



**Email to: [housingsupport@scotland.gsi.gov.uk](mailto:housingsupport@scotland.gsi.gov.uk)**

4 October 2011

Dear Sir or Madam

**DRAFT NATIONAL STRATEGY FOR HOUSING FOR OLDER PEOPLE:  
CONSULTATION**

I attach for your attention the response of RTPI Scotland.

From consideration of the draft Strategy there are four points of additional emphasis that I would like to make on behalf of the Institute. These are

- the importance of linking housing strategy with the land use planning system in general and Development Planning in particular
- the value of town and country planning as a preventative, early years-type intervention which can and will save time, money and resources in the medium and longer terms
- the need to set the Strategy in a context of creating high quality places which will satisfy the needs and requirements of older people as well as the wider community – design and placemaking issues are important elements of the Strategy and should be further highlighted; and
- the significance of seeing the delivery of housing for older people within a context and timeframe where Scotland's houses will require investment in adaptation and mitigation measures to address the challenges of global climate change.

The Institute would be happy to respond further if clarification of its response or any additional points is thought helpful.

Yours faithfully

**Charles Strang**  
Scottish Planning Policy Officer

## **DRAFT NATIONAL STRATEGY FOR HOUSING FOR OLDER PEOPLE: CONSULTATION**

### ***Response by RTPI Scotland***

Comments relate to page numbers of the consultation document

#### **Page 3**

##### ***Introduction***

The 'Key Facts' contained within the text box should be supplemented by indicating the population changes visually. They should also include information on the numbers of houses in Scotland, the number equipped for older people, the number of houses being converted each year for older people, the number of new houses being built, and the number of new houses equipped for older people.

There will be other 'changes' which should be included within the text box, including the effects of climate change adaptation and mitigation, energy costs, and transport patterns, especially public transport modes.

Not all of the older population will require additional support: again, the percentage currently requiring additional support could perhaps be extrapolated, but it would seem sensible also to factor in the relatively improving (if indeed it is) health of older folk.

##### ***para 4***

It is not clear as to exactly what constitutes current housing provision, whether it is in the right place, or what where and how we want it to be in 2021. Much of the focus required to answer these questions can be provided by analysis within the statutory development planning framework, especially the Local Development Plan, of the Local Planning Authority, and the Institute believes that it would be appropriate to flag this up on the first page of the Strategy.

##### ***para 5***

***first bullet point:*** Size, tenure and type are all important factors.

***second bullet point:*** Not all occupiers of specialist housing will require such care and support.

***third bullet point:*** As far as possible, domestic adaptation should still be accompanied by the maintenance of a sense of individual houses being part of communities/ neighbourhoods.

#### **Page 4**

first bullet point: There should also be information and advice on choices on adaptation to and mitigation of climate change.

##### ***para 3***

'Sustainable' is not a helpful word here. If what is meant is 'within available budgets' then that is what should be said.

***para 4***

Reference to Local Development Plans would be helpful.

***para 8 (at foot of page)***

There should be some funding available also to address climate change adaptation and mitigation: the possibilities of synergy should be highlighted here.

**Page 5**

***para 1***

Specific mention should be made of the potential of Community Councils, Community Trusts, Housing Associations, Charities (including religious ones), and volunteers.

***para 4***

It is a pity that the statistics are not yet available. Once they are, it will be necessary to assess how they are planned to change.

**Page 6**

**first bullet point**

This should also recognise the Strategic and Local Development Plans which are forthcoming in 2011 and later: perhaps there should also be recognition as to how the national strategy cascades down to planning authority and 'place' or neighbourhood levels.

**third bullet point**

Ease of support and funding will be critical, and adaptations should also incorporate the climate change agenda.

**fifth bullet point**

Environmental needs, and the need in particular to address climate change, should also be flagged up.

***para 6***

Presumably it will be necessary to relate the projected increase in numbers to the extent and location of adapted or suitable homes. Again, the Local Development Plans should be key in addressing such issues.

