

Local Housing Strategy

2013 – 2018

Short Document

1. Introduction

- 1.1. 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.
- 1.2. The complete LHS takes the form of this document plus a suite of related documents which cover the Council's strategic planning for housing. The related documents are:-
 - Homelessness Strategy
 - Strategic Housing Investment Plan
 - Strategic Local Programme
 - Scheme of Assistance
 - Temporary Accommodation Strategy
 - Asset Management Strategy
 - Tenant Participation Strategy
 - Moray Development Plan Strategic Environmental Assessment
 - Local Housing Strategy Equality Impact Assessment
 - Moray Housing Need and Demand Assessment 2011

2. Governance

- 2.1. The Housing Strategy Group provides a single forum through which housing providers; housing support services, planning agencies and housing developers can participate in the planning and development, and allocation of resources to address housing need in Moray. A full list of member organisations is available at Appendix 1.
- 2.2. All LHS activity is reported to, and approved by, the Council's Communities Services Committee¹.

3. Consultation

- 3.1. The LHS was subject to a period of formal public consultation during January – March 2013. The final version was approved for publication by the Council on 23 April 2013.

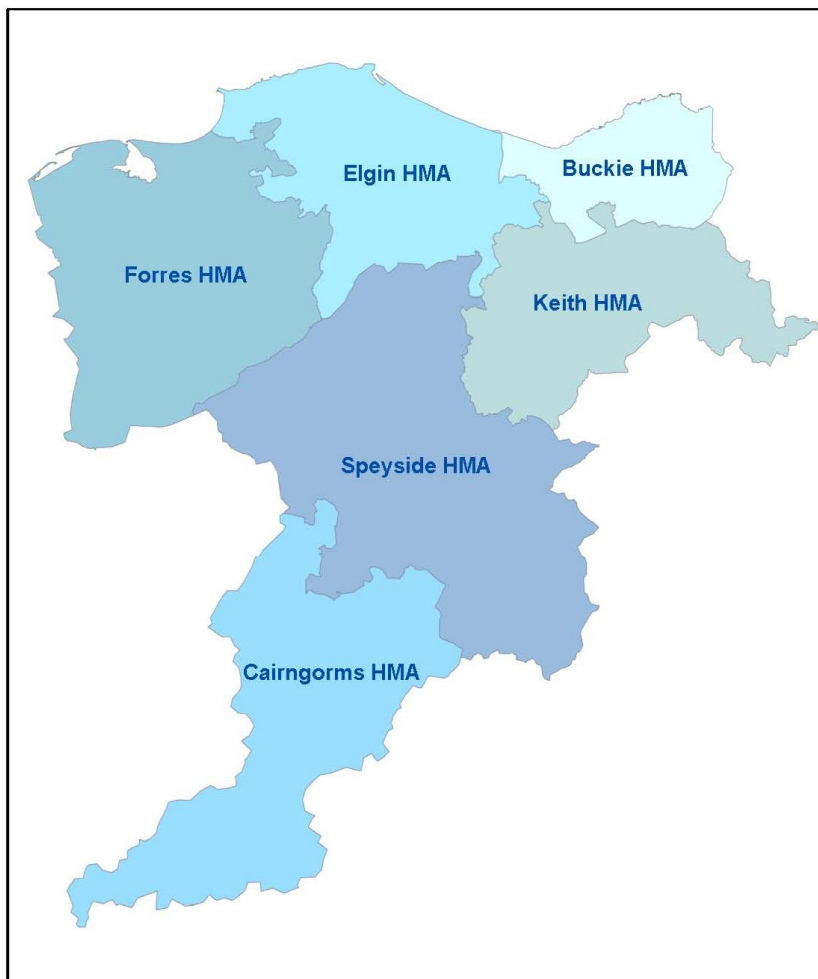
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¹ All Council Committee papers are available at http://www.moray.gov.uk/moray_standard/page_39823.html

4. Functional Housing Market Areas

- 4.1. A Housing Market Area is “an area that is meaningful to households searching for housing to suit their purposes”². Moray is a self contained housing market. 73% of houses sold in Moray, were bought by a purchaser originating from Moray. There are 6 sub-market areas; Buckie, Elgin, Forres, Keith, Speyside and the area of the Cairngorms National Park that lies within Moray Council’s boundary.
- 4.2. Housing Market Areas are housing search areas, identifiable to Moray’s general public. They do not necessarily match administrative/management boundaries.
- 4.3. 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 in Figure 1 below

Figure 1: Moray Housing Market Areas



- 4.4. A list of the towns and settlements included in each Housing Market Area is available at Appendix 3 of the full Local Housing Strategy 2013-2018.

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² Local Housing System Analysis: Good Practice Guide 2004, page 39

5. Equality

5.1. **The Equality Act 2010** requires Scottish public authorities to pay 'due regard' to the need to: eliminate unlawful discrimination, victimisation and harassment; advance equality of opportunity and foster good relations.

