long as possible. Both HNDAs 2011 and 2017 found significant numbers of older owner/occupiers seeking alternative accommodation, by registering on the Council’s Housing List. The drivers associated with such house moves are associated with increasing frailty or health need, the design and

adaptability of the current property, the repairs/maintenance/condition of the current property, fuel poverty and affordability issues, location/ isolation/ access to services/ the needs of formal and/or informal carers. **Older/disabled owner occupiers** living on a fixed income, often not in employment, **may struggle** to release sufficient equity from the sale of their home to **fund the purchase of a different home that does meet their needs**, e.g. with level access. These difficulties are compounded by the limited supply of adapted or readily adaptable properties on the open market.

It is unlikely that the public sector will be able to supply sufficient housing suitable for older people and people with disabilities.

Throughout the term of the previous LHS the Council and RSL partners have included ambulant disabled housing and wheelchair accessible housing in the vast majority of affordable housing developments. This LHS will continue this practice and this has been reflected in the Housing Supply Target (Priority 1).

Moray Council will not support the development of 1 bed wheelchair accessible or amenity properties for affordable rent. There is evidence to suggest that 2 bed units represent a more flexible and generic house type for this group. This strategic decision has implications for the Councils and RSLs allocations policies. The Moray Council's Allocations Policy already makes provision for all single person households assessed as requiring wheelchair accessible housing to be considered for 2 bed housing, to provide a greater likelihood of receiving an offer of rehousing. Housing Associations each set their own Allocations Policies under governance from their own Boards, and the Scottish Housing Regulator.

Action: Increase tenure choice for older people and people with disabilities

In 2013, Moray Council implemented its Local Development Plan policy on Accessible Housing. The Policy aims to increase supply of appropriately designed, accessible housing for open market sale. The Policy requires that 10% of all private sector units built are provided in single storey form (bungalow), have internal space and accessibility standards in excess of current Building Regulations, have accessibility standards which comply with the wheelchair access elements of Housing for Varying Needs. The Policy also aims to contribute to provision of sustainable and generationally diverse new neighbourhoods. We will continue to consistently apply this Policy throughout the term of this LHS.

The Scottish Government has recently made a scheme available for Shared Equity for Older People. This has been reflected in the Housing Supply Target detailed in Priority 1. We have included units of this type in our SHIP2018.

Action: Increase supply of extra care housing

Moray Council has been experiencing **reducing demand for sheltered housing** in recent years. Factors affecting this are; the location and/or the design of current sheltered stock, and the charging structure for the Sheltered Housing Warden Service. Also Community Care packages can be delivered to older people in their own home. In the future, it is likely that older households whose current home is unsuitable or cannot be adapted to meet their needs will require ambulant disabled housing or the more intensive support and care available in Extra Care housing.

Therefore, **the Council will not seek to increase the supply of sheltered housing** and this is reflected in the Housing Supply Target (Priority 1).

The HNDA 2017 found that approximately 179 more units of extra care housing will be required between 2018 and 2033, i.e. **delivery of 5 x 35 unit extra care developments, one completed every 3 years** during this period. If this cannot be achieved, consideration should be given to combining this need with the need for ambulant disabled housing to ensure sufficient supply of accessible housing which may be provided with care at home services in accordance with assessed need. This has been reflected in the Housing Supply Target detailed in Priority 1.

People with learning disabilities

Approach

This LHS has adopted the vision stated in the Moray Learning Disability Strategy 2013-2023 “Our Lives, Our Way” which is “people in Moray with a learning disability will have the same choices and opportunities as everyone else. Their independence will be supported by services which are developed with them and for them.”