***para 8***

"re-ablement" should not be used: plain English is required.

**Page 7**

***para 1***

The 'Caring Together' strategy runs to 2015, and it will be refreshed toward the OPHS end date of 2021. There is clear reference to the 'world beyond caring' and that underlines the importance of location as a factor in the Strategy.

## **Page 8**

To the box text should be added 'in their own home, homely setting, and neighbourhood/community'.

### ***para 3***

'Involvement in planning' should be clarified. A specific mention should be made about adaptation to and mitigation of the effects of climate change.

### ***first bullet point***

Community/neighbourhood level should be mentioned: they should all reflect leadership values needed to address climate change.

### ***third bullet point***

Conversion/subdivision should also reflect the needs of planning for climate change, and location of housing within existing communities, and on brownfield sites where possible, should be specifically prioritised.

## **Page 9**

### ***para 1***

It should also be recognised that older people can often make major contributions to their community and neighbourhoods. Local Development Plans should be mentioned here. A key part of community understanding would be recording of local places, eg by digital photography.

### ***second bullet point***

Suitability in terms of adaptability/mitigation to climate change should also be assessed.

### ***third bullet point***

...and so minimise more costly and traumatic...

## **Page 10**

### ***para 1***

The scale of the problem and its local dimensions are not yet clear but will be different in different parts of the country, hence the need to promote the Strategy in the context of Local Development Plans. It would be particularly helpful if grants for Community Councils and for the improvement (including subdivision or conversion) of housing stock should become available. There will be a particular need to reduce carbon emissions and lower energy costs.

### ***para 3***

The programme of actions (Plan?) should be monitored annually with a review after every five years. This might best be done at the local level by reviewing as part of the Local Development Plan process.

### ***para 4***

Architects are another group who will be key in addressing the actions in the Strategy.

## **Page 11**

Clear strategic leadership

**Text Box**

There should also be reference to the need for environmental and economic dimensions to independent living: this should be provided through the town and country planning system, which will also focus on climate change and sustainable development.

**para 2**

*Local* may not equal *council-wide* in this case, and attention must be paid to the neighbourhood/place setting.

**para 3**

Planning and housing strategies must be key components of all Local Development Plans.

**Strategic Planning**

This is a term which is too unclear, and its definition in para 4 is inadequate.

**para 5**

The five-year period for Local Housing Strategies is too short. There should be a specific reference to the housing component of Local Development Plans, as well as to Community Plans and Single Outcome Agreements, and the coordination between them.

**Page 12**

**para 2**

To the three sectors should be added planning and design, (and environment, including community and neighbourhood settings).

**para 3**

Self-directed support is not a phrase in common use. There should also be an increased awareness among communities.

**para 4**

There should be flexibility as well as joint working.

**para 5**

There should be specific mention of the Planning System as one of the key collaborators.

**Page 13**

**para 1**

What *is* the percentage? We should be planning for all older people, and to be more equitable across the range. There may be little to learn about the planning and provision of housing, for older people, from those who are almost wholly market-driven.

**first bullet point**

To reach a vision it is first necessary to understand the scale of the problem, analyse it in detail, plan how to address it, implement the plan, monitor its actions annually, and

review after about five years. There should be consultation with older people and the wider community as part of each stage.

***third bullet point***

Strategic and Local Development Plans should all be key documents (and processes!) to understand the need for housing for older people, especially at the community and neighbourhood (*place*) level.

**Page 14**

***first bullet point***

Until the scale of the problem is identified it is not possible to say whether £70m will address it satisfactorily. There should be a parallel exercise which then allows integration of adaptation for older people with climate change adaptation and mitigation.

***text box***

No meaningful target is set here. Presumably it will only be positive progress if the figure increases as a percentage of the older population. It would also be helpful to set a target for the conversions/adaptations of housing for older and less able folk?