5.2. These requirements will apply across the 'protected characteristics' of:-

- age
- disability
- gender reassignment
- pregnancy and maternity
- race
- religion and belief
- sex and sexual orientation

5.3. Moray Council is committed to meeting its legal duties under equalities legislation.

6. Strategic Priorities and the Local Planning Framework

6.1. The overall aim of the Local Housing Strategy is:-

To ensure that sufficient good quality, affordable housing is available to meet the needs of people living in or requiring housing in Moray.

6.2. Moray's Single Outcome Agreement

6.2.1. "The Single Outcome Agreement is based on 5 local outcomes. These reflect strongly the Scottish Government's national outcomes. There are a number of these in the national outcomes which the Moray Community Planning Partnership recognises as overlapping themes which are integral to the delivery of all local outcomes. In order to create and sustain a better quality of life and opportunity for all Moray citizens the partnership has established the following outcomes:-

- Healthier citizens
- More ambitious and confident children and young people able to fulfil their potential
- Adults living healthier, sustainable, independent lives safeguarded from harm
- A growing and diverse economy
- Employability and employment skills"³.

6.2.2. This LHS aligns its priorities to those identified in the Council's Single Outcome Agreement. The LHS can contribute to most of the outcomes in

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³ The Council's Single Outcome Agreement is available at:
http://www.moray.gov.uk/moray_standard/page_2101.html

the 2012 Single Outcome Agreement 2012-2015 to some extent as set out in Table 1 below:

Table 1: LHS relationship to Single Outcome Agreement	
SOA Outcome	LHS Priority
Healthier citizens	Priority 1 Priority 3
More ambitious and confident children and young people able to fulfil their potential	Priority 1
Adults living healthier, sustainable, independent lives safeguarded from harm	Priority 1 Priority 3 Priority 4 Priority 5 Priority 6
A growing and diverse economy	Priority 1 Priority 2 Priority 4 Priority 5
Employability and employment skills	Priority 6

7. Moray Context

7.1. The LHS uses the Moray Housing Need and Demand Assessment 2011 (HNDA) as a key evidence base. The HNDA 2011 was appraised as “robust and credible” on 12 September 2011, by the Scottish Government’s Centre for Housing Market Analysis (CHMA)⁴.

7.2. Moray’s Demographic Profile

7.2.1. Moray’s population is growing slowly – 0.83% between 2001 and 2009. This population growth is not even across age groups. Moray’s population is ageing, and this is particularly evident in the Forres, Keith and Speyside HMAs.

7.2.2. The number of households in Moray is growing much faster than the population. This is consistent with the national trend towards increasing numbers of older, smaller households.

7.2.3. Between 2008 and 2023 there are projected to be:

- 9% more households
- 30% more single adult households
- 22% fewer families with children
- 15% more households aged 60-74
- 59% more households aged 75+

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<http://www.scotland.gov.uk/Topics/Built-Environment/Housing/supply-demand/chma>

- 166% more single adult households aged 90+

7.3. Moray's Economic Profile

7.3.1. The HNDA 2011 has found:-

- Moray has had low unemployment for many years.
- Moray has had low average incomes for many years. This is due to the large proportion of traditionally lower paid, lower skilled, service sector and manufacturing employment sectors.
- There are fewer professional/managerial jobs and no centres of higher education in Moray. This means that young people must move out of Moray to enter higher education. The limited employment opportunities mean that, once qualified, they tend not to return.
- Moray College, as part of UHI, could expand to provide services to more international students but is constrained by the lack of student accommodation of appropriate design and quality.
- RAF and Army presence contributes greatly to the local economy but makes Moray vulnerable to any MOD budget cuts and/or base closures.

7.4. Moray's Housing Stock

7.4.1. The HNDA found that:-

- 95% of dwellings are occupied. This level of occupancy has increased since 2001.
- Moray does not have any significant problems of low demand in the public or private sector.
- Numbers of second/holiday homes in owner occupation have reduced but remain most prevalent in CNP HMA (13%)
- Moray has a higher proportion of detached /semi-detached properties than the Scottish average, and fewer flats.
- Affordable rented housing stock has reduced due to the effects of right to buy legislation. Affordable rented stock levels have reduced most in Speyside HMA.
- Affordable rented housing is generally in better condition, better maintained and more fuel efficient than private sector housing

8. Housing Need and Demand in Moray

8.1. The HNDA 2011 found that:-

- 60% of Moray's households cannot afford to meet their housing need from the open market without assistance.
- 424 units of affordable housing will be required each year, for the next 10 years to meet housing need
- 114 units will be required each year, for the next 10 years, to meet demand for entry level priced market housing.

9. Local Housing Strategy Priorities

- 9.1. The Local Housing Strategy will concentrate activity on 6 agreed strategic priorities which Moray Council and its partners will seek to deliver during the next 5 years.
- 9.2. The Housing Strategy Group has consulted widely on the strategic priorities and outcomes to be addressed by the LHS. Some outcomes are based on the findings of the HNDA 2011; some are intended to fit with the priorities of the Single Outcome Agreement; some with statutory requirements and Scottish Government Policy; and some in reaction to consultation with stakeholders and the general public.