Context

The context is provided through the following frameworks:

*The Keys to Life: Improving the quality of life for people with learning disabilities*²¹
*Moray Learning Disability Strategy 2013 - 2023*²² - which was written by people from the Moray Learning Disability Partnership Board
The Equality Act 2010 – reduces 9 major pieces of legislation, and around 100 statutory instruments into a single Act, making the law more accessible and easier to understand. It promotes fairness and equality of opportunity and tackles disadvantage and discrimination.
Moray Autism Strategy 2014-24. This strategy contains more details which specifically meet the needs of people who have an autistic spectrum disorder²³
Moray Learning Disability Commissioning Strategy 2013-23– includes “a range of housing opportunities” in its Outcomes²⁴
Health and Social Care Moray Strategic Plan is currently under review, but includes the transformational programme in Learning Disabilities Services as a key area of focus

Key issues and drivers

The Moray Learning Disability Strategy makes clear that “*a learning disability affects the way a person understands information and how they communicate. It is a medical diagnosis, not a label, and it does not tell us what a person is like or the skills and abilities they have*”. It also states that people with a learning disability face challenges, “*they may not have the same access to basic service such as health education, transport and housing as other people*” even though the law says they should.

²¹ The Keys to Life: Improving the quality of life for people with learning disabilities
<http://www.scotland.gov.uk/Resource/0042/00424389.pdf>

²² Our Lives, Our Way 2013 – 2023 is available at:
http://www.moray.gov.uk/moray_standard/page_90206.html

²³ Moray Autism Strategy 2014-2024 is available at
http://www.moray.gov.uk/moray_standard/page_83460.html

²⁴ Moray Learning Disability Commissioning Strategy is available at
<http://www.moray.gov.uk/downloads/file98650.pdf>

Learning disabilities and autistic spectrum disorders (ASD) **are not the same**. Some people with a learning disability also have an autistic spectrum disorder. Many people with an autistic spectrum disorder do not have a learning disability, and live independent lives.

This strategy will focus on the provision of housing and associated support services for people who are known to the Community Learning Disability Team of Health and Social Care Moray.

Outcome

There is an adequate supply of appropriate housing for people with learning disabilities

Strategy

During the term of this LHS, strategic housing activity including the supply of appropriate housing options for people with learning disabilities, will seek to support the aims of Health and Social Care Moray and the NHS.

The HNDA 2017 states that new specialist housing provision for people with learning disabilities will be guided by Health and Social Care Moray. Health and Social Care Moray have been working on a Learning Disability Transformation Project which aims to provide a foundation for the delivery of learning disability services that is sustainable for the future. The project is a systems wide approach for working towards better outcomes for service users and lower costs. The Project has included a comprehensive Accommodation Review, which is still ongoing, but moving towards a “progression model” of provision of housing and associated support has already been agreed. The Progression Model assumes that people with learning disabilities will not occupy the same housing throughout their lives, but in common with other people, will move from setting to setting as their life skills and support need change over time.

Moray Council Housing and Property have participated in the Accommodation Review over the last 2 years. Although still ongoing, it is clear that, to be successful, the progression model will require an increased range of housing options suitable for persons with a learning disability, provided with differing levels of care and this will require some new build provision. This range of options must include:

- core and cluster models
- extra-care housing
- housing provided with assistive technology

In principle, Moray Council will award a **high priority** in the SHIP for Scottish Government funding to developments which facilitate the aims of the Accommodation Review and the implementation of the progression model.

Gypsy/Travellers

Approach

Until Authorised Halting Sites are established in Moray, the Council will continue to implement its Protocol and Guidelines for the Response to Unauthorised Camping in Moray²⁵. The Protocol states that “Public Agencies in Moray recognise and respect the fact that Gypsies/Travellers may wish to maintain a travelling way of life whether because of family tradition, economic necessity, or simply a desire not to be “tied down. Camping is seen as an expression of the Gypsies/Travellers’ cultural identity. Agencies acknowledge that there should be no discrimination against Gypsies/Travellers because of their way of life and culture”.

Context

The context is provided through the following frameworks:

The Equality Act 2010

The Human Rights Act 1998

The Criminal Justice and Public Order Act 1994

Protocol and Guidelines for the Response to Unauthorised Camping in Moray, Moray Council, provides clear guidelines on the procedures to be followed by all agencies when responding to unauthorised camping of Gypsies/Travellers in Moray

Moray Housing Need and Demand Assessment 2017

Local Housing Strategy Equality Impact Assessment

Key issues and drivers

In 2017, in conjunction with Aberdeen City and Aberdeenshire Councils, Moray Council commissioned a Grampian Gypsy/Traveller Accommodation Needs Assessment. The research was carried out by the University of Aberdeen and GREC and completed in March 2018.