**Page 15**

***para 2***

Perhaps Shelter might carry out a consultative exercise. The RIAS and CIH are likely to have helpful thoughts on this matter.

***para 3***

It is important that this information percolates down to the community/neighbourhood level. Churches, housing associations and Community Councils, where appropriate, should have important roles to play here.

***para 4***

Face to face advice will need to be from people they can trust.

***para 5***

Ideally the housing health check should be available before times of transition/stress: thus the planning and housing authorities can anticipate needs of folk in specific neighbourhoods, and the resources available to meet them.

**Page 16**

**Para 2**

It is not clear how this can be ensured.

***second bullet point***

Churches and other charities, as well as housing associations and community councils could be added to the list.

***text box***

It is not clear what the current extent of the range is, nor the extent needed of its expansion.

## **Page 17**

There should be a reference to the Scottish House Condition Survey.

### ***para 1***

Exact figures are required for the numbers of existing houses and annual rates of new build and conversion. There should also be a reference stressing the locational dimension/variation to such statistics, and the need to consider the framework of Local Development Planning.

### ***para 2***

The size of the house will be a factor as well as its location.

### ***first bullet point***

Energy-saving/climate change adaptation should be added.

### ***second bullet point***

Reference to the Tolerable Standard, improvement grants or their absence, and energy/climate standards are all important here.

### ***third bullet point***

It may not always be appropriate to move. Adaptation may be a better option, especially if it can be planned well in advance.

### ***fourth bullet point***

This should be considered in the context of the Local Development Plan.

### ***text box***

Housing adaptations should also take into account climate change. Historic Scotland and Changeworks have carried out useful work in this field. The possibility of 'green grants' might be flagged up.

## **Page 18**

### ***para 1***

The link between health and temperature, including fuel poverty, should also be mentioned, along perhaps with design quality and mental health/general wellbeing.

### ***para 2***

This paragraph is unsatisfactory. What is required is a clear prediction of need for which to plan.

### ***para 3***

Adaptation for the older/less able should, along with climate change adaptations, be tenure blind. If householders cannot afford work then it is possible to place a charge on the title or arrange shared equity.

### ***para 5***

A similar grant arrangement should be set in place to address climate change adaptation/mitigation for all existing houses, and especially those of older folk.

## **Page 19**

### ***para 1***

The register of accessible housing should also incorporate ease of access to local facilities. House logbooks should be encouraged.

### ***first bullet point***

Partners in planning and climate change should be included.

### ***second bullet point***

If it is not already a feature, energy-saving initiatives should be included.

### ***first text box***

This aim is extremely vague and of no real practical value.

### ***second text box***

...warm, dry and secure, which are adapted to mitigate the effects of climate change, and which should have...

### ***last paragraph***

Private sector housing should be requested to meet the SHQS, as well as being assessed against it.

## **Page 20**

### ***para 1***

Figures should be provided, not just 'higher and falling more slowly... a very few...'

### ***para 2***

Climate change should be incorporated into this paragraph.

### ***first text box***

This is another vague and unhelpful proposal. In any event, against a rise in numbers of older people the aim should be for a rise in the percentage of older people...

## **Page 21**

There seems to be a measure of repetition in paras 1 – 2.

### ***para 3***

There will not be benefits in older people moving from family houses if there is no demand for family houses. What are the actual figures of need and change? Older people will also need to be near (or indeed move closer to) facilities which include public transport, shops, community facilities.

### ***para 5***

There should be mechanisms for dealing with such difficulties across all tenures.

### ***third bullet point***

Community Councils and Housing Associations may have roles here. There should also be enhanced support for addressing derelict or vacant buildings to convert them (BPTs?) into meeting social, economic and environmental needs through housing use.

## **Page 22**

### ***first text box***

This is far too vague.

### ***second text box***

This should also refer to climate change emission reduction.

### ***para 3***

In general it is preferable to have such housing integrated as far as possible into the community: tenure-blind rather than gated communities would appear to be a sensible preference.