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

- Priority 1: To address housing need and improve access to housing
- Priority 2: To meet our statutory obligations to homeless households
- Priority 3: To assist people with particular housing needs
- Priority 4: To improve the energy efficiency of housing and address fuel poverty and climate change
- Priority 5: To improve the condition of Moray's housing stock
- Priority 6: To promote successful, safe, sustainable communities and social inclusion

9.4. Each LHS Priority details:-

- What our agreed outcomes⁵ 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.

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⁵ "An outcome is a result we want to happen", from The Scottish Social Housing Charter Discussion Paper, 2011, Page 5

**10. Priority 1:
To address housing need and improve access to housing**

10.1. Approach

10.1.1. The Council will work to reduce the number of households in housing need, through increasing the supply of affordable rented housing, using legislation to retain ownership of current affordable rented housing, and by making the best use of current stock and future investment in housing stock.

10.2. Key issues and drivers

10.2.1. Moray has a severe shortage of affordable housing. Welfare Reform is a major external influence on access to housing. The HNDA 2001 found that 60% of households in Moray cannot afford housing from the open market without help. Moray is a low wage economy and many households cannot afford to buy a house at current market prices. This problem has been exacerbated by the reduced availability of mortgage credit in recent years. The HNDA estimates that 424 more affordable homes are required each year to meet housing need in Moray.

10.2.2. Reduced public spending has reduced the capacity of the Council and RSLs to deliver new affordable houses. The Moray Affordable Housing Strategic Local Programme will only provide 150 new affordable houses during 2012 and 2015.

10.2.3. As well as funding, the supply of affordable housing will be subject to other constraints. The current Supplementary Planning Guidance (Affordable Housing) is unlikely to generate sufficient development opportunities to meet assessed need, and may disadvantage rural settlements. Also, the Council and local RSLs have a limited land bank for affordable housing development.

10.2.4. The HNDA 2011 found evidence to suggest that there is some under occupancy amongst Moray Council tenants, the majority of whom are over 65, the majority of whom are not on the Council's Transfer List. The HNDA also found that overcrowding is a significant driver of housing need and that **overcrowding and under occupancy** were both much more prevalent in the social rented sector, suggesting a lack of opportunity to move within the sector.

10.2.5. Moray's population is ageing and there is a mismatch between the demand and supply of different sizes and types of housing, both in the public sector and the private sector. It is unlikely that the public sector will be able to meet the increasing demand for smaller, accessible housing.

10.2.6. The Council has 4 separate Pressured Area Status designations but, despite this, approximately half of Moray Council tenants retain their Preserved RTB status.

10.3. Outcomes – what do we want to achieve

10.3.1. The agreed outcomes to be achieved through Priority 1 are:

- There is an adequate supply of affordable housing
- We make the best use of existing social rented housing
- Social rented housing is allocated equitably
- Every customer has their individual needs recognised, is treated fairly and with respect, and receives fair access to housing and housing services.

10.4. Strategy – what will we do to achieve these outcomes

10.4.1. **Action: increase the supply of affordable rented housing and maximising the value that can be achieved from any available Scottish Government funding.**

- Increase the supply of affordable rented housing
- Develop a strategic land bank for affordable housing
- Review of the Supplementary Planning Guidance: Affordable Housing
- Influence the size and design of houses provided in future affordable housing developments
- Influence the size and design of houses provided in future open market housing developments
- Research the market for, and feasibility of, intermediate tenures

10.5. **Action: make best use of current stock by reviewing Allocations Policies, and minimising the time taken to relet empty properties.**

- Regularly review allocations quotas
- Assess the impact of Moray Council's Downsizing Scheme
- Complete the Moray Council Allocations Policy Review
- Assess the impact of Welfare reform on demand for housing services

10.6. **Action: Maximise application of current legislative powers to retain affordable rented housing.**

- Consider the need for Pressured Area Status Designation renewal

**11. Priority 2:
To meet our legal duties to homeless households**

11.1. Approach

11.1.1. Throughout the term of this LHS, Moray Council will use a housing options approach to reduce the number of people experiencing homelessness. For those who do become homeless, the Council will offer good quality temporary accommodation, and assistance to find a sustainable home. During the term of this LHS, and following the term of the current Homelessness Strategy 2010-2015⁶, Moray will have completed a comprehensive review of its strategic response to homelessness issues.

11.2. Key issues and drivers

11.2.1. In times of economic recession, with known risks of increasing unemployment and intense pressure on household budgets, many households could be at a higher risk of homelessness. Welfare reform is likely to exacerbate this.

11.2.2. In October 2010, the Council implemented a housing options approach to homelessness applications, as part of its preparations for the removal of the priority need test in December 2012. The Housing Options team aims to provide enhanced information and advice on housing options to households at risk of homelessness. The Team has played a key role in reducing the number of people choosing to complete a homeless application. This has reduced the need for temporary accommodation, particularly B&B accommodation, but the lack of permanent affordable housing options remains an issue. Councils may use the private rented sector to discharge their duty to homeless households, but Moray's private rented sector is relatively small.