Moray Council does not provide any Council-run short stay sites, and there is limited private site provision. Instead Moray Council has focused on management of unauthorised encampments, and employs a part-time Gypsy/Traveller Liaison Officer based in the Housing service. This is reflected in the research.

Although the research does not provide a definitive number of sites required, the writers have estimated that **a site for 6 pitches** somewhere in Moray would be justified.

²⁵ Protocol and Guidelines for the Response to Unauthorised Camping in Moray available at: http://www.moray.gov.uk/moray_standard/page_51689.html

There has been a downward trend in the number of unauthorised encampments in recent years as shown in the table below:

Housing Market Area	Ownership	2013-14	2014-15	2015-16	2016-17	2017-18	Total
Buckie HMA	Private	17	9	5		6	37
	Public	1		1	3		5
	Total	18	9	6	3	6	42
Elgin HMA	Private	7	2	5			14
	Public	2	2	3	8	8	23
	Total	9	4	8	8	8	37
Forres HMA	Private	2	3	1	1	7	14
	Public	14	12	18	8	12	64
	Total	16	15	19	9	19	78
Keith HMA	Private	11	6	5			22
	Public	3	1	10	2	2	18
	Total	14	7	15	2	2	40
Moray	Private	37	20	16	1	13	87
	Public	20	15	32	21	22	110
	Total	57	35	48	22	35	197

Source: Moray Council records

Unauthorised encampments tend to occur in a small number of regularly used places. These are often on publicly owned land (Moray Council/HIE), and often on industrial land. The researchers have suggested that the identification of potential Gypsy/Traveller sites should be considered as part of LDP land designation decisions.

Outcome

Gypsies/ travellers have access to appropriate short and long term accommodation to meet their needs.

Strategy

The Local Development Plan 2020 Delivery Plan includes an action to identify a suitable site(s) for a gypsy/ traveller halting site to meet the requirements of Scottish Planning Policy (Action 13).

In the meantime, the Council and its partners will continue to implement the Protocol and Guidelines for the Response to Unauthorised Camping in Moray.

Priority 4: Improve the condition and energy efficiency of housing, and minimise fuel poverty

Fuel Poverty and Climate Change

Approach

We will ensure that as many households as possible in Moray live in a warm, comfortable home they can afford to heat. We will seek to reduce energy consumption in homes and promote the use of renewable energy sources for heating.

We will seek to achieve this by:

- improving the energy efficiency of the housing stock in order to remove poor energy efficiency as a driver of fuel poverty;
- making comprehensive energy advice available to individuals and communities at greatest risk of fuel poverty;
- ensuring that investment in home energy efficiency energy and energy advice and support is directed to households who are most vulnerable to fuel poverty;
- ensuring that new housing is built to high standards of energy efficiency
- participating in programmes to de-carbonise the heating supply

Context

The *Housing (Scotland) Act 2001* placed a statutory duty on the Scottish Government to eradicate fuel poverty, as far as is reasonably practicable, by 2016 and requires councils to develop local housing strategies which ensure, "so far as reasonably practicable", that persons do not live in fuel poverty".

The consultative Draft Fuel Poverty Strategy for Scotland 2018 establishes a new definition of fuel poverty and a new target for reducing fuel poverty. The draft strategy sets out the policy development of the Fuel Poverty (Target, Definition and Strategy) (Scotland) Bill.

The *Climate Change (Scotland) Act 2009* aims to reduce carbon emissions, with reduction targets of 42% by 2020 and 80% by 2050. The Act requires Scottish Ministers to set annual emissions and energy efficiency targets and places a duty on public bodies to reduce carbon emissions.

The Scottish Government has designated energy efficiency as a National Infrastructure Priority.

Energy Efficient Scotland Route Map 2018 sets out the journey Scotland's homes, businesses and public buildings will take to become more energy efficient and will be the primary mechanism for delivering programmes to tackle fuel poverty.

The cornerstone of the route map will be Scotland's Energy Efficiency Programme (SEEP) which aims to make Scotland's buildings near zero carbon where feasible by 2050 and which will develop innovative approaches to improving warmth in homes and other buildings with the support of substantial levels of investment.

The Scottish Government's proposals for the Regulation of Energy Efficiency in Private Sector Houses (REEP), announced in 2017, will introduce new standards for energy efficiency in private sector homes.