## **Page 23**

### ***para 3***

What is that stock? Where is it? This information should appear in Strategic and Local Development Plans.

### ***first bullet point***

This is welcomed, but it will be important to consider the embodied energy in existing housing. Reference should be made to the importance of architectural design skills: the RIAS should be involved in consideration of this document.

### ***second bullet point***

'Public sector resources' should also mention design and the possibility of climate change funds.

### ***first text box***

This aim should address all sectors of sheltered housing in the context of local housing strategies and Local Development Plans.

### ***second text box***

This is a wish, and not nearly specific enough to be a useful part of a Strategy.

## **Page 24**

### ***para 1***

Owning property may not be the same thing as living in one's own house. Climate change adaptation and mitigation should be mentioned here also.

### ***para 3***

Rather than ways of improving the options, are they not rather ways of widening the range of options?

### ***text box***

Insufficiently specific. It should be clearer just how many older folk, how much it will cost, and where the cash might come from.

## **Page 25**

### ***text box***

All new housing... New housing should be accessible (including in terms of location) and adaptable.

### ***para 1***

What is that 'small percentage'? The Local Development Plan should be flagged up as the place where early engagement should take place.

### ***para 2***

All new housing should be 'zero carbon' and located where there are maximum sustainability benefits, generally towards town centres, on brownfield sites, with local facilities and public transport within easy walking distance.

### ***para 3***

There should be specific reference to the (Local and Strategic) Development Plans, as well as to the section of the Scottish Planning Policy which addresses Sustainable Development.

## **Page 26**

### ***para 1***

New housing should also be carefully orientated and designed with microclimate in mind. The possibility of house-sharing or co-ops might also be mentioned here.

## **Page 27**

### ***second bullet point***

This may be referring rather to layout or neighbourhood planning rather than Local Planning as it is understood.

### ***second text box***

Rather than merely increase the proportion, why not simply ensure that all new housing is capable of doing this job? Call it *long life, loose fit*, perhaps, but surely that can be an achievable ambition in the new Scotland: or at least, that each new house can be readily and inexpensively converted to cope with less-able folk of all ages.

## **Page 28**

### ***third bullet point***

Community Councils and Housing Associations will also be key players in this.

### ***first text box***

Specify number of older persons?

## **Page 29**

***para 4***

This might be better to appear at the start, explaining as it does what the Strategy is intended to do.

***first bullet point***

There should be engagement with Local Development Plans and with other planning mechanisms such as Village Design Statements.

***second bullet point***

Community Councils, Community Development Trusts and Housing Associations should be involved.

**Page 30**

***first text box***

If they aren't already then surely what is required is a map showing the 'black spots' so it is clear where energy must be applied.

***para 2***

Perhaps the 'handyman services' can be provided by some insurance scheme and the cost included in the rent.

***para 3***

Perhaps 'handitrusts' can be developed, with a charitable status?

***para 4***

The Institute supports the development of further Care and Repair models.

**Page 31**

***para 1***

Every house should have appropriate smoke alarms.

***para 2***

Allotments might also be mentioned here, and could also be something to be considered in the Local Development Plan context.

***text box***

Another vague if well-meaning text, the substance of which would be very difficult to measure objectively.

***last paragraph***

Community Councils have a vital role here which should not be restricted only to housing organisations.

**Page 32**

***para 1***

The Institute would support more, locally-based, Housing Associations. It is hoped that it will be possible to reach beyond mere numbers of houses, and consider outcomes rather more in terms of sense and quality of place.

***Telecare***

Data on energy use should also be 'harvested' as part of such packages.

***third text box***

'all older people' over 75 should at least have an estimated total for planning purposes.

**Page 33**

***Telecare***

Of course, such IT provision should be available in all houses in Scotland by 2021 or earlier, so that we can assess carbon emissions and be economically competitive as a nation.

**Royal Town Planning Institute Scotland  
October 2011**