11.2.3. Most homeless households in Moray originate from Moray. Homeless households in Moray are predominantly single, increasing the demand for 1 bed properties. The number of households who are homeless because of domestic abuse has been rising.

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⁶ Moray Council Homelessness Strategy 2010-2014 available at http://www.moray.gov.uk/moray_standard/page_1917.html#HomelessnessStrategy2010-2015

11.3. Outcomes – what do we want to achieve

- People at risk of losing their homes get advice on preventing homelessness
- People looking for housing get information that helps them make informed choices and decisions about the range of housing options available to them
- There is an adequate and appropriate supply of good quality temporary accommodation for homeless households
- There is adequate and appropriate provision of housing support for homelessness households, including people fleeing domestic abuse

11.4. Strategy – what will we do to achieve these outcomes

11.4.1. Action: Ensure provision of good quality advice and assistance on housing options

- Ensure that the Council does not gate keep/screen households from Homelessness services
- Maximise use of the private rented sector to address homelessness
- Maintain the Moray Keyfund
- Reconfigure temporary accommodation to fit changing demands
- Ensure provision of good quality Housing Support
- Participate in the Multi Agency Risk Assessment Conferencing (MARAC)
- Ensure provision of good quality outreach services for households at risk from domestic abuse
- Continue to research homelessness issues and identify good practice
- Continue to develop Homelessness Service User Involvement

12. Priority 3: To assist people with particular housing needs

12.1. Introduction

12.1.1. The HNDA 2011 found a lack 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.

12.1.2. Under this Priority, the Council aims to increase the supply of particular needs housing across all tenures to meet current and future needs. Close liaison with Community Care service providers, the NHS, Occupational Therapy services etc, will be required over the term of this LHS and beyond, to achieve the outcomes under this Priority.

12.2. Older People

12.2.1. Approach

12.2.2. Over the term of this LHS, the Council and its partners will use all means at its disposal to increase the supply of housing which meets the housing and care/support needs of older people. The Council believes that provision of appropriately designed housing, in all tenures, can contribute to the Scottish Government's Strategy for Housing for Scotland's Older People 2012 – 2021.

12.2.3. Key issues and drivers

12.2.4. The population of Moray is ageing and housing and care providers will be required to develop solutions that will meet an increasing demand for older people's housing and related services. It is widely acknowledged that the majority of older people would prefer to stay in mainstream housing for as long as possible. Housing and community care policy, both at a local and national level, is committed to caring for older people in their own homes. However, this will require a sufficient supply of suitably adapted housing for older people, together with an appropriate level of care support for each household.

12.2.5. The HNDA identified a shortage of housing suitable for older people in all tenures. Affordability issues and a limited supply of suitably adapted housing on open market have resulted in many older people looking to affordable housing providers to meet their needs. However, ongoing funding constraints mean that it is unlikely that the public sector will be able to supply sufficient housing suitable for older people

12.2.6. Moray has proportionally less care home provision and less extra care housing for the frail elderly, than the Scottish average. Older people in Moray are more likely to be receiving home care services, and are much less likely to live in a house that has had a disabled adaptation, than the Scottish average.

12.2.7. The Council has noted falling demand for sheltered housing in recent years. In the future, it is likely that older households whose current home is unsuitable or cannot be adapted to meet their needs will require amenity/ medium dependency 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 stock.

12.2.8. Outcomes – what do we want to achieve

- There is an adequate supply of appropriate housing for older people
- There is an adequate supply of housing with support for older people

12.2.9. Strategy – what will we do to achieve these outcomes

- Seek to increase the supply of suitable housing for older people across tenures, through new build activity and adaptations to existing housing stock,
- Increase supply of extra care housing for older people requiring intensive support.
- Seek to influence the design of housing to facilitate the delivery of appropriately designed, readily adaptable, modestly priced market housing to meet the needs of Moray's older and/or disabled people, through local planning policy.
- Housing and community care services agencies, including NHS Grampian, will work closely together to plan and deliver housing and services that will meet the needs of the older people.

12.3. People with physical or sensory disabilities

12.3.1. Approach

12.3.2. The Council will use a variety of means to reduce housing need associated with physical or sensory disabilities. These will include provision of disabled adaptations, provision of specialist adapted housing and seeking to influence the design of housing through planning policies. This will be achieved through building on working relationships established between the Housing and Property Service, Development Services (Planning), Community Care Services, Occupational Therapy Services, and the Moray Community Health and Social Care Partnership (MCHSCP).

12.3.3. Key issues and drivers

12.3.4. Most of Moray's housing stock was built before 1965 when accessibility was not a recognised priority. Therefore, for many disabled people, improving access to their homes requires equipment and adaptations. In Moray, a household where at least one member has a long term illness (LTI) or disability is approximately half as likely to live in a house with a disabled adaptation than the Scottish average.