Key issues and drivers

The 2001 Housing (Scotland) Act target for eradicating fuel poverty by 2016 has not been met and has expired. At the time of writing, the Scottish Government was consulting on a new fuel poverty strategy which will give local authorities new duties and responsibilities in respect of fuel poverty eradication.

The Scottish Government's current definition is that a household is in fuel poverty if, in order to maintain a satisfactory heating regime, it spends more than 10% of its income on fuel and in extreme fuel poverty if it spends more than 20%. In its draft Fuel Poverty Strategy 2018, the Scottish Government intends to adopt a revised definition which moves the 10% fuel cost to income ratio to an after housing costs have been paid basis and introduces a new minimum income threshold for households experiencing fuel poverty.

The Scottish House Condition Survey (SHCS), which is used to by the Scottish Government to measure progress on fuel poverty, estimates that 45% of households in Moray (over 19,000 households) are in fuel poverty compared with the Scottish average of 31%²⁶. The SHCS estimates that 12% of households in Moray are in extreme fuel poverty compared with a Scottish average of 8%.

A range of factors place households in Moray at high risk of fuel poverty, including, low income – Moray has one of the lowest average incomes in Scotland – the poor energy efficiency of older housing stock (only 23% of dwellings in Moray have a high energy efficiency rating compared to the Scottish average of 37%), particularly in the private rented sector and the higher proportion of households living in off-gas remote and rural locations and paying higher fuel costs. 62% of fuel poor households are older households.

The SHCS estimates that 42% of owner occupied households in Moray (around 12,000 households) are fuel poor, compared with 54% in the social rented sector (around 5,000 households). Over 70% of households in Moray are in the private sector.

Homes in Moray have relatively poor energy efficiency. The average Energy Efficiency Rating (SAP 2012) for housing in Moray is 58.8 which is worse than the Scottish average of 62.9. In Moray, the ratings for social housing (62.1) were generally higher than both the owner-occupied (58.3) and private rented (55.6) sectors.

At 31 March 2018, 55.4% of the Council's stock (around 3,350 dwellings) met the Energy Efficiency Standard for Social Housing (EESH). 400 Council houses were exempt from the EESH, the vast majority being exempt for "technical" reasons.

Most RSL stock in Moray was built after 1980 to modern standards so it is anticipated that the majority of RSL properties will comply with the EESH.

²⁶ Scottish House Condition Survey 2014-2016 LA analyses Table 8.10

In Moray, there are no significant concentrations of deprivation and energy inefficient housing. Only one datazone (New Elgin East) falls within the 20% most deprived in Scotland but not for the key fuel poverty risk factors of low income or poor housing.²⁷ The spatial pattern of deprivation is not evident in Moray at a datazone level with households at risk of fuel poverty dispersed across the area in larger and smaller settlements as well as in remote rural areas.

The Scottish Government's Energy Efficient Scotland Route Map (2018) provides a framework for Scotland's transition to a low carbon economy and the delivery of its Climate Change Plan for 2018 to 2038. As a key part of this framework, Scotland's Energy Efficiency Programme (SEEP) will build on the existing energy efficiency programmes for the housing sector, the Energy Efficiency Standard for Social Housing (EESH) and Home Energy Area based Schemes (HEEPS:ABS). For climate change goals which relate to housing, SEEP will focus on the decarbonisation of heat supplies to homes and other buildings, which will include Local Heat and Energy Efficiency Strategies (LHEES). It is expected that the Route Map will also introduce new statutory energy efficiency standards for existing and new homes.

Key Achievements – previous LHSs

During the life of the last LHS, significant progress was made on actions to improve the energy efficiency improvements of the housing stock and to provide energy advice to fuel poor and vulnerable households. The improvements to stock were delivered mainly by the Moray HEEPS:ABS programme and by the SHQS and EESH programmes of social landlords. Measures delivered through the HEEPS:ABS programme were mainly insulation to solid wall “hard-to-treat” properties. The programme consistently used all of the Scottish Government's annual resource allocation of around £1m per annum and maximised the level of funding available under the Energy Company Obligation (ECO). The programme saw external wall insulation delivered to the vast majority of solid wall properties of non-traditional construction in Moray.

