



ENVIRONMENTAL SERVICES

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Mark Cross
Principal Planning Officer
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Dear Mark,

Moray Local Development Plan Main Issues Report 2012

Thank you for the opportunity to comment on the Local Development Plan Main Issues Report. The following paragraphs provide detailed comments from Housing and Property as strategic Housing Authority. We have discussed these comments with Community Care colleagues with the aim of incorporating the objectives of the Moray Joint Commissioning Plan for Older People's Services 2012–2022.

The Supplementary Planning Guidance: Affordable Housing

The HNDA found that 424 units of affordable housing would be required per year. We note that a 5 year, effective, housing development supply has been identified for 1,964 units in the Local Development Plan Main Issues Report. However, the current Supplementary Planning Guidance: Affordable Housing will deliver a maximum of 491 units (98 units per year). Sites for less than 10 units will not generate any affordable housing contributions at all, and this disadvantages the smaller communities in Moray, where development is generally smaller scale.

We acknowledge that housing investment funding is limited at the moment, but the current Affordable Housing policy limits the potential we have to acquire investment opportunities, especially in the more rural towns of Moray.

Therefore, we would welcome the opportunity to participate in development of a revised Supplementary Planning Guidance: Affordable Housing.

Master planning of larger housing developments

The Joint Commissioning Plan for Older People's Services states "providing access to a range of housing options for older people and tackling social isolation are two of our strategic outcomes for older people in Moray. Our commitment to shift the balance of care means supporting older people to remain at home independently for longer. Housing and housing related support have a key role to play in supporting this and reducing the use of institutional care." and intends that "Community Resource Hubs will provide access to preventative services to the wider ageing population within communal facilities in the community e.g. sheltered housing"

The priorities of the Local Housing Strategy and Joint Commissioning Plan are closely aligned. The Housing Authority would welcome the opportunity to routinely comment on draft master plans for housing developments with the aim of ensuring that housing suitable for older people is located to facilitate access to Community Resource Hubs. These services might be housing and/or health related e.g. meals services, day care, health care surgeries. Community Resource Hubs could be extra care/very sheltered housing complexes, existing or planned.

Lack of accessible housing in the private sector

The HNDA has identified a shortage of amenity housing suitable for older people and people with physical disabilities or mobility problems. The HNDA defines amenity housing as self contained housing that has "level external access, and may have some disabled adaptation e.g. a level access shower/telecare/community alarm, either as part of the design or fitted retrospectively"¹. The HNDA suggests that older owner occupiers who need, or want, to move to more suitable housing struggle to find, or to afford to buy, accessible housing on the open market. These households have reduced housing options, and may apply for amenity housing available from the Council and/or Housing Associations.

In an effort to meet the housing needs of applicants on the Housing List, the Council and Housing Associations have invested a high proportion of available public funding in accessible, amenity housing. The current Strategic Local Programme 2012-2015 has allocated 42% of available funding to the delivery of amenity housing for social rent. Despite this, in view of household projections and the increasing number of older households, and with current constraints on public funding expected to continue in the medium term, we believe the social housing sector will not have sufficient supply to meet demand. An increase in supply of accessible housing in the private sector would ease the pressure on amenity housing in the social housing sector, and would also provide increased choice of housing tenure to the people of Moray.

The Council is aware that there are large areas within the towns of Moray where there is very little accessible/amenity housing in any tenure. The Council is also aware that older people in housing need are often, understandably, very reluctant to move out of

¹ HNDA 2011 para 8.9.5, Page 105

their community, especially where social and support networks of family/neighbours/friends would be lost or reduced. Such networks are very valuable in reducing social isolation and contribute independent living, thus meeting the aims of the Joint Commissioning Plan for Older People's Services. In future, we would like larger private sector housing developments to include a mix of house types that reflects the household composition of Moray, so that, in future, there will be move-on opportunities within these newly formed communities/areas, and reduced need to move out of a community as householders age.

We are aware that Glasgow City Council, and possibly other local authorities, have implemented planning policy² which requires housing developments to include a proportion of wheelchair accessible housing. We would like to request further discussion on the potential for a similar policy for Moray be considered, or to discuss other options which would achieve increased supply of modestly priced (lower quartile to median priced) accessible, amenity style, housing in the private sector. This would provide downsizing opportunities, and increased tenure choice, within communities, without the need for public subsidy.

Urban design in Moray

Could consideration be given to the development of planning policy which provides greater consideration to the lifestyles and requirements of the likely occupants of private housing? For example, amenity housing in any tenure is more likely to be occupied by older people or people with disabilities and therefore is best sited close to bus stops, shops, and other amenities and services. Also these households may have trouble maintaining a garden, and so private outside space should be available, but small and easily maintained.

What is the current status of the Sustainable Design Guide and will it become a material consideration in determining planning applications?

Designing Streets for Moray – home zones and parking requirements

The lack of a planning policy providing a local interpretation of the Scottish Government's Designing Streets policy, which is appropriate for the Moray context, has led to complications in the delivery of the Council New Build programme. The issues relate to the high proportion of amenity housing included in the Council New Build programme and our need to provide a safe, accessible streetscape for our tenants. The Council in its role as a landlord has to manage, and if possible pre-empt, the workload associated with potential neighbour disputes which might arise from a lack of parking spaces or on-street parking by residents, visitors or carers.

We have provided detailed comments on draft Roads and Transportation Guidelines in November 2012. We would welcome the opportunity to participate further in the development of a Moray Designing Streets policy.

² <http://www.glasgow.gov.uk/index.aspx?articleid=6759>

Pre-application process

The LHS 2013-2018 and the Joint Commissioning Strategy for Older People's Services aim to increase the supply of extra care housing. Our Housing Association partners advise us that the optimum size of an extra care housing development is approximately 30 units, similar to Chandlers Court, Elgin. All parties are keen to avoid any delays to the delivery of these developments, and are keen to avoid any abortive costs on publicly funded projects. Could consideration be given to lowering the threshold which triggers a pre-application meeting for such developments?

Fuel poverty and Carbon Emissions

The prevalence of fuel poverty is higher than the Scottish average. Fuel poverty in Moray is rising, whereas the Scottish average is falling. Fuel poverty is particularly prevalent in private sector housing. Could consideration be given to development of planning policies which would assist the LHS to achieve its Outcomes relating to fuel poverty e.g. Planning policy to permit external cladding to stone built properties, where the owner wishes, possibly through forthcoming Supplementary Planning Guidance on Sustainable Construction, to contribute to addressing fuel poverty and reducing carbon emissions in hard to treat/stone built properties.

I hope that these comments are useful in the development of the Proposed Plan.

Yours sincerely



Jill Stewart
Head of Housing and Property