12.3.5. The HNDA 2011 found that, due to the increasing ageing population, current levels of funding for disabled adaptations are projected to result in a shortfall in provision, across all tenures/landlords. There are fundamental differences in the obligations of different landlords to fund disabled adaptations, i.e. Council's have a statutory obligation but RSLs do not.

12.3.6. Increasing the supply of appropriately designed, adapted, or readily adaptable housing is essential to the success of other Council Strategies, particularly those associated with the delivery of Community Care services, as well as other LHS Outcomes, particularly those under Priority 1 (Address Housing Need and Improve Access to housing), and Priority 3 Particular Needs (Older People). However, during the lifetime of the LHS, it is likely that the delivery of adaptations and the supply of new adapted housing will be constrained by reducing public funding. Efficiency improvements in the delivery of adaptations would help to ease these pressures as well as offering the potential to increase the speed of delivery.

12.3.7. Outcomes – what do we want to achieve

- There is an adequate supply of appropriate housing for people with physical or sensory disabilities

12.3.8. Strategy – what will we do to achieve these outcomes

- Increase the supply of accessible, adapted or readily adaptable housing across tenures
- Improve the delivery performance of disabled adaptations across all tenures/landlords
- Implement findings of Scottish Government review of disabled adaptations (not yet published)
- Research an appropriate target timescale for the delivery of disabled adaptations which is tenure/landlord neutral⁷.

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using the Change Fund B2 Local Improvement Measure as a baseline when data is available. JIT Reshaping Care for Older People Improvement measures available at <http://www.jitScotland.org.uk/action-areas/reshaping-care-for-older-people/improvement-measures/>

- Liaise with MCHSCP Change Fund Governance Group to identify efficiencies/improvements to the process of delivery of disabled adaptations.

12.4. People with Learning Disabilities

12.4.1. Approach

12.4.2. This LHS has adopted the vision stated in the Moray Learning Disability Strategy 2007-2010 which is “Adults with learning disabilities, their families/carers and staff from all services (Local Authority, NHS, voluntary and private organisations) will work in partnership with the aim of enabling the person with learning disabilities and their family to lead happy, healthy and fulfilling lives.”

12.4.3. Key issues and drivers

12.4.4. The Moray Learning Disability Strategy 2007-2010⁸ refers challenges arising from the growing number of people with learning disabilities (due to increased life expectancy and improved neo-natal care), and increasing expectations of service users and their families/carers.

12.4.5. The Moray Community Health and Social Care Partnership’s Joint Commissioning Strategy will include a needs assessment for people with learning disabilities but, at the time of writing, the findings were not available.

12.4.6. Outcomes – what do we want to achieve

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

12.4.7. Strategy – what will we do to achieve these outcomes

12.4.8. During the lifetime of the LHS, strategic housing activity, including the supply of appropriate housing options for people with learning disabilities, will seek to support the objectives of the Moray Community Health and Social Care Partnership’s Joint Commissioning Strategy.

12.4.9. The Council is committed to prioritising the identification of grant funding to increase supply of housing with integral 24hr support for people with learning disabilities, should this be required by the Moray Health and Social Care Partnership. Housing provision for people with learning disabilities who require more mainstream housing will be taken forward under Priority 1.

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⁸ The Moray Learning Disability Services Strategy 2007 – 2010 is available at http://www.moray.gov.uk/moray_standard/page_47311.html

12.5. People with Autistic Spectrum Disorders (ASD)

12.5.1. Approach

12.5.2. The Council is aware that some people with ASD may have very specific housing needs. Over the term of this LHS, the Council will continue to provide housing and disabled adaptations using an equitable, person centred, needs led approach. Over the term of this LHS, the Council will raise awareness of ASD amongst Housing staff.

12.5.3. Key issues and drivers

12.5.4. The Strategy for Adults in Moray with Autism 2011 – 2014 estimates there are 781 people in Moray with ASD, though not all will have a formal diagnosis. People with autism are among the most vulnerable and socially excluded in society yet many adults with autism receive either no services or inadequate services and struggle to cope with everyday life in society.”

12.5.5. The Strategy for Adults in Moray with Autism 2011 – 2014⁹ refers to the following strategic aims, which are relevant to housing services:

- Increase awareness and understanding of autism for staff
- Improving access for adults with autism to the services and support they need to live independently within the community.

12.5.6. Outcomes – what do we want to achieve

- There is an adequate supply of appropriate housing for people with autistic spectrum disorders
- We will make sure more housing service providers have a better understanding of autism issues
- “We will make it easier for adults with autism to choose how they live and get the help they want and need to do this”. The Strategy for Adults in Moray with Autism 2011 – 2014

12.5.7. Strategy – what will we do to achieve these outcomes

- Consider development of a Practical Guide for Social Landlords: Housing and Autism Spectrum Disorder (AS)¹⁰
- Consider delivery of awareness training to housing staff. Moray’s Autism Partnership Board is developing a training service which might be appropriate.