The Warmer Moray Group was established to provide a focus for locally-based agencies to deliver and co-ordinate energy advice services to fuel poor and vulnerable households across Moray. These services include advice on reducing energy use in the home through behaviour changes, help to find the cheapest energy tariffs, income maximisation referral, support to deal with fuel debt and advice on funding sources for home energy efficiency measures. A home visit service for vulnerable households was also provided, delivered by locally-based energy advisors working for REAP and local housing associations.

Around 500 new Council and housing association homes have been built to the Scottish Government's “greener” standard for high energy efficiency standards and using renewable energy for heating.

²⁷ Scottish Index of Multiple Deprivation available at http://simd.scot/2016/#/simd2016_20pc/BTTTTTT/14/-3.3275/57.6522/

The Council put in place flood alleviation schemes in communities across Moray to address flood risk. All new homes were designed to accommodate climate change with suitably designed and sustainable drainage to protect against flooding.

Outcomes

- **People live in homes that they can afford to heat**
- **People live in energy efficient homes**

Strategy

The Scottish Government's draft Fuel Poverty Strategy 2018 identifies four drivers of fuel poverty – income (energy and benefits), energy costs, poor energy efficiency, and how energy is used in the home. Public authorities can only influence energy efficiency. The Council's strategic actions on fuel poverty have therefore focussed mainly on helping fuel poor households to improve the energy efficiency of their homes and reduce fuel consumption and energy costs

The Council's strategic actions on fuel poverty will continue to focus on helping fuel poor households to reduce their energy consumption. This will be achieved by improving the energy efficiency of their homes and providing them with support and advice on ways to save on energy costs.

We will seek to ensure that fuel poverty measures are targeted at households at highest risk of fuel poverty. This will include households in low incomes, living in hard-to-heat properties and vulnerable to cold. Many of these households will be living in remote and rural areas.

By reducing energy in homes, our actions to address fuel poverty will also contribute to climate change carbon saving objectives. However, to meet these objectives, it is recognised that actions to improve the energy efficiency of dwellings will also need to be directed to non-fuel poor households.

Action: Improve the energy efficiency of housing stock

The Council will continue to participate in the HEEPS:ABS scheme and will seek to maximise the resources spent in Moray. It is anticipated that the focus of the programme will continue to be insulation to solid wall properties, particularly those of non-traditional construction.

The Council will seek to maximise the funding opportunities available under SEEP to deliver home energy efficiency programmes and related initiatives. This will require a holistic approach to improving the energy efficiency of buildings across both the domestic and non-domestic services.

The Council and other social landlords in Moray will delivery energy efficiency improvements to ensure their housing stock complies with EESSH and the emerging EESSH2.

The Council will seek to maximise ECO funding for improvements to the homes of households at high risk of fuel poverty and vulnerable to cold. This will be achieved through securing higher levels of ECO funding through participating in the UK Government's Flexible Eligibility Scheme.

The Council will work with partners will support the delivery of programmes and initiatives emerging from Scottish Government's Energy Efficient Scotland Route Map, including the regulation of energy efficiency standards in the private rented sector, the development of Local Heat and Energy Efficiency Strategies and the delivery of energy efficiency improvements to homes in the private sector.

Action: Help households use their energy efficiently

The Council will continue to work with partners in the Warmer Moray Group to ensure that fuel poor and vulnerable households in Moray have access to a full range of energy advice and income maximisation services, including a locally-based home visit service.

The Council will also consider ways it can help non-fuel poor households to reduce their energy usage.

Action: Ensure that new social housing in Moray is built to the highest standards of energy efficiency

The Council and affordable housing providers will aim to ensure that all new homes provided by the Moray Strategic Local Programme are built to the highest standards of energy efficiency, including the Scottish Government's "greener" standard.

Improving stock condition – Private Sector

Approach

The Council aims to ensure that housing in all tenures in Moray is kept in a good state of repair. However, the primary responsibility for the condition of homes in the private sector lies with the owners. The Private Sector Council's Scheme of Assistance (SoFA) will provide owners with advice and assistance to help them maintain their homes in good condition and deliver improvements where required.

Although the SoFA provides information and advice to owners, the Council will provide financial assistance only to vulnerable households for disabled adaptations and for essential repairs.

The Council will work in partnership with other agencies to develop and deliver private sector housing improvement schemes, initiatives and programmes.

The Council will consider the use of enforcement powers as a means of improving substandard property in the private sector.

Context

The Housing (Scotland) Act 1987, Section 86, as amended, which contains the statutory definition of the tolerable standard that a property should meet to facilitate human habitation²⁸.

The Antisocial Behaviour etc (Scotland) Act 2004 introduced a national Landlord Registration scheme to help local authorities monitor private landlords and ensure that they are fit and proper to let residential dwellings.

The Housing (Scotland) Act 2006 aims to improve the condition of private housing, providing local authorities with tools to help, and where necessary compel, private owners to take action to repair, improve and maintain their property. The Act requires local authorities to: develop a *Scheme of Assistance (SoFA)* setting out arrangements for helping owners and landlords to improve private housing conditions; have a strategy in place to deal with below tolerable standard (BTS) dwellings and a policy to designate *Housing Renewal Areas*

The Private Rented Housing (Scotland) Act 2011 aims to support responsible landlords and address problems caused by landlords acting unlawfully by strengthening regulation of the private rented sector

The Housing and Property Chamber, First Tier Tribunal for Scotland, was formed in 2016, and has the power to deal with repair issues, including enforcement of the "Repairing Standard" against landlords whose properties are below standard.

The Council Tax (Variation for Unoccupied Dwellings)(Scotland) Regulations 2013 i.e. Council Tax Levy: From April 2015, owners of domestic properties left unoccupied for more than a year are required to pay a Council Tax levy of 100%.

The Housing (Scotland) Act 2014 introduced a new regulatory framework and code of practice for private sector letting agents.

²⁸ The definition of the tolerable standard is available at http://www.moray.gov.uk/moray_standard/page_88327.html

Key Issues and drivers

Moray's housing stock profile is detailed in Section 4 above and in the HNDA 2017²⁹:

Although property condition in Moray is slightly better than the Scottish average and broadly comparable with those of neighbouring local authorities, issues of disrepair and poor quality affect a significant proportion of the housing stock, particularly in the private sector. The Scottish House Condition Survey (SHCS, 2014-16) estimates that 26% of Moray dwellings (around 11,000 properties) are in urgent disrepair but this is not statistically different to the Scottish average of 31%.

Flood risk affects a number of properties in areas across Moray. Five major flood alleviation schemes have been completed in Moray but there are other flood risk areas where a flood scheme has not been promoted.

In March 2018, there were 337 dwellings on the Council's register of Below the Tolerable Standard (BTS) stock in Moray. There was a greater concentration of BTS properties in the Keith and Speyside Housing Market Areas when compared with the total number of dwellings in each area.

The SHCS 2014-2016 has found that approximately 6% of all dwellings in Moray are BTS, approximately 2,000, and that this is greater than the national average. However it must be noted that this conclusion is based on a very small sample of surveys.

Consistently, 7-8% of Moray's empty properties (approx. 140 properties) are in receipt of Council Tax discounts associated with poor property condition.

Moray does not have large geographical concentrations of private sector housing in areas in need of physical renewal. For this reason, designation of Housing Renewal Areas in Moray have not been considered. However, the Council's Environmental Health service receives a number of complaints each year from householders about the poor condition of neighbouring properties.

There are particular issues of poor house condition in rural Moray. In rural areas, there are complex interactions between house condition and a range of drivers of improvement which include ownership, tenure, transport, demand for housing and the economic and social sustainability of rural communities. The Council has **limited intelligence** on the specific details of **house condition in rural areas** in Moray but is aware that there are particular issues of disrepair and lack of occupation.

The Scottish Government has introduced a raft of legislative and policy measures to regulate and improve management standards and housing quality in the private rented sector. Under the **Landlord Registration Scheme**, these measures provide local authorities with a range of tools to address poor quality private rented housing and take action against landlords who fail to comply with the required standard. These include enforcement of the Repairing Standard, de-registration of landlords

²⁹ Source: HNDA 2017 Table 5.1

who fail to comply with standards or who are “unfit and proper” and referral of repair issues to the Housing and Property Chamber – First Tier Tribunal.