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1. ⁹ Available at http://www.moray.gov.uk/moray_standard/page_77362.html

2. ¹⁰ Example: <http://www.glasgow.gov.uk/NR/rdonlyres/8326FB52-88DD-469D-8D75-DDBC21E99A3A/0/PracticalGuideforRSLsHousingASDmarch10.pdf>

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- Consider revisions to Allocations Policies/ Medical Assessment Procedures to ensure an appropriate assessment of need is made, particularly relating to the number of bedrooms required, and the need for disabled adaptations.

12.6. Gypsies/ Travellers

12.6.1. Approach

12.6.2. 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 Moray¹¹. 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”.

12.6.3. Key issues and drivers:

12.6.4. The HNDA 2011 found a need for 23 pitches¹² for Gypsies/ Travellers in Moray, and suggested the pitches should be provided in small groups in a variety of locations across Moray. Moray Council currently has no authorised halting sites for Gypsies/Travellers. In 2009, unauthorised encampment activity was concentrated in 9-12 local authorities which included Moray¹³. The LHS EIA has identified the lack of authorised halting sites for gypsies/travellers as a potential negative impact under the protected characteristic of Race.

12.6.5. Outcomes – what do we want to achieve

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

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¹¹ Protocol and Guidelines for the Response to Unauthorised Camping in Moray available at: http://www.moray.gov.uk/moray_standard/page_51689.html

¹² The researchers “recommended that these figures are taken as guidance only and not as an exact calculation of need”

¹³ The Twice Yearly Count of Gypsies/ Travellers in Scotland No 15: January 2009 and No 16 July 2009, Scottish Government available at: <http://www.scotland.gov.uk/Topics/People/Equality/gypsiestravellers/Info>

12.6.6. Strategy – what will we do to achieve these outcomes

- The process of identification of potential halting sites will be taken forward as part of the development of the Local Development Plan 2013-2018. The Local Development Plan Main Issues report states that “to comply with Scottish Planning Policy, current Local Plan policies on residential caravans and travelling persons sites will have to be amended/revised to advise on where such sites can be located”.¹⁴
- In the meantime, the Council will continue to implement the Protocol and Guidelines for the Response to Unauthorised Camping in Moray.

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_____ Moray Local Development Plan Main Issues Report is available at http://www.moray.gov.uk/moray_standard/page_51210.html (Other Housing Issues)

13. Priority 4: To improve the energy efficiency of housing and address fuel poverty and climate change

13.1. Approach

13.1.1. We will seek to reduce fuel poverty and achieve carbon emissions from housing by improving the energy efficiency of housing in Moray. We will prioritise fuel poor households for energy efficiency measures and for energy advice services that will help them address fuel poverty.

13.2. Key issues and drivers

13.2.1. The Scottish Government considers a household to be in fuel poverty if, in order to maintain a satisfactory heating regime, it is required to spend more than 10% of its income on fuel. The Government's Scottish Government's Fuel Poverty Statement identifies three main causes of fuel poverty:

- Low disposable income
- High price of domestic fuel
- Poor energy efficiency of dwellings

13.2.2. The Scottish House Condition Survey (SHCS) estimates that fuel poverty in Moray is higher than the Scottish average with 33% of Moray households (over 13,000 households) in fuel poverty compared with a Scottish average of 28%. Householders in Moray are more likely to experience fuel poverty as a result of low incomes and the poor energy efficiency of homes. Dwellings with poor energy efficiency are more likely to be in the private housing sector than in the social housing sector. As a rural area, Moray has a high proportion of off-gas grid pre-1919, "hard-to-treat detached and semi-detached properties.

13.2.3. Energy advice agencies can offer households a range of services that will help them address fuel poverty. These include information on the cheapest fuel tariffs, advice on income maximisation through benefit take-up, support to access funding to install home energy efficiency measures and guidance on how to operate heating systems in the most efficient way. At present Moray does not have a locally-based energy advice service offering home visits to fuel poor households.

13.2.4. Housing is a significant contributor to carbon emissions and actions to improve the energy efficiency of housing will help achieve the carbon reduction targets required by the Climate Change Act 2009.

13.2.5. During the life of the LHS, the Green Deal and the related Energy Company Obligation (ECO) will be the key programme for funding and delivering energy efficiency measures to the homes of fuel poor households and achieving carbon savings from housing. In Scotland, Green Deal/ECO activity to address fuel poverty will be delivered within the framework provided by the National Retrofit Programme (NRP).

13.2.6. The Council relies on the Scottish House Condition Survey (SHCS) for its data on fuel poverty and the energy inefficiency of housing in Moray. However, the time-lag between the publication of SHCS data and the period surveyed means that the Council does not have access to current information with which to measure fuel poverty and monitor the impact of alleviation actions.

13.3. Outcomes – what do we want to achieve

- People live in housing that they can afford to heat
- People live in energy efficient housing that minimises greenhouse gas emissions

13.4. Strategy – what will we do to achieve these outcomes

13.4.1. It is recognised that the Council cannot directly control all the factors that cause fuel poverty. As the Council has limited influence on both the price of domestic fuel and household income, the Council's strategic actions on fuel poverty will focus mainly on reducing energy consumption of fuel poor households by improving the energy efficiency of homes and on providing advice on energy use, benefits and tariffs. By improving the energy efficiency of dwellings and minimising home energy use, actions to address fuel are closely linked to actions to address carbon emissions from housing.

13.5. Actions

13.5.1. Action: Deliver energy efficiency measures to the homes of fuel poor households in Moray.

In pursuing this action, the Council and its partners will seek to maximise the funding available to fuel poor households for energy efficiency measures under the NRP/Green Deal/ECO framework and other related programmes. The Council and its partners will explore opportunities to extend the gas grid network in rural areas and deliver community energy schemes. Solutions will also need to be developed to deal with hard to treat properties.

13.5.2. Action: Develop and implement a delivery model for the Green Deal in Moray.

The model should seek to achieve the strategic objectives of maximising up-take of funding, reducing carbon emissions, eradicating fuel poverty and promoting economic growth and employment.

13.5.3. Action: Promote high standards of energy efficiency and low carbon, sustainable design in the building of new homes in Moray.

13.5.4. Action: continue to improve the energy efficiency of social rented housing by:

- ensuring that all social rented housing stock in Moray complies with the SHQS by 2015

- implementing the requirements of the emerging Social Housing Energy Efficiency Standard.

13.5.5. Review current energy advice services and implement proposals to ensure that households in Moray can access a broad range services and support that will help them address fuel poverty and deliver energy efficiency measures to their homes.

13.5.6. Develop a local database for recording, measuring and monitoring fuel poverty levels in Moray and the impact of actions to improve housing with poor energy efficiency.

14. Priority 5: To improve the condition of Moray's housing stock

14.1. Approach

14.1.1. The Council will operate a Scheme of Assistance to enable households in the private sector to maintain their property in good condition. We will consider the use of enforcement powers as a means of improving substandard property in the private sector. We will ensure that all social rented housing stock in Moray meets the Scottish Housing Quality Standard by 2015 and beyond.

14.2. Key issues and drivers

14.2.1. Poor house condition is a significant problem in Moray, with 32% of private sector dwellings in urgent disrepair. Properties in poor condition are more likely to be found in the private sector with a higher level of disrepair in the private rented sector.

14.2.2. Properties in the social housing sector are required to comply with the Scottish Housing Quality Standard (SHQS) by 2015. As well as the SHQS, the Council also aspires to achieve a higher "Moray" standard for its stock. This standard will in the main provide higher levels of loft insulation, kitchen storage and enhanced electrical provision. At 31 December 2012, 89% of the Council's stock met the SHQS and 77% met the Moray Standard. The Council has 438 properties that are subject to exemptions from energy efficiency requirements of the SHQS due to being hard to treat or being off the gas grid. The Council will be required to develop a bespoke approach to improving the energy efficiency of these properties and is currently investigating a number of options, including the Green Deal and ECO funding.

14.2.3. The RSL stock in Moray is relatively new and mainly complies with the SHQS.

14.2.4. The Moray Private Sector Scheme of Assistance (SofA) is the principal means by which the Council helps owners to improve the condition of their property. The SofA 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 the grant subsidy to assist with the cost of repairs and improvements. From 2010/11 onwards, the Council has restricted the availability of grants to predominantly frail, elderly and vulnerable households whose need for adaptations and repairs take the highest priority and for whom the Council has a statutory requirement to provide financial assistance for disabled adaptations. The Council has a restricted budget for discretionary repair grants for older and vulnerable people. The budget for repair grants for this group is not sufficient to meet demand.

14.2.5. The Council has statutory powers to compel owners to improve substandard property. Enforcement powers could be used to secure the improvement of properties considered to be of strategic importance or which adversely affect the amenity of a neighbourhood. The Council has not used enforcement powers to date. There is currently no Council budget allocation to meet the costs of enforcement activity.

14.2.6. Under the SofA, elderly and vulnerable people are provided with the support of Care and Repair services to help them maintain their property. The prioritisation of this group for support under SofA contributes to national and local community care objectives to enable older people to remain at home for as long as possible.

14.2.7. In Moray there are a high number of empty properties in poor condition. The largest landlords in Moray are the rural estates mainly renting formerly tied cottages. With the decline in demand for tied accommodation, many of the properties are old, unoccupied and in a poor state of repair. The cost of repairing these properties can be prohibitive.

14.3. Outcomes – what do we want to achieve

- People live in houses of good quality

14.4. Strategy – what will we do to achieve these outcomes

14.4.1. Actions in the private housing sector:

- Provide a range of services under SofA, to support owners to invest in their property to ensure that it is maintained in a good state of repair
- Develop ways of targeting support under SofA to owners of properties that require urgent repair or are BTS or who cannot afford repair costs
- Prioritise older and vulnerable people for assistance under SofA and:
- Ensure that financial assistance under SofA is targeted to older and vulnerable households
- Continue to deliver Care & Repair services to support elderly and disabled owners to maintain and adapt their homes
- Maintain an adequate level of funding within the Private Sector Grants Budget to meet the cost of necessary repairs to the homes of older and vulnerable households.
- Develop options for improving the house condition of empty properties as part of a strategy for dealing with empty homes in Moray
- Implement the Private Landlord Registration Scheme Repairing Standard to help improve house condition in the private rented sector
- Review the use of enforcement action, including House Renewal Area designations, as a means of securing repairs and improvements to private sector properties in poor condition or which are a strategic priority for improvement

- Seek to support the improvement of rural homes as part of community sustainability strategy
- Develop local arrangements for recording and monitoring house condition in the private sector.