Outcome

- **People live in houses of good quality**

Strategy

Action: Implement the Scheme of Assistance (SoFA)

The SoFA will continue to encourage owners to take responsibility for the repair and improvement of their homes. This will help prevent private sector properties falling into disrepair and below the Tolerable Standard. Given the ongoing budgetary pressures, it is highly unlikely that the Council will be in a position to offer owners grants for home improvements and repairs and they will be expected to meet their repair responsibilities from their own resources. However, it is recognised that some owners may not be able to afford the cost of essential repairs. The SoFA will seek to offer help to these homeowners by providing advice on affordable forms of finance such as low cost loans, equity release and obtaining competitive prices for works.

The Council has a statutory duty to provide financial assistance for disabled adaptations. The responsibility and budget for adaptations and Care and Repair services transferred to Health and Social Care Moray on 1 April 2016. The development of adaptation services are overseen by an Adaptations Governance Group, which includes representatives of Health and Social Care Moray as well as the Housing service, which continues to be involved in the delivery of the service. The Council’s Housing Home Improvement Services Team continues to deliver the Care and Repair service and process grant applications. The Council will continue to work in partnership with Health and Social Care Moray to ensure that adaptation service performs to the highest standards.

The strategic approach to delivering adaptations services is set out in Health and Social Care Moray’s Strategic Plan and the Housing Contribution Statement incorporated in the plan.

As part of the Care and Repair service, the Council will continue to ensure that vulnerable people can access the support they need to maintain their homes in a good state of repair. The Council offers discretionary grant to elderly and vulnerable owners for essential repairs and improvements but this element of the budget has reduced over a number of years and its availability cannot be guaranteed during the life of the LHS. The Council is aware that some older owners in Moray may be unable to afford the cost of repairs without grant assistance. The Council will seek to support these owners by exploring all funding options available to them.

Action: Provide support, advice and assistance to owners of long term empty homes

The SofA sets out how the Council will provide advice and information to assist private home owners to maintain and repair their property and is based on the principle that the primary responsibility for maintaining private sector properties lies with the owner, and that this responsibility should be met with less reliance on grant subsidy to assist with the cost of house repairs and improvements.

Through the SofA, the Council will provide accurate advice to owners of empty properties. The Council will raise awareness of the assistance and services available to owners through the Council's website, local press etc.

Action: Contribute to the corporate approach to the use of available enforcement powers

The Council has pursued a dual strategic approach to empty homes combining provision of support and advice to empty home owners, including financial assistance via the loan fund, accompanied by the financial dis-incentive of the additional Council Tax Levy. The strategy has focussed on properties that are in reasonably good condition and in areas of high demand rather than properties that are derelict and in need of comprehensive and costly improvement and repair. The potential for these properties to contribute to increasing the supply of housing is discussed further under Priority 1.

The Council implemented an Empty Homes Strategy, and has employed an Empty Homes Officer since 2015. The outcomes achieved by the Empty Homes Officer have been modest, with 24 properties brought back into occupation. Moray Council's Empty Homes Loan Fund is available, which offers loans of up to £15,000 per dwelling to developers of affordable housing for sale or affordable rent, but not to owner occupiers. To date, no applications to the Fund have been received. Analysis of Council Tax Register data over time has shown that there is significant "churn" in the individual properties which are empty, suggesting that the majority of empty properties return to occupation without the Council's intervention.

Derelict properties fall out-with the scope of the Council's current strategic approach. During the term of this LHS the Council will consider the use of enforcement action and **Compulsory Purchase Order (CPO)** powers to deal with them on an individual basis.

Due to budgetary constraints, the Council has used statutory house condition enforcement powers only on a selective basis. For a number of years, the Council has not had a budget allocation for budget for statutory enforcement action on house condition and it is anticipated that this restriction will continue during the life of the LHS. Despite these constraints, the Council remains committed to bringing as many empty homes as possible back into use but will review its approach throughout the term of this LHS.

Action: Maintain a Register of Private Landlords

Through its Landlord Registration Scheme, the Council will seek to improve housing quality in the private rented sector in Moray by enforcement of the “Repairing Standard”. We will seek to engage with private landlords to increase their awareness of their legislative responsibilities and requirements in terms of the management of tenancies and the quality and energy efficiency of their properties.