14.4.2. Actions in the social rented sector:

- All social housing providers in Moray to ensure that their housing stock meets the SHQS by 2015 and beyond
- The Council to ensure that its housing stock meets the Moray Standard by 2015 and beyond

**15. Priority 6:
To promote successful, safe, sustainable communities and social inclusion**

15.1. Approach

15.1.1. We will work in partnership with a range of agencies, stakeholders and community groups to ensure that communities throughout Moray are safe and successful. Residents will have a say in how their neighbourhoods are managed and services delivered by partners should be responsive to the needs of local communities.

15.2. Key issues and drivers

15.2.1. Moray is one of the least deprived areas in Scotland with no datazones in the 15% most deprived in Scotland as measured by the Scottish Index of Multiple Deprivation (SIMD). This datazone represents 0.9% of Moray's datazones and is deprived for non-housing factors, such as income, health and education. Only 1 of Moray's data zones (in Elgin) is in the 20% most deprived. 27.6% of Moray's data zones are within the 15% most access deprived in Scotland, due to the financial cost, time and inconvenience of travelling to basic services. As a rural area, the SIMD data does not fully capture the dispersed nature of deprivation in Moray, which is evident in small pockets and at an individual house level.

15.2.2. Residents in Moray are generally satisfied with their neighbourhoods. The Tenant Survey 2012 found that 87% of tenants were satisfied with their neighbourhood as a place to live. A Citizens Panel survey in 2009 on Safer Communities matters, including antisocial behaviour, found that rubbish/litter and dog fouling were the issues of most concern to residents in Moray and having the most negative impact on people's lives. The findings of the survey are supported by the results of the Council's 2012 Tenants Survey, which found that dog fouling and litter were the main neighbourhood problems raised by tenants. The tenants also identified parking issues as a concern to tenants.

15.2.3. The Council's planning service introduced the Urban Design Guide in 2011 in an effort to improve the quality of the design of new housing developments. The Guide, which supports the principles of the Scottish Government's "Designing Places" and "Designing Streets", aims to help housing developers design good quality, safe, sustainable neighbourhoods with streets that are less dominated by the needs of the car. To encourage community integration, the guide suggests that developments should aim to deliver mixed-tenure neighbourhoods and provide suitable accommodation for a broad range of households, including older people.

- 15.2.4.** The Moray Community Planning Partnership seeks to engage with local public and private agencies to plan and improve the delivery of services to local areas across Moray. To make services more responsive to the needs and aspirations of the various communities across Moray, a broad range of community interests are represented in the Partnership structure, including Registered Tenant Organisations (RTOs), area forums, community councils and the Citizen's Panel. The Safer and Stronger Group of the Partnership, which includes representatives of the Council and Grampian Police, is responsible for progressing local priorities in relation to community safety, antisocial behaviour, social inclusion and community engagement.
- 15.2.5.** The network of RTOs operating across Moray are at the heart of the Council Tenant Participation Strategy, allowing tenants to influence the Council housing policies and giving them a say in the way that 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.
- 15.2.6.** The Council provides funding, training and other support RTOs as well as setting aside an environmental budget to be used for local improvements identified by the tenant forums. However, the number of RTOs has declined from 6 in 2009 to 3 in 2012 with the remaining forums struggling for membership. However, despite this limited engagement, the 2012 Tenants survey found that 73% of tenants were satisfied or very satisfied that the Housing Service gives them the opportunity to make their views known.

15.3. Outcomes – what we want to achieve

- People live in attractive, socially balanced neighbourhoods, with good access to services.
- Communities play an active role in setting and delivering local priorities.

15.4. Strategy – what will we do to achieve our outcomes

- Social landlords to meet the standards and outcomes of the Scottish Social Housing Charter in relation to tenant participation and the maintenance and safety of neighbourhoods
- The Council to improve tenant and customer engagement with the work of the Housing Service
- Housing developers, including private and social, to deliver high quality, well-designed, sustainable mixed tenure estates in accordance with the requirements of the Urban Design guide, Designing Places and Designing Streets
- Social Landlords/developers/residents to develop effective arrangements for managing and maintaining mixed tenure estates
- Council to develop appropriate responses to community sustainment and social exclusion in rural areas in Moray
- Council and Community Safety partners, including Grampian Police, to continue to work together to deliver effective antisocial behaviour and community safety activities
- Council and partners to contribute to the implementation of the Moray Social Inclusion Strategy