Where we receive reports of properties in a poor state of repair, we will work with private landlords to encourage them to bring their properties up to standard but will report cases to the Housing and Property Chamber – First Tier Tribunal where landlords refuse to comply with the Repairing Standard.

Improving stock condition – Social Sector

Approach

During the term of this LHS we will focus on our EESSH compliance plans and implementation of our Asset Management Strategy.

Context

The Housing (Scotland) Act 2010 aims to ensure that that good quality services are provided by social landlords in Scotland. The Act introduces a Scottish Social Housing Charter which sets out the outcomes and standards, including the quality of homes and related maintenance and repair services that tenants of social housing can expect their landlords to provide.

The Scottish Government requires that the housing stock of social housing landlords complies with the *Energy Efficiency Standard for Social Housing* (EESH) by December 2020.

Key Issues and drivers

Launched in 2014, the EESH is intended to address fuel poverty in the social housing sector and contribute towards the achievement of the carbon emission reduction targets set by the Climate Change (Scotland) Act 2009. The Scottish Housing Regulator monitors social landlords' progress towards EESH compliance.

Outcome

- **People live in houses of good quality**

Strategy

Action: Ensure that all social rented housing stock in Moray meets the EESH by 2020

Asset Management Strategy sets out the financial framework and delivery mechanisms required to ensure that Council housing stock is maintained in good condition, and comply with statutory and regulatory requirements. As part of its Asset Management Strategy, the Council has put in place a programme of energy efficiency improvement to its housing stock to achieve EESH by 2020. Progress on EESH delivery is monitored as part of the LHS Performance Framework (see Section 11 and Appendix 3).

Other social housing landlords in Moray also have programmes in place. Beyond 2020, social landlords will be expected to achieve higher levels of energy efficiency for their housing as part of EESH2 requirements.

9. Tenant Participation

All social landlords in Moray have a statutory duty to produce a Tenant Participation Strategy and are also required by the Scottish Social Housing Charter to take account of the views and priorities of their tenants in shaping their services. Moray Council's Tenant Participation Strategy is available at http://www.moray.gov.uk/moray_standard/page_1920.html.

The Registered Tenant Organisation (RTO) operating in Moray is at the heart of the Council's Tenant Participation Strategy, allowing tenants to influence the Council housing policies and giving them a say in the way in the Council delivers housing services. RTO representatives also sit on the Council's Communities Committee, which is responsible for housing management matters. Although non-voting members, the inclusion of RTO representatives on the Committee provides an opportunity for tenants to participate in the key decisions regarding the development of the Council's landlord services. The Council provides funding, training and other support to RTO members as well as setting aside an environmental budget to be used for local improvements identified by the tenant forums.

The Buckpool New Build Tenant Group, includes Moray Council and Langstane Housing Association tenants as well as the relevant services and local Councillors. The group were formed in November 2017 and aim to address local estate-based issues.

Residents of Moray are generally satisfied with their neighbourhoods. The Council's 2018 Tenants Survey found that 80% of tenants were satisfied with their neighbourhood as a place to live

10. Strategic Environmental Assessment

Strategic Environmental Assessment (SEA) is a method of considering and broadly evaluating the likely impact of a public plan, programme or strategy on the environment.

The most significant environmental impact of this LHS will arise from new build affordable housing developments. However such housing developments will be subject to planning approval, in accordance with the policies set out in the Local Development Plan 2020, and will be subject to current Building Regulations. The Council believes that these environmental impacts will be considered as part of the Local Development Plan SEA.

The LHS outcomes relating to Climate Change and Fuel Poverty are considered to have a minimal environmental effect. Any programmes are likely to be small scale and localised. Any major works associated with the Council's or RSLs' Asset Management Strategies, or with any Scottish Government insulation scheme (e.g. Green Deal, HEEPS) will be subject to Building Regulations, and will be covered by the Local Development Plan SEA.

11. Performance Management Framework

The achievement of the outcomes associated with this LHS will be measured by the performance indicators detailed in Appendix 3. These will be reviewed and reported to Communities Committee